

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA <i>ex rel.</i>)	
LAURA LAPORTE, ANGELA DAVENPORT,)	
PAMELA HONE, ROBERT BIASELLI,)	Civil Action No.:
KELLI J. AMAYA, AMANDA KENNY, and)	1:11-CV-03523(RBK)(AMD)
DORIS MOODY,)	
)	
)	
<i>Plaintiffs,</i>)	
v.)	
)	
)	
PREMIER EDUCATION GROUP, L.P. and)	
PREMIER EDUCATION GROUP, G.P., INC.)	
d/b/a HARRIS SCHOOL OF BUSINESS,)	
BRANFORD HALL CAREER INSTITUTE,)	
SALTER COLLEGE, THE SALTER SCHOOL,)	[Filed Electronically]
SEACOAST CAREER SCHOOLS, SUBURBAN)	
TECHNICAL SCHOOL; and JOHN DOES)	
NOS. 1-50, FICTITIOUS NAMES,)	
)	
<i>Defendants.</i>)	

STIPULATION OF DISMISSAL

WHEREAS, the Court issued decisions in this action, *inter alia*, *U.S. ex rel. LaPorte v. Premier Educ. Grp., L.P.*, 2014 WL 5449745 (D.N.J. Oct. 27, 2014) and *U.S. ex rel. LaPorte v. Premier Educ. Grp., L.P.*, 2016 WL 2747195 (D.N.J. May 11, 2016), granting Defendants' motion to dismiss individual claims of certain Relator Plaintiffs and granting in part and denying in part Defendants' Motion to Dismiss the *qui tam* False Claims Act claims set forth in a Fourth Amended Complaint;

WHEREAS, the surviving claims in the Fourth Amended Complaint (the "Complaint") concerning certain specified conduct by Defendants at the Harris School of Business, Branford

Hall Career Institute, Salter College, The Salter School, Seacoast Career Schools and Suburban Technical School campuses shall constitute the "Covered Conduct.";


IT IS HEREBY STIPULATED AND AGREED, by and among Plaintiff United States of America, Plaintiffs/Relators Laura LaPorte, Angela Davenport, Pamela Hone, Robert Biaselli, Kelli J. Amaya, Amanda Kenny, and Doris Moody, Defendants Premier Education Group, L.P. and Premier Education Group, G.P., Inc. d/b/a Harris School of Business, Branford Hall Career Institute, Salter College, the Salter School, Seacoast Career Schools, Suburban Technical School (collectively referred to herein as the "Parties"), that pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure and 31 U.S.C. § 3730(b)(1), the Parties hereby stipulate to the dismissal of the Complaint and this action against all Defendants with prejudice as to Relators, and with prejudice as to the United States as to the "Covered Conduct".

The parties respectfully request that the Court enter an order in the form of the proposed order attached.

THE UNITED STATES OF AMERICA

CRAIG CARPENITO
United States Attorney

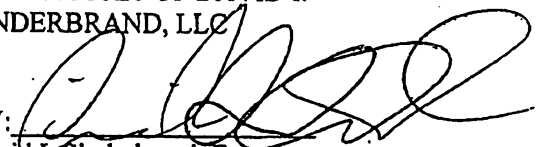
DATED: 7/12/19

BY: 
David E. Dauenheimer
Assistant United States Attorney
United States Attorney's Office
District of New Jersey

RELATORS' COUNSEL

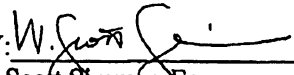
LAW OFFICES OF DAVID I.
SINDERBRAND, LLC

DATED: July 11, 2019

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DATED: July 11, 2019

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DATED: July 12, 2019


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**PREMIER EDUCATION GROUP, L.P. and
PREMIER EDUCATION GROUP, G.P., INC. d/b/a
Harris School of Business, Branford Hall Career
Institute, Salter College, The Salter School, Seacoast
Career Schools and Suburban Technical School**

MELTZER, LIPPE, GOLDSTEIN & BREITSTONE, LLP

DATED: 7/12/19

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)
<i>Defendants.</i>)

ORDER

WHEREAS, the Court issued decisions in this action, *inter alia*, *U.S. ex rel. LaPorte v. Premier Educ. Grp., L.P.*, 2014 WL 5449745 (D.N.J. Oct. 27, 2014) and *U.S. ex rel. LaPorte v. Premier Educ. Grp., L.P.*, 2016 WL 2747195 (D.N.J. May 11, 2016), granting Defendants' motion to dismiss individual claims of certain Relator Plaintiffs and granting in part and denying in part Defendants' Motion to Dismiss the *qui tam* False Claims Act claims set forth in a Fourth Amended Complaint;

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Hall Career Institute, Salter College, The Salter School, Seacoast Career Schools and Suburban Technical School campuses shall constitute the “Covered Conduct”;

IT IS HEREBY ORDERED that the Complaint filed in the United States District Court for the District of New Jersey captioned *U.S. ex rel. LaPorte et al. v. Premier Educ. Grp., L.P. et al.*, Case No. 11-cv-3523 (D.N.J.) and this action shall be dismissed against all Defendants with prejudice as to Relators, and with prejudice as to the United States as to the “Covered Conduct”.

SO ORDERED.

HON. ROBERT B. KUGLER

Dated this ___ day of _____, 2019.