

Exhibit B -

**Stipulation for Entry of Consent
Judgment Against Dr. Siva and
the Siva PC**

1 BRIAN M. BOYNTON
Acting Assistant Attorney General, Civil Division

2 TRACY L. WILKISON
Acting United States Attorney

3 DAVID M. HARRIS, AUSA
Chief, Civil Division

4 DAVID K. BARRETT, AUSA
Chief, Civil Fraud Section

5 ABRAHAM MELTZER, AUSA
Deputy Chief, Civil Fraud Section

6 California State Bar No. 162659
Room 7516, Federal Building

7 300 N. Los Angeles Street
Los Angeles, California 90012

8 T: 213.894.7155|F: 213.894.7819
Email: abraham.meltzer@usdoj.gov

9 JAMIE ANN YAVELBERG

ROBERT J. McAULIFFE

10 MARIE V. BONKOWSKI

Attorneys, Civil Division

11 United States Department of Justice

175 N Street, NE, Room 9.214

Washington, D.C. 20002

12 T: 202.514.6833|F: 202.616.3085

13 Email: marie.v.bonkowski@usdoj.gov

Attorneys for the

14 United States of America

15 UNITED STATES DISTRICT COURT

16 FOR THE CENTRAL DISTRICT OF CALIFORNIA

17 WESTERN DIVISION

18
19 UNITED STATES OF AMERICA and
STATE OF CALIFORNIA *ex rel.*
20 MARTIN MANSUKHANI,

21 Plaintiffs,

22 v.

23 PRIME HEALTHCARE SERVICES,
INC.; PRIME HEALTHCARE
24 FOUNDATION, INC.; PRIME
HEALTHCARE MANAGEMENT,
25 INC.; DESERT VALLEY HOSPITAL;
HIGH DESERT HEART VASCULAR
26 INSTITUTE, a California Professional
Medical Corporation; PREM REDDY,
27 M.D., FACC; HIGH DESERT HEART
INSTITUTE MEDICAL
28 CORPORATION; A&A SURGERY

No. 5:18-cv-00371-RGK-SHK

STIPULATION FOR ENTRY OF
CONSENT JUDGMENT AGAINST
DEFENDANTS SIVA ARUNASALAM,
M.D., an individual, AND SIVA
ARUNASALAM, M.D., a Professional
Medical Corporation

1 CENTER, a Medical Corporation; SIVA
2 ARUNASALAM, M.D.; and SIVA
3 ARUNASALAM, M.D., a Professional
4 Medical Corporation,

Defendants.

5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 *Qui tam* plaintiff Martin Mansukhani (“Relator”); real party in interest the United
2 States of America, acting through the United States Department of Justice and on behalf
3 of the Office of Inspector General (“HHS-OIG”) of the Department of Health and
4 Human Services (“HHS”) (collectively, the “United States”); real party in interest the
5 State of California (“California”); and defendants Siva Arunasalam, M.D., an individual,
6 and Siva Arunasalam, M.D., a Professional Medical Corporation (collectively, “Dr.
7 Siva”), through their respective counsel, hereby stipulate and agree as follows:

8 1. This Court has subject matter jurisdiction over this action pursuant to 31
9 U.S.C. §§ 3732(a) and (b) and 28 U.S.C. §§ 1331 and 1345.

10 2. The Court has personal jurisdiction over Defendants in this action.

11 3. Venue is proper in the Central District of California under 31 U.S.C.
12 § 3732(a) and 28 U.S.C. § 1391(b) because Defendants reside in and transact business in
13 this District and because a substantial part of the events giving rise to the claims brought
14 in this action occurred in this District.

15 4. Relator, the United States, California, and Dr. Siva (collectively, the
16 “Parties”) agree to all matters set forth in the proposed Consent Judgment against Dr.
17 Siva, attached to this stipulation as Exhibit 1 (the “Consent Judgment”). A copy of the
18 Consent Judgment is lodged with this stipulation.

19 5. The Court may immediately sign and enter the Consent Judgment without
20 further notice or hearing.

