

1 BRIAN J. STRETCH (CABN 163973)  
 Acting United States Attorney  
 2 ALEX G. TSE (CABN 152348)  
 Chief, Civil Division  
 3 SARA WINSLOW (DCBN 457643)  
 MELANIE L. PROCTOR (CABN 228971)  
 4 Assistant United States Attorneys  
 450 Golden Gate Avenue, Box 36055  
 5 San Francisco, California 94102  
 Telephone: (415) 436-6925  
 6 Facsimile: (415) 436-6748  
 e-mail: [sara.winslow@usdoj.gov](mailto:sara.winslow@usdoj.gov)

7 Attorneys for the United States of America

8  
 9 UNITED STATES DISTRICT COURT  
 10 NORTHERN DISTRICT OF CALIFORNIA  
 11 SAN FRANCISCO DIVISION

12 UNITED STATES ex rel. BONNIE	) NO. CV 08-3411 WHA (DMR)
13 LAMMERS, M.D.,	)
	) <b>STIPULATION OF DISMISSAL;</b>
14 Plaintiff and Relator,	) <del>PROPOSED</del> ORDER
	)
15 v.	)
	)
16 FARIDEH HEIDARPOUR, et al.,	)
	)
17 Defendants.	)
	)

18  
 19 Subject to the Court’s approval, and pursuant to Fed. R. Civ. P. 41(a)(2), IT IS HEREBY  
 20 STIPULATED by the United States of America, qui tam Relator Bonnie Lammers, and Defendants  
 21 Michael Hebrard, M.D., Richard Lavigna, D.P.M., Advanced Physical Medicine & Rehab Group, Inc.,  
 22 Advanced Occupational Rehabilitation, Inc., Advanced Medicine and Rehabilitation of Texas, Inc., and  
 23 Advanced Medicine and Rehabilitation of Texas, P.A., that this action is dismissed with prejudice.

24 1. This action named nine Defendants. The three Defendants not listed above (Defendants  
 25 Farideh Heidarpour, Ali Heidarpour, and A.B.C. Billing, Inc.) were dismissed from this case  
 26 by Order dated September 8, 2015, after those Defendants paid the amounts due under their  
 27 August 28, 2013 settlement agreement.

1 2. The remaining Defendants have now paid the amounts due under their July 11, 2012  
2 settlement agreement, and they are being dismissed with prejudice, pursuant to the terms of  
3 the July 11, 2012 settlement agreement. Accordingly, the entire case is now being dismissed  
4 with prejudice.

5 IT IS SO STIPULATED.

6 Respectfully submitted,

7 BRIAN J. STRETCH  
8 Acting United States Attorney

9 Dated: February 1, 2016

10 By: \_\_\_\_\_/s/ signature on file  
11 SARA WINSLOW  
12 MELANIE L. PROCTOR  
13 Assistant United States Attorneys  
14 Attorneys for the United States

15 MCBREEN & SENIOR

16 Dated: February 1, 2016

17 By: \_\_\_\_\_/s/ signature on file  
18 MATTHEW WESTON  
19 Attorney for Relator

20 LAW OFFICES OF DENISE EATON-MAY

21 Dated: January 18, 2016

22 By: \_\_\_\_\_/s/ signature on file  
23 DENISE EATON MAY  
24 Attorney for Defendants Michael Hebrard, M.D.,  
25 Advanced Physical Medicine & Rehab Group, Inc.,  
26 Advanced Occupational Rehabilitation, Inc.,  
27 Advanced Medicine and Rehabilitation of Texas,  
28 Inc., and Advanced Medicine and Rehabilitation of  
Texas, P.A.

KNIGHT EMPLOYMENT LAW

Dated: January 21, 2016

By: \_\_\_\_\_/s/ signature on file  
CODY D. KNIGHT  
Attorney for Defendant Richard Lavigna, D.P.M.

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS HEREBY ORDERED that this action is dismissed with prejudice.

IT IS SO ORDERED.

Dated: February 2, 2016.



HONORABLE WILLIAM ALSUP  
United States District Judge

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28