

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

UNITED STATES OF AMERICA	)	
<i>ex rel.</i> RIBIK, SLOUGH, <i>and</i> CARSON	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
HCR MANORCARE INC, MANOR	)	
CARE INC, HCR MANORCARE	)	
SERVICES LLC, and HEARTLAND	)	
EMPLOYMENT SERVICES LLC,	)	
	)	
Defendants.	)	

CIVIL ACTION NUMBERS:  
1:09cv13 (CMH/TCB)  
1:14cv1228 (CMH/TCB)  
1:11cv1054 (CMH/TCB)

**UNITED STATES AND MANORCARE’S JOINT MOTION  
TO CONTINUE SUMMARY JUDGMENT HEARING AND  
STAY ALL DEADLINES**

Plaintiff United States of America and Defendants HCR ManorCare, Inc., Manor Care, Inc., HCR ManorCare Services, LLC, and Heartland Employment Services, LLC, (“ManorCare” or “Defendants”), through their respective undersigned counsel, hereby respectfully move for an order continuing the summary judgment hearing that is scheduled for November 9, 2017, and suspending all other deadlines in this matter.<sup>1</sup> In support of this motion, the United States and ManorCare state as follows:

1. The Court is currently scheduled to hear argument on Defendants’ Motion for Summary Judgment, Dkt. No. 630, Relator Christine Ribik’s Motion for Partial Summary Judgment, Dkt. No. 624, and Defendants’ Motion for Sanctions Regarding the United

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<sup>1</sup> Counsel for Relator Christine Ribik and Counsel for Relator Marie Slough have indicated that they intend to oppose this motion.

States Improper Opposition to Defendants' Motion for Summary Judgment, Dkt. No. 678, on November 9, 2017, at 10 a.m.

2. The United States has advised Defendants of its intent to move to dismiss this case with prejudice.
3. Defendants have advised the United States of their intent not to seek from the United States any fees and expenses in connection with this matter.
4. The United States and Manor Care are working on the documents to effectuate these actions.
5. The United States and ManorCare respectfully request that the Court continue the summary judgment hearing currently scheduled for November 9, 2017, because any such hearing would be a waste of the Court's resources.
6. The United States and ManorCare further request that Court stay the November 13, 2017, deadline for the United States to file Objections to the Magistrate's October 27, 2017 Order, Dkt. No. 663, the November 17, 2017, deadline for pre-trial filings, and all other deadlines in this matter, until further notice.
7. The United States and ManorCare will file a notice of dismissal by Friday, November 17, 2017, or in the alternative will file a status report with the Court by that date.
8. A proposed Order is attached hereto.

Respectfully submitted,

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/s/  
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Employment Services LLC*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on November 8, 2017, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (“NEF”) to the following.

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