

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 09-CV-22253-HUCK/O'SULLIVAN

UNITED STATES OF AMERICA, *ex rel.*
MARC OSHEROFF,

Plaintiff-Relator,

v.

TENET HEALTHCARE CORPORATION,
et al.,

Defendants.

JOINT STIPULATION OF DISMISSAL

The undersigned parties hereby jointly file this stipulation of dismissal of all claims brought by the United States of America (the "United States"), by and through qui tam relator Marc Osheroff (the "Relator"), against Defendants Tenet Healthcare Corporation, Tenet Healthsystem GB, Inc. d/b/a Atlanta Medical Center, Tenet South Fulton, Inc. d/b/a South Fulton Medical Center, Tenet Hialeah HealthSystem, Inc. d/b/a Hialeah Hospital, Lifemark Hospitals of Florida, Inc. d/b/a Palmetto General Hospital; Tenet HealthSystem North Shore, Inc. d/b/a North Shore Medical Center; Tenet HealthSystem North Shore, Inc. d/b/a North Shore Medical Center – FMC Campus, Tenet Good Samaritan, Inc. d/b/a Good Samaritan Medical Center; Tenet St. Mary's Inc., a Florida Corporation d/b/a St. Mary's Medical Center, Brookwood Center Development Corporation, Eastern Professional Properties, Inc., AMISUB (SFH), Inc. d/b/a Saint Francis Hospital, Tenet Hospitals Limited, a Texas Limited Partnership d/b/a Doctors Hospital at White Rock Lake, San Ramon Regional Medical Center, Inc. d/b/a San Ramon Regional Medical Center, and Los Alamitos Medical Center (collectively, the "Defendants").

The United States, the Relator, and Defendants (collectively, the “Parties”) have entered into a Settlement Agreement that resolves all claims brought in this action. Accordingly, the Parties file this stipulation of dismissal of all claims and request that the Court enter an order of dismissal with respect to all claims asserted in the Second Amended Complaint against Defendants.

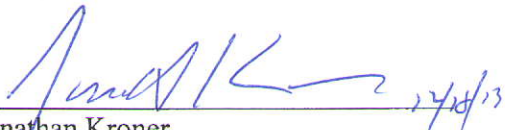
With respect to the United States, claims are dismissed with prejudice only to the extent that the claims were released in paragraph 4 of the Settlement Agreement. Any remaining claims are dismissed without prejudice to the United States.

With respect to the States of Florida, Georgia, Texas, Tennessee and California which have declined to intervene in this case, all claims are dismissed without prejudice. The States of Florida, Georgia, Texas, Tennessee and California consent to dismissal of the state claims without prejudice to those respective states.


With respect to the Relator, all claims asserted in the Second Amended Complaint are dismissed with prejudice.

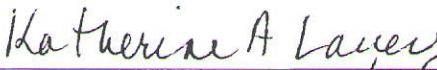
Dated: December ____, 2013.

Respectfully submitted,


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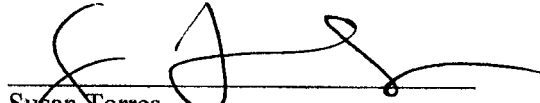

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was electronically filed and served through the Court's Electronic Case Filing (ECF) System and to all counsel of record on December __, 2013:

D-2215536_1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

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UNITED STATES OF AMERICA, *ex rel.*
MARC OSHEROFF,

Plaintiff-Relator,

v.

TENET HEALTHCARE CORPORATION,
et al.,

Defendants.

[PROPOSED] ORDER OF DISMISSAL

The United States, the Relator and the Defendants have filed a Joint Stipulation of Dismissal as to all claims in this action against Defendants Tenet Healthcare Corporation, Tenet Healthsystem GB, Inc. d/b/a Atlanta Medical Center, Tenet South Fulton, Inc. d/b/a South Fulton Medical Center, Tenet Hialeah HealthSystem, Inc. d/b/a Hialeah Hospital, Lifemark Hospitals of Florida, Inc. d/b/a Palmetto General Hospital; Tenet HealthSystem North Shore, Inc. d/b/a North Shore Medical Center; Tenet HealthSystem North Shore, Inc. d/b/a North Shore Medical Center – FMC Campus, Tenet Good Samaritan, Inc. d/b/a Good Samaritan Medical Center; Tenet St. Mary's Inc., a Florida Corporation d/b/a St. Mary's Medical Center, Brookwood Center Development Corporation, Eastern Professional Properties, Inc., AMISUB (SFH), Inc. d/b/a Saint Francis Hospital, Tenet Hospitals Limited, a Texas Limited Partnership d/b/a Doctors Hospital at White Rock Lake, San Ramon Regional Medical Center, Inc. d/b/a San Ramon Regional Medical Center, and Los Alamitos Medical Center (collectively, the "Defendants").

The United States, the Relator and the Defendants (collectively, the “Parties”) have entered into a Settlement Agreement resolving all claims in this action and have filed a Joint Stipulation of Dismissal requesting that this Court dismiss all claims brought against Defendants in this action. Accordingly, upon due consideration of the Agreed Motion for Dismissal,

IT IS ORDERED that:

1. All claims asserted against the Defendants shall be dismissed.
2. With respect to the United States, all claims are dismissed with prejudice only to the extent that the claims were released in paragraph 4 of the Settlement Agreement. Any remaining claims are dismissed without prejudice as to the United States.
3. With respect to the States of Florida, Georgia, Texas, Tennessee and California which have declined to intervene, all claims are dismissed without prejudice.
4. With respect to the Relator, all claims are dismissed with prejudice.

IT IS SO ORDERED,

This ____ day of December, 2013.

HONORABLE PAUL C. HUCK
UNITED STATES DISTRICT JUDGE