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 6 Attorneys for Plaintiff/Relator Mary Kaye Welch

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 8 UNITED STATES DISTRICT COURT  
 9 FOR THE DISTRICT OF NEVADA  
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11 UNITED STATES OF AMERICA AND THE  
 12 STATE OF NEVADA *ex rel.* MARY KAYE  
 WELCH,

Case No. 2:14-cv-01786-MMD-GWF

**STIPULATION AND ~~PROPOSED~~ ORDER OF  
 DISMISSAL**

13 Plaintiffs,

14 v.

15 My Left Foot Children's therapy, LLC, et al.,

16 Defendants.  
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18 Relator Mary Kaye Welch ("Relator") filed this action under the *qui tam* provision of the False  
 19 Claims Act, 31 U.S.C. § 3729, *et seq.*, against Defendants My Left Foot Children's Therapy, LLC  
 20 ("My Left Foot"), Ann Marie Gottlieb, and Jon Gottlieb (collectively, "Defendants," and together with  
 21 Relator, the United States, and the State of Nevada, the "Parties"). The Parties by and through their  
 22 respective counsel, have reached a settlement in this case. Accordingly, there being no objection to the  
 23 relief sought, pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), the parties respectfully

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1 request that the Court enter the below [Proposed] Order.

2 IT IS SO STIPULATED.

3 DATED: \_\_\_\_\_ BY:  /s/ R. Scott Oswald  
4 R. Scott Oswald  
5 The Employment Law Group, P.C.  
6 Attorneys for Relator

7 DATED: \_\_\_\_\_ BY:  /s/ Troy Flake  
8 Troy Flake  
9 Office of the United States Attorney, District of Nevada  
10 Assistant United States Attorney

11 DATED: \_\_\_\_\_ BY:  /s/ Mark Kemberling  
12 Mark Kemberling  
13 State of Nevada, Office of the Attorney General,  
14 Chief Deputy Attorney General

15 DATED: Nov. 15, 2018 BY:  /s/ Shawn Hanson  
16 Shawn Hanson  
17 Akin Gump Strauss Hauer & Feld LLP  
18 Attorneys for Defendants  
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**ORDER**

IT IS THEREFORE ORDERED that:

1. The allegations in the operative complaint against Defendants are dismissed with prejudice as to the Relator, and are dismissed as to the United States and the State of Nevada consistent with the Settlement Agreement, with prejudice as to the “Covered Conduct” as defined in the Settlement Agreement and otherwise without prejudice;
2. The Court shall retain jurisdiction over any disputes that may arise regarding compliance with the Settlement Agreement; and
3. Having determined there is no just reason for delay, this Order shall be entered accordingly.

IT IS SO ORDERED.

Dated this 19<sup>th</sup> day of November 2018.



United States District Judge