21 6. Pursuant to a Settlement Agreement entered into by the Parties on May __,
22 2021 (the “Effective Date”), Dr. Siva shall pay to the United States and California a total
23 of \$2,000,000.00 (the “Settlement Amount”), of which \$1,000,000.00 is restitution, plus
24 applicable interest as described below. Dr. Siva shall pay the following amounts to the
25 United States and California under the following terms and conditions:

- 26 a. No later than ten (10) business days after the Effective Date of the
27 Settlement Agreement, Dr. Siva shall pay the United States
28 \$95,000.00;

- 1 b. No later than ten (10) business days after the Effective Date of the
2 Settlement Agreement, Dr. Siva shall pay California \$5,000.00;
- 3 c. No later than 180 calendar days after the Effective Date of the
4 Settlement Agreement, Dr. Siva shall pay the United States
5 \$1,805,000.00 plus accrued interest at a rate of 0.75% simple annual
6 interest from the Effective Date of the Settlement Agreement;
- 7 d. No later than 180 calendar days after the Effective Date of the
8 Settlement Agreement, Dr. Siva shall pay California \$95,000.00 plus
9 accrued interest at a rate of 0.75% simple annual interest from the
10 Effective Date of the Settlement Agreement;
- 11 e. The above defined payments to the United States (the “Federal
12 Settlement Amount”) shall be made by electronic funds transfer
13 pursuant to written instructions provided by the Office of the United
14 States Attorney for the Central District of California;
- 15 f. The above defined payments to California (the “California Settlement
16 Amount”) shall be made by electronic funds transfer pursuant to
17 written instructions provided by the California Attorney General’s
18 Office; and
- 19 g. The above defined payments may be prepaid, in whole or in part,
20 without penalty.

21 7. The Settlement Amount shall not be discharged by means of a voluntary or
22 involuntary bankruptcy or any other type of insolvency proceeding under the laws of the
23 United States, including but not limited to 11 U.S.C. § 101, *et seq.*, or under the laws of
24 any state or locality. The Parties agree that the Consent Judgment is for a judgment
25 under the False Claims Act, 31 U.S.C. §§ 3729-3733 (“FCA”) and the California False
26 Claims Act, California Government Code §§ 12650-12656 (“CFCA”) in favor of
27 Relator, the United States, and California. Further, the Parties acknowledge that a
28 judgment entered in an FCA and CFCA action in which the United States and California

1 did not intervene is a judgment for the Relator, the United States, and California, as the
2 United States and California are the real parties in interest in *qui tam* actions filed under
3 the FCA and CFCA.

4 8. As long as Dr. Siva makes the payments in the full amounts, and on or
5 before the specified dates as set forth in Paragraph 6 above, neither the United States nor
6 California shall execute on the Consent Judgment. But if Dr. Siva fails to make any
7 payment under the terms described in Paragraph 6, then (a) the full Settlement Amount
8 shall be immediately due and payable, (b) the United States shall have the right to
9 immediately execute on the Consent Judgment for the full remaining unpaid balance of
10 the Federal Settlement Amount, (c) California shall have the right to immediately
11 execute on the Consent Judgment for the full remaining unpaid balance of the California
12 Settlement Amount, and (d) Dr. Siva shall be liable to the United States and California
13 for all costs, fees, and expenses, including but not limited to attorney's fees, incurred by
14 the United States and California in connection with enforcing this Consent Judgment.

15 9. In the event that Dr. Siva fails to pay any amount as provided in Paragraph
16 6 within ten (10) business days of the date on which such payment is due, Dr. Siva shall
17 be in default of his payment obligations ("Default"). In the event of such Default, HHS-
18 OIG may exclude Dr. Siva from participating in all federal health care programs until
19 Dr. Siva pays the full Settlement Amount and reasonable costs and expenses as set forth
20 above. HHS-OIG will provide written notice of any such exclusion to Dr. Siva. Dr.
21 Siva waives any further notice of the exclusion under 42 U.S.C. § 1320a-7(b)(7) and
22 agrees not to contest such exclusion either administratively or in any state or federal
23 court. Reinstatement to program participation is not automatic. If at the end of the
24 period of exclusion Dr. Siva wishes to apply for reinstatement, Dr. Siva must submit a
25 written request for reinstatement to HHS-OIG in accordance with the provisions of 42
26 C.F.R. §§ 1001.3001-3005. Dr. Siva will not be reinstated unless and until HHS-OIG
27 approves such request for reinstatement.

