UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA, ex rel. DINESH S. THAKUR, et al.

Plaintiffs,

FILED UNDER SEAL Civil No. JFM-07-962

RANBAXY USA, INC., et al.,

Defendants.

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UNITED STATES' NOTICE OF INTERVENTION FOR PURPOSES OF SETTLEMENT

The United States of America, by its undersigned counsel, hereby elects to intervene in this action, pursuant to 31 U.S.C. § 3730(b), for purposes of settlement and for cause states as follows:

- 1. As referenced in the Government's prior filings, the United States, Relator, and Defendants have reached an agreement to resolve this action. In light of this agreement, and for the purpose of formalizing that resolution, pursuant to the False Claims Act, 31 U.S.C. §§ 3730(b, the United States advises the Court of its decision to intervene in this matter for the purposes of settlement. The Plaintiff States have authorized the United States to inform the Court that the Plaintiff States also intervene in this action for the purposes of settlement.
- 2. Under the terms and conditions of the Settlement Agreement among the parties, which is attached hereto, the United States and Relator will file a Stipulation of Dismissal with respect to all claims in this action following the payment of the settlement amount.

- 3. In light of the proposed resolution of this case, the United States does not presently intend to file a complaint in intervention but reserves the right to seek leave to file such a complaint in the event the settlement is breached.
- Amended Complaints, this Notice, and the attached proposed Order be unsealed. The United States requests that all other papers on file in this action remain under seal because in discussing the content and extent of the United States' parallel criminal and civil investigation, such papers are provided by law to the Court alone for the sole purpose of evaluating whether the seal and time for making an election to intervene should be extended.
- 5. The United States respectfully requests that this action remain under seal until May 13, 2013, when a proceeding is scheduled before this Court.

A proposed Order accompanies this notice.

Respectfully submitted,

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Upited States Attorney

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Dated: May 10, 2013