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UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF PENNSYLVANIA

U.S. v. City of Philadelphia

UNITED STATES OF AMERICA,



NH-PA-002-002

Plaintiff,

v.

Civ. No. 98-4253

THE CITY OF PHILADELPHIA; EDWARD  
G. RENDELL, MAYOR OF THE CITY OF  
PHILADELPHIA; ESTELLE B. RICHMAN,  
COMMISSIONER, HEALTH DEPARTMENT;  
EPISCOPAL LONG TERM CARE, AS  
OPERATORS OF THE PHILADELPHIA  
NURSING HOME,

Defendants.

**UNITED STATES' UNCONTESTED MOTION  
TO ENTER SETTLEMENT AGREEMENT**

The United States of America, by and through counsel, hereby moves the Court to approve and enter the Settlement Agreement in this matter, which is being filed contemporaneously with the Complaint and this Motion. This Motion is uncontested.

This case was instituted by the United States pursuant to the Civil Rights of Institutionalized Persons Act ("CRIPA"), 42 U.S.C. § 1997, and pursuant to the False Claims Act, 31 U.S.C. § 3729 et seq.

For the purpose of avoiding protracted and adversarial litigation, the parties entering into this Settlement Agreement agree to the provisions set forth herein. The parties agree that the provisions of the Settlement Agreement are a lawful, fair and appropriate resolution of this case.

Therefore, the United States hereby respectfully requests that the Court approve the accompanying Settlement Agreement and enter it as an Order of the Court.

Respectfully submitted,

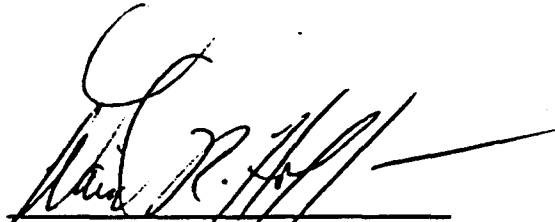
**MICHAEL R. STILES**  
United States Attorney  
Eastern District of  
Pennsylvania


**BILL LANN LEE**  
Acting Assistant  
Attorney General  
Civil Rights Division

**JAMES G. SHEEHAN**  
Assistant U.S. Attorney  
Chief, Civil Division  
Eastern District of  
Pennsylvania

**STEVEN H. ROSENBAUM**  
Chief  
Special Litigation Section

**ROBINSUE FROHBOESE**  
Deputy Chief  
Special Litigation Section

  
\_\_\_\_\_  
**DAVID R. HOFFMAN**  
Assistant U.S. Attorney  
Eastern District of  
Pennsylvania  
615 Chestnut Street  
Suite 1250  
Philadelphia, PA 19106  
(215) 451-5337

  
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**RICHARD J. FARANO**  
Senior Trial Attorney  
U.S. Department of Justice  
Civil Rights Division  
Special Litigation Section  
P.O. Box 66400  
Washington, DC 20035-6400  
(202) 307-3116

CERTIFICATE OF SERVICE

I, David R. Hoffman, Assistant United States Attorney, hereby certify that a true and correct copy of the within United States' Uncontested Motion to Enter Settlement Agreement was sent via first class mail to:

Lewis Morris  
Assistant Inspector General for Legal Affairs  
U.S. Dept. of Health and Human Services  
330 Independence Ave., S.W.  
Washington, D.C. 20201

Stephanie. L. Franklin-Suber  
Philadelphia City Solicitor  
Law Department  
1515 Arch Street, 17th Floor  
Philadelphia, PA 19102

Mark H. Gallant, Esq.  
Cozen & O'Connor  
1900 Market Street  
Philadelphia, PA 19103

  
\_\_\_\_\_  
DAVID R. HOFFMAN  
Assistant United States Attorney

Date: August 13, 1998