1 10. When Dr. Siva fully pays the Federal Settlement Amount to the United
2 States, the United States shall prepare and file a Satisfaction of Judgment as to the
3 United States with the Clerk for the United States District Court for the Central District
4 of California. If any lien has been recorded by the United States, the United States shall
5 provide Dr. Siva with a Release of Lien Under Abstract of Judgment, which may be
6 recorded in the applicable County Recorder's office.

7 11. When Dr. Siva fully pays the California Settlement Amount to California,
8 California shall prepare and file a Satisfaction of Judgment as to California with the
9 Clerk for the United States District Court for the Central District of California. If any
10 lien has been recorded by California, California shall provide Dr. Siva with a Release of
11 Lien Under Abstract of Judgment, which may be recorded in the applicable County
12 Recorder's office.

13 12. When Dr. Siva fully pays the Federal and California Settlement Amounts,
14 Relator Mansukhani shall prepare and file a Satisfaction of Judgment as to Relator with
15 the Clerk for the United States District Court for the Central District of California. If
16 any lien has been recorded by Relator, Relator shall provide Dr. Siva with a Release of
17 Lien Under Abstract of Judgment, which may be recorded in the applicable County
18 Recorder's office.

19 13. Dr. Siva shall not charge back to the United States or California on any
20 contract (including as a direct or indirect cost), or otherwise seek payment or
21 reimbursement from the United States or California, for any portion of the Settlement
22 Amount.

23 14. For purposes other than entering the Consent Judgment in this action, this
24 Stipulation is neither an admission of liability by Dr. Siva, nor is it a concession by the
25 United States and California that their claims are not well founded.

26 15. This Stipulation has been drafted by all the Parties and shall not, therefore,
27 be construed against any Party for that reason in any subsequent dispute.
28

1 16. This Stipulation shall not be amended except by written consent of the
2 Parties.

3 17. This Court shall retain jurisdiction to adjudicate disputes arising under this
4 Stipulation. Such disputes may be raised with the Court by motion.

5 18. Once Dr. Siva has fully paid the Settlement Amount, and the Satisfactions
6 of Judgment of the United States, California, and Relator are filed with the Clerk for the
7 United States District Court for the Central District of California, Relator and Dr. Siva
8 shall file a Joint Stipulation of Dismissal of the above-entitled action as to Dr. Siva. The
9 dismissals of the United States' and California's claims will be with prejudice only as to
10 the Covered Conduct as defined in the Settlement Agreement, and will be without
11 prejudice as to all other allegations. The dismissal by Relator will be with prejudice as
12 to the entire action.

13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1
2 SO STIPULATED AND RESPECTFULLY SUBMITTED:

3 THE UNITED STATES OF AMERICA

4
5 DATED: _ May 18, 2021

6 TRACY L. WILKISON
7 Acting United States Attorney
8 DAVID M. HARRIS, AUSA
9 Chief, Civil Division
10 DAVID K. BARRETT, AUSA
11 Chief, Civil Fraud Section

12 

13

14 ABRAHAM C. MELTZER
15 Assistant United States Attorney
16 Deputy Chief, Civil Fraud Section
17 Attorneys for the United States of America

18
19 DATED: _____, 2021

20 BRIAN M. BOYNTON
21 Acting Assistant Attorney General, Civil Division
22 JAMIE ANN YAVELBERG
23 ROBERT J. McAULIFFE

24

25 MARIE V. BONKOWSKI
26 Senior Trial Counsel
27 United States Department of Justice
28 Civil Division/Fraud Section
Attorneys for the United States of America

29
30 DATED: _____, 2021

31

32 LISA M. RE
33 Assistant Inspector General for Legal Affairs
34 Office of Counsel to the Inspector General
35 Office of Inspector General
36 United States Department of
37 Health and Human Services

