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**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

**United States of America and State of  
California, *ex rel.* Rebecca Handal, et al.,**

**Plaintiffs,**

**vs.**

**Center For Employment Training,**

**Defendant.**

**Case No.: 2:13-cv-1697 KJM KJN**

**STIPULATION AND PROPOSED ORDER  
MODIFYING ORDER OF DISMISSAL**

The Parties hereby stipulate to the modification of the Court’s Order of Dismissal entered on October 7, 2019 as set forth below. This Stipulation is entered into by and among plaintiffs

Rebecca Handal, Dina Dominguez, and Elicia Fernandez (“Relators” or “Plaintiffs”), former plaintiff and Relator Christine Stearns, and defendant Center for Employment Training (“CET” or “Defendant”), by their respective authorized representatives (collectively, “Parties”).

On July 17, 2019, the parties stipulated to the dismissal with prejudice of Christine Stearns as Relator in the above-captioned matter as well as of all claims brought by Christine Stearns in her capacity as an individual Plaintiff. On September 5, 2019, the Court ordered the United States and the State of California to notify the Court of their position on the proposed dismissal of Christine Stearns. The United States and the State of California filed a Joint Response to this Order on September 10, 2019. In that Joint Response, the United States and the State of California advised the Court that they consent to the dismissal with prejudice of Stearns as a Relator and in her capacity as an individual Plaintiff. They did not consent to the dismissal with prejudice at that time of any claims brought by Stearns on behalf of the Government. The reason for this exclusion was the fact that the settlement between the parties had not yet been finalized. On September 12, 2019, the Court entered an Order pursuant to which Christine Stearns was dismissed, with prejudice, from this action in her individual capacity as relator. This dismissal did not constitute dismissal of claims brought by Stearns on behalf of the government.

Once the parties had finalized the settlement of this matter they filed a Stipulation of Dismissal on September 19, 2019 in which they sought a dismissal of the First Amended Complaint with prejudice. This Stipulation noted that the United States and the State of California had no objection to the dismissal of the First Amended Complaint with prejudice.

This Court entered an Order on October 7, 2019 in which the Court clarified the parties’ proposed Stipulation and Order and dismissed the First Amended Complaint and all remaining claims not previously dismissed with prejudice, but dismissed without prejudice the claims

brought by Stearns on behalf of the government. This clarification by the Court appears to have been a recognition of the qualification expressed by the government to the proposed dismissal of the claims of Christine Stearns.

The settlement between the parties is conditioned on the dismissal with prejudice of all claims, including the claims brought by Christine Stearns on behalf of the government. Given that the government has approved the settlement, they no longer require the clarification that the claims brought on their behalf by Christine Stearns be dismissed without prejudice. Both Assistant United States Attorney Vincente Tennerelli and Deputy Attorney General Kenneth Sugarman advised CET's attorney, Larry S. Gondelman, by e-mail on October 8, 2019, that they have no objection to the Court modifying its Order of October 7 to include the dismissal with prejudice of the claims brought by Christine Stearns on behalf of the government.

Therefore, the parties hereby Stipulate with the consent of the government that the Court should modify its October 7 Order and dismiss the First Amended Complaint with prejudice.

Respectfully submitted,

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**SO ORDERED:**

Dated: October 24, 2019.

  
UNITED STATES DISTRICT JUDGE