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3 **UNITED STATES DISTRICT COURT**  
4 **DISTRICT OF ARIZONA**

5 United States of America, ex. rel. Michelle  
6 MacKillop,

7 Plaintiff-Relator,

8 V.

9 Grand Canyon Education, Inc.; GC  
10 Education, Inc. f/k/a Grand Canyon  
11 University, Inc.; and Grand Canyon  
12 University f/k/a Gazelle University,

13 Defendants.

Case No. 2:23-cv-00467-DWL

**JOINT STIPULATION OF  
DISMISSAL**

14 Pursuant to Federal Rule of Civil Procedure 41 (a)(1)(A)(ii), the qui tam provisions of  
15 the False Claims Act, 31 U.S.C. § 3730(b)(1), and the terms and conditions of their November  
16 24, 2025 settlement agreement, Relator Michelle Mackillop and Defendants Grand Canyon  
17 University and Grand Canyon Education, Inc. (the “parties”), by and through their respective  
18 counsel, hereby agree and stipulate to the entry of an order dismissing this matter with  
19 prejudice to Relator and without prejudice to the United States. For the reasons set forth in the  
20 Joint Statement in Response to Doc. 313 (Doc. 316) and further discussed at the November  
21 19, 2025 status conference, the United States consents to this dismissal.

22 The parties therefore respectfully request that the Court enter an order of dismissal, with  
23 prejudice to Relator and without prejudice to the United States.

24 Respectfully submitted this 22nd day of December 2025.

25 /s/ Chandra Napora

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12 **CERTIFICATE OF SERVICE**

13 I, Chandra Napora, hereby certify that on this 22nd day of December 2025, I filed the  
14 foregoing document using the Court's CM/ECF system, resulting in service on all counsel of  
15 record in this matter.

16 /s/ Chandra Napora  
17 Chandra Napora  
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