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

SO STIPULATED AND RESPECTFULLY SUBMITTED:

THE UNITED STATES OF AMERICA

DATED: _____, 2021

TRACY L. WILKISON
Acting United States Attorney
DAVID M. HARRIS, AUSA
Chief, Civil Division
DAVID K. BARRETT, AUSA
Chief, Civil Fraud Section

ABRAHAM C. MELTZER
Assistant United States Attorney
Deputy Chief, Civil Fraud Section
Attorneys for the United States of America

DATED: May 24, 2021

BRIAN M. BOYNTON
Acting Assistant Attorney General, Civil Division
JAMIE ANN YAVELBERG
ROBERT J. McAULIFFE

Marie V. Bonkowski

MARIE V. BONKOWSKI
Senior Trial Counsel
United States Department of Justice
Civil Division/Fraud Section
Attorneys for the United States of America

DATED: _____, 2021

LISA M. RE
Assistant Inspector General for Legal Affairs
Office of Counsel to the Inspector General
Office of Inspector General
United States Department of
Health and Human Services

1
2 SO STIPULATED AND RESPECTFULLY SUBMITTED:

3 THE UNITED STATES OF AMERICA

4
5 DATED: _____, 2021

6 TRACY L. WILKISON
7 Acting United States Attorney
8 DAVID M. HARRIS, AUSA
9 Chief, Civil Division
10 DAVID K. BARRETT, AUSA
11 Chief, Civil Fraud Section

12
13 _____
14 ABRAHAM C. MELTZER
15 Assistant United States Attorney
16 Deputy Chief, Civil Fraud Section
17 Attorneys for the United States of America

18
19 DATED: _____, 2021

20 BRIAN M. BOYNTON
21 Acting Assistant Attorney General, Civil Division
22 JAMIE ANN YAVELBERG
23 ROBERT J. McAULIFFE

24
25 _____
26 MARIE V. BONKOWSKI
27 Senior Trial Counsel
28 United States Department of Justice
Civil Division/Fraud Section
Attorneys for the United States of America

29 DATED: May 26, 2021

30
31 _____
32 Lisa M. Re
33 LISA M. RE
34 Assistant Inspector General for Legal Affairs
35 Office of Counsel to the Inspector General
36 Office of Inspector General
37 United States Department of
38 Health and Human Services

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

THE STATE OF CALIFORNIA

DATED: May 18, 2021

ROB BONTA
Attorney General for the State of California



NICHOLAS PAUL
Senior Assistant Attorney General
California Department of Justice
Division of Medi-Cal Fraud & Elder Abuse

MARTIN MANSUKHANI – RELATOR

DATED: _____, 2021

COTCHETT PITRE & McCARTHY LLP

JUSTIN BERGER
Attorneys for Relator Martin Mansukhani

DATED: _____, 2021

PHILLIPS & COHEN LLP

EDWARD H. ARENS
Attorneys for Relator Martin Mansukhani

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

THE STATE OF CALIFORNIA

DATED: _____, 2021

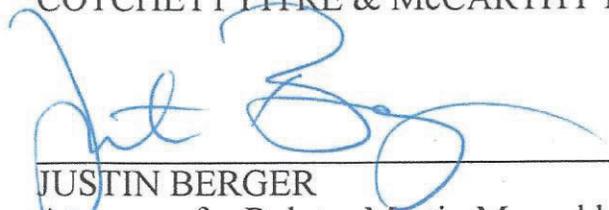
ROB BONTA
Attorney General for the State of California

NICHOLAS PAUL
Senior Assistant Attorney General
California Department of Justice
Division of Medi-Cal Fraud & Elder Abuse

