

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA, *ex rel.*

Plaintiff,

v.

NOUR USA, INC., et al.,

Defendants.

Civil Action No. 1:12-cv-01308 (JDB)

**FILED UNDER SEAL**

**RELATORS' MOTION TO VOLUNTARILY DISMISS WITHOUT PREJUDICE**

Relators [REDACTED] through counsel, pursuant to Federal Rule of Civil Procedure 41(a) and 31 U.S.C. § 3730(b)(1), move this Court to dismiss the above-captioned action without prejudice. Relators move to dismiss this action because they do not have the resources to pursue the claims in this case without the government's intervention. The government has filed a notice informing this Court that it does not intend to intervene in this action. In addition, for the reasons stated in their Memorandum in Support of Relators' Motion to Seal or, in the Alternative, to Redact All Identifying Information, and their Memorandum in Support of Relators' Motion to Redact Identifying Information [ECF No. 11], Relators fear for the safety and health of their families and themselves if they pursue this action without the government's intervention.

The government has represented that it will consent to the dismissal of this case. Pursuant to 31 U.S.C. § 3730(b)(1), the government will file separately its written consent to dismissal and its reasons for consenting.

A proposed order is attached.

Dated: July 8, 2014

Respectfully submitted,



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Counsel for Relators   


**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing Relators' Motion to Voluntarily Dismiss Without Prejudice was served via email and the United States mail on this 8th day of July, 2014 on the following:

Mr. Gordon Jones  
United States Department of Justice, Civil Division  
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Ms. Jennifer Short  
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Blair G. Brown



those concerns specific and significant; and (5) the complaint has not been served on any of the defendants.

Accordingly, it is FURTHER ORDERED that:

(1) The Clerk of Court shall DISMISS the above-captioned action WITHOUT PREJUDICE.

(2) The Clerk of Court shall publish the redacted version of this Order, which is attached as Exhibit 5, to the Proposed Order Granting Relators' Motion to Redact Identifying Information. This unredacted version of the Order shall remain under seal.

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The Honorable John D. Bates

**To the Clerk: Please send copies of the foregoing Order to:**

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**and**

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