

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

UNITED STATES ex rel. DEBORAH W. COOK,)
)

Plaintiff,)

v.)

ENERGY & PROCESS CORPORATION,)
)

Defendant.)
)

Civil Action File No.:
1:13-cv-04023-SCJ

**DEFENDANT’S RESPONSE OF NON-OPPOSITION TO RELATOR’S
PETITION FOR A LIMITED TWO (2) WEEK STAY OF PROCEEDINGS**

Defendant Energy & Process Corporation (“E&P”) responds to Relator’s Petition for a Limited Two (2) Week Stay of Proceedings, (Dkt. 50), as follows:

1. Relator is correct that E&P and the United States have reached an agreement to settle this matter. E&P also understands that the settlement amount is also acceptable to the Relator.

2. E&P and Relator have not reached an agreement on Relator’s claim for reasonable attorneys’ fees and costs, including because E&P only received the supporting invoices for that claim last Friday, March 31, 2017.

3. E&P has no objection to Relator's request for a two-week stay of litigation, which will provide E&P and Relator time to reach an agreement on Relator's claim for reasonable attorneys' fees and costs. E&P anticipates that, in accordance with a finalized settlement agreement, this matter will be dismissed in its entirety before the expiration of the requested stay.

[Signature appears on the following page.]

Respectfully submitted this 6th day of April 2017.

s/ Andrew A. Stulce

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*Applications for Admission
pro hac vice forthcoming.

**Admitted *Pro Hac Vice*

***Attorneys for Energy & Process
Corporation***

CERTIFICATE OF COMPLIANCE PURSUANT TO L.R. 7.1D, NDGa

The undersigned counsel hereby certifies that the foregoing has been prepared using one of the font and point selections approved in LR 5.1, NDGa.

This 6th day of April 2017.

s/ Andrew A. Stulce

Andrew A. Stulce

CERTIFICATE OF SERVICE

The undersigned counsel certifies that a true and correct copy of **DEFENDANT'S RESPONSE OF NON-OPPOSITION TO RELATOR'S PETITION FOR LIMITED TWO (2) WEEK STAY OF PROCEEDINGS** was filed electronically with the Court. Notice of this filing will be sent to all counsel of record via the Court's CM/ECF filing system.

This 6th day of April 2017.

s/ Andrew A. Stulce

Andrew A. Stulce