MARTIN MANSUKHANI – RELATOR

DATED: 5/19/21, 2021

COTCHETT PITRE & McCARTHY LLP



JUSTIN BERGER
Attorneys for Relator Martin Mansukhani

DATED: 5/19/21, 2021

PHILLIPS & COHEN LLP



EDWARD H. ARENS
Attorneys for Relator Martin Mansukhani

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

SIVA ARUNASALAM, M.D., an individual

DATED: May 21, 2021

HOLMES, TAYLOR, COHEN & JONES LLP

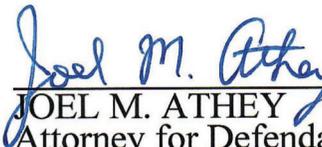


JOEL M. ATHEY
Attorney for Defendants Siva Arunasalam, M.D.,
an individual; and Siva Arunasalam, M.D., a
Professional Medical Corporation

SIVA ARUNASALAM, M.D., a Professional Medical Corporation

DATED: May 21, 2021

HOLMES, TAYLOR, COHEN & JONES LLP



JOEL M. ATHEY
Attorney for Defendants Siva Arunasalam, M.D.,
an individual; and Siva Arunasalam, M.D., a
Professional Medical Corporation

Exhibit 1 -

**Consent Judgment – Dr. Siva
Arunasalam and Siva PC**

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

UNITED STATES OF AMERICA and
STATE OF CALIFORNIA *ex rel.*
MARTIN MANSUKHANI,

Plaintiffs,

v.

PRIME HEALTHCARE SERVICES,
INC.; PRIME HEALTHCARE
FOUNDATION, INC.; PRIME
HEALTHCARE MANAGEMENT,
INC.; DESERT VALLEY HOSPITAL;
HIGH DESERT HEART VASCULAR
INSTITUTE, a California Professional
Medical Corporation; PREM REDDY,
M.D., FACC; HIGH DESERT HEART
INSTITUTE MEDICAL
CORPORATION; A&A SURGERY
CENTER, a Medical Corporation; SIVA
ARUNASALAM, M.D.; and SIVA
ARUNASALAM, M.D., a Professional
Medical Corporation,

Defendants.

No. 5:18-cv-00371-RGK-SHK

CONSENT JUDGMENT

1 *Qui tam* plaintiff Martin Mansukhani (“Relator”); real party in interest the United
2 States of America, acting through the United States Department of Justice and on behalf
3 of the Office of Inspector General (“HHS-OIG”) of the Department of Health and
4 Human Services (“HHS”) (collectively, the “United States”); real party in interest the
5 State of California (“California”); and defendants Siva Arunasalam, M.D., an individual,
6 and Siva Arunasalam, M.D., a Professional Medical Corporation (collectively, “Dr.
7 Siva”), through their respective counsel, have submitted a Stipulation for Entry of
8 Consent Judgment Against Defendants Siva Arunasalam, M.D., an individual, and Siva
9 Arunasalam, M.D., a Professional Medical Corporation (the “Stipulation”).

10 Pursuant to the Stipulation and Federal Rule of Civil Procedure 58, and good
11 cause appearing, IT IS HEREBY ORDERED, ADJUDGED, AND DECREED AS
12 FOLLOWS:

- 13 1. Pursuant to a Settlement Agreement entered into by the United States,
14 California, Relator, and Dr. Siva (the “Parties”) on May __, 2021 (the
15 “Effective Date”), Dr. Siva shall pay to the United States and California a
16 total of \$2,000,000.00 (the “Settlement Amount”), of which \$1,000,000.00
17 is restitution, plus applicable interest as described below. Dr. Siva shall pay
18 the following amounts to the United States and California under the
19 following terms and conditions:
 - 20 a. No later than ten (10) business days after the Effective Date of the
21 Settlement Agreement, Dr. Siva shall pay the United States
22 \$95,000.00;
 - 23 b. No later than ten (10) business days after the Effective Date of the
24 Settlement Agreement, Dr. Siva shall pay California \$5,000.00;
 - 25 c. No later than 180 calendar days after the Effective Date of the
26 Settlement Agreement, Dr. Siva shall pay the United States
27 \$1,805,000 plus accrued interest at a rate of 0.75% simple annual
28 interest from the Effective Date of the Settlement Agreement;

- 1 d. No later than 180 calendar days after the Effective Date of the
2 Settlement Agreement, Dr. Siva shall pay California \$95,000.00 plus
3 accrued interest at a rate of 0.75% simple annual interest from the
4 Effective Date of the Settlement Agreement;
- 5 e. The above defined payments to the United States (the “Federal
6 Settlement Amount”) shall be made by electronic funds transfer
7 pursuant to written instructions provided by the Office of the United
8 States Attorney for the Central District of California;
- 9 f. The above defined payments to California (the “California Settlement
10 Amount”) shall be made by electronic funds transfer pursuant to
11 written instructions provided by the California Attorney General’s
12 Office; and
- 13 g. The above-defined payments may be prepaid, in whole or in part,
14 without penalty.

15 2. As long as Dr. Siva makes the payments in the full amounts, and on or
16 before the specified dates as set forth in Paragraph 1 above, neither the
17 United States nor California shall execute on the Consent Judgment. But if
18 Dr. Siva fails to make any payment as ordered in Paragraph 1, then (a) the
19 full Settlement Amount shall be immediately due and payable, (b) the
20 United States shall have the right to immediately execute on the Consent
21 Judgment for the full remaining unpaid balance of the Federal Settlement
22 Amount, (c) California shall have the right to immediately execute on the
23 Consent Judgment for the full remaining unpaid balance of the California
24 Settlement Amount, and (d) Dr. Siva shall be liable to the United States and
25 California for all costs, fees, and expenses, including but not limited to
26 attorney’s fees, incurred by the United States and California in connection
27 with enforcing this Consent Judgment.
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Respectfully presented, and approved as to form and content by:

THE UNITED STATES OF AMERICA

DATED: __ May 18, 2021

TRACY L. WILKISON
Acting United States Attorney
DAVID M. HARRIS
Assistant United States Attorney
Chief, Civil Division
DAVID K. BARRETT
Assistant United States Attorney
Chief, Civil Fraud Section



ABRAHAM C. MELTZER
Assistant United States Attorney
Deputy Chief, Civil Fraud Section
Attorneys for the United States of America

DATED: _____, 2021

BRIAN M. BOYNTON
Acting Assistant Attorney General, Civil Division
JAMIE ANN YAVELBERG
ROBERT J. McAULIFFE

MARIE V. BONKOWSKI
Senior Trial Counsel
United States Department of Justice
Civil Division/Fraud Section
Attorneys for the United States of America

DATED: _____, 2021

LISA M. RE
Assistant Inspector General for Legal Affairs
Office of Counsel to the Inspector General
Office of Inspector General
United States Department of
Health and Human Services

1
2 Respectfully presented, and approved as to form and content by:

3 THE UNITED STATES OF AMERICA

4
5 DATED: _____, 2021

6 TRACY L. WILKISON
Acting United States Attorney
7 DAVID M. HARRIS
Assistant United States Attorney
Chief, Civil Division
8 DAVID K. BARRETT
Assistant United States Attorney
Chief, Civil Fraud Section

9
10
11 _____
ABRAHAM C. MELTZER
Assistant United States Attorney
12 Deputy Chief, Civil Fraud Section
Attorneys for the United States of America

13
14 DATED: 5/24/, 2021

15 BRIAN M. BOYNTON
Acting Assistant Attorney General, Civil Division
16 JAMIE ANN YAVELBERG
ROBERT J. McAULIFFE

17 *Marie V. Bonkowski*

18 _____
MARIE V. BONKOWSKI
Senior Trial Counsel
19 United States Department of Justice
Civil Division/Fraud Section
20 Attorneys for the United States of America

21 DATED: _____, 2021

22
23
24 _____
LISA M. RE
Assistant Inspector General for Legal Affairs
25 Office of Counsel to the Inspector General
Office of Inspector General
26 United States Department of
Health and Human Services

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Respectfully presented, and approved as to form and content by:

THE UNITED STATES OF AMERICA

DATED: _____, 2021

TRACY L. WILKISON
Acting United States Attorney
DAVID M. HARRIS
Assistant United States Attorney
Chief, Civil Division
DAVID K. BARRETT
Assistant United States Attorney
Chief, Civil Fraud Section

ABRAHAM C. MELTZER
Assistant United States Attorney
Deputy Chief, Civil Fraud Section
Attorneys for the United States of America

DATED: _____, 2021

BRIAN M. BOYNTON
Acting Assistant Attorney General, Civil Division
JAMIE ANN YAVELBERG
ROBERT J. McAULIFFE

MARIE V. BONKOWSKI
Senior Trial Counsel
United States Department of Justice
Civil Division/Fraud Section
Attorneys for the United States of America

DATED: May 26, 2021


LISA M. RE
Assistant Inspector General for Legal Affairs
Office of Counsel to the Inspector General
Office of Inspector General
United States Department of
Health and Human Services

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

THE STATE OF CALIFORNIA

DATED: May 18, 2021

ROB BONTA
Attorney General for the State of California



NICHOLAS PAUL
Senior Assistant Attorney General
California Department of Justice
Division of Medi-Cal Fraud & Elder Abuse

MARTIN MANSUKHANI – RELATOR

DATED: _____, 2021

COTCHETT PITRE & McCARTHY LLP

JUSTIN BERGER
Attorneys for Relator Martin Mansukhani

DATED: _____, 2021

PHILLIPS & COHEN LLP

EDWARD H. ARENS
Attorneys for Relator Martin Mansukhani

SIVA ARUNASALAM, M.D., an individual

DATED: _____, 2021

HOLMES, TAYLOR, COHEN & JONES LLP

JOEL M. ATHEY
Attorney for Defendants Siva Arunasalam, M.D.,
an individual; and Siva Arunasalam, M.D., a
Professional Medical Corporation

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

THE STATE OF CALIFORNIA

DATED: _____, 2021

ROB BONTA
Attorney General for the State of California

NICHOLAS PAUL
Senior Assistant Attorney General
California Department of Justice
Division of Medi-Cal Fraud & Elder Abuse

MARTIN MANSUKHANI – RELATOR

DATED: 5/19/21, 2021

COTCHETT PITRE & McCARTHY LLP



JUSTIN BERGER
Attorneys for Relator Martin Mansukhani

DATED: 5/19/21, 2021

PHILLIPS & COHEN LLP



EDWARD H. ARENS
Attorneys for Relator Martin Mansukhani

SIVA ARUNASALAM, M.D., an individual

DATED: _____, 2021

HOLMES, TAYLOR, COHEN & JONES LLP

JOEL M. ATHEY
Attorney for Defendants Siva Arunasalam, M.D.,
an individual; and Siva Arunasalam, M.D., a
Professional Medical Corporation

1
2 THE STATE OF CALIFORNIA

3
4 DATED: _____, 2021

ROB BONTA
Attorney General for the State of California

5
6
7 _____
NICHOLAS PAUL
Senior Assistant Attorney General
California Department of Justice
Division of Medi-Cal Fraud & Elder Abuse

8
9
10 MARTIN MANSUKHANI – RELATOR

11 DATED: _____, 2021

COTCHETT PITRE & McCARTHY LLP

12
13
14 _____
JUSTIN BERGER
Attorneys for Relator Martin Mansukhani

15
16 DATED: _____, 2021

PHILLIPS & COHEN LLP

17
18
19 _____
EDWARD H. ARENS
Attorneys for Relator Martin Mansukhani

20
21 SIVA ARUNASALAM, M.D., an individual

22 DATED: May 21, 2021

HOLMES, TAYLOR, COHEN & JONES LLP

23
24 
25 _____
JOEL M. ATHEY
Attorney for Defendants Siva Arunasalam, M.D.,
26 an individual; and Siva Arunasalam, M.D., a
27 Professional Medical Corporation
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

SIVA ARUNASALAM, M.D., a Professional Medical Corporation

DATED: May 21, 2021

HOLMES, TAYLOR, COHEN & JONES LLP



JOEL M. ATHEY
Attorney for Defendants Siva Arunasalam, M.D.,
an individual; and Siva Arunasalam, M.D., a
Professional Medical Corporation