Michael A. Hirst (SBN 131034)
Marisela Bernal (SBN 329589)
HIRST LAW GROUP, P.C.
200 B Street, Suite A
Davis, CA 95616
Telephone: (530) 756-7700
Facsimile: (530) 756-7707
michael.hirst@hirstlawgroup.com
marisela.bernal@hirstlawgroup.com

James E. Miller (SBN 262553)
James C. Shah (SBN 260435)
MILLER SHAH LLP
8730 Wilshire Boulevard, Suite 400
Los Angeles, CA 90211
Telephone: (866) 540-5505
Facsimile: (866) 300-7367
jemiller@millershah.com
jcshah@millershah.com

*Attorneys for Plaintiff-Relator*

**IN THE UNITED STATES DISTRICT COURT**

**FOR THE EASTERN DISTRICT OF CALIFORNIA**

| | |
|---|---|
| UNITED STATES of AMERICA, *ex rel.* HEATHER WIDEN,<br><br>Plaintiff,<br><br>v.<br><br>HORNE INTERNATIONAL, INC., *et al.,*<br><br>Defendants. | Civil Action No. 2:22-cv-1893-JAM-AC<br><br>**STIPULATION AND ORDER TO FILE SECOND AMENDED COMPLAINT**<br><br>Judge: Hon. John A. Mendez |



AUTHENTICATED U.S. GOVERNMENT INFORMATION GPO

Plaintiff-Relator, Heather Widen ("Relator"), on behalf of the United States of America ("Government"), and Defendants HORNE LLP ("Horne"), Geoffrey Ross, Lorrie Blevins, and Sandra Gallagher (collectively, "Defendants"), hereby stipulates as follows:

1. Relator filed the complaint initiating this action on October 24, 2022, alleging claims under the False Claims Act, 31 U.S.C. §§ 3729, et seq.

2. On February 23, 2024, Relator filed a First Amended Complaint ("FAC," ECF No. 11) asserting the same claims and adding three named individuals and multiple counties within the State of California as defendants. The FAC also adds claims against the named individual defendants pursuant to the First Amendment of the United States Constitution and 42 U.S.C. § 1983, and adds a negligence claim against Horne International and Horne.

3. On July 22, 2025, the Government filed a Notice of Election to Decline Intervention (ECF No. 25).

4. Shortly thereafter, on July 24, 2025, the Court ordered the case unsealed and directed Relator to serve the FAC and Notice of Decline on Defendants (ECF No. 26). The Court issued a summons as to all defendants named in the FAC on the same day (ECF No. 27).

5. On October 21, 2025, Relator filed a waiver of service on Defendants Horne (ECF No. 31) and affidavits of service on Horne International (ECF No. 32), Lorrie Blevins (ECF No. 33), and Sandra Gallagher (ECF No. 34). Defendant Geoffrey Ross was served on October 22, 2025, and Relator filed his returned executed summons on October 28, 2025 (ECF No. 35).

6. To avoid duplicative responses and favor interests of efficiency, Relator and Defendants agreed that Relator would file a Second Amended Complaint dismissing Horne International and the California county defendants from this action and adding certain factual allegations against Horne LLP by December 11, 2025. The Second Amended Complaint will not add any new allegations and/or claims against Lorrie Blevins, Sandra Gallagher, and/or Geoffrey Ross. The remaining Defendants would thereafter have until February 13, 2026 to file an Answer or otherwise respond, Relator would file her opposition to any motion to dismiss by March 13, 2026 and Defendants would file any reply by April 2, 2026.

7. Accordingly, the parties stipulate, subject to the approval of the Court, that Relator may file a Second Amended Complaint by December 11, 2025.

IT IS SO STIPULATED.

Dated: November 25, 2025

**MILLER SHAH LLP**

/s/ James E. Miller
James E. Miller (SBN 262553)
James C. Shah (SBN 260435)
8730 Wilshire Boulevard, Suite 400
Los Angeles, CA 90211
Telephone: (866) 540-5505
Facsimile: (866) 300-7367
jemiller@millershah.com
jcshah@millershah.com

**HIRST LAW GROUP, P.C.**
Michael A. Hirst (SBN 131034)
Marisela Bernal (SBN 329589)
200 B Street, Suite A
Davis, CA 95616
Telephone: (530) 756-7700
Facsimile: (530) 756-7707
michael.hirst@hirstlawgroup.com
marisela.bernal@hirstlawgroup.com

**THE HIGHMAN LAW FIRM**
Bruce Highman (SBN 101760)
582 Market Street, Suite 1212
San Francisco, CA 94104
Telephone: (415) 982-5564
Facsimilie: (415) 712-0018
bruce.highman@highmanlaw.com

*Attorneys for Relator*

**LATHAM & WATKINS LLP**

/s/ David W. Rowe (as authorized on 11/24/2025)
David W. Rowe (SBN 281658)
355 South Grand Avenue, Suite 400
Los Angeles, CA 90071-1560
Telephone: (213) 485-1560
david.rowe@lw.com

Anne W. Robinson
555 Eleventh Street NW, Suite 1000
Washington, D.C. 20004-1304
Telephone: (202) 637-2161
anne.robinson@lw.com

*Attorneys for Defendant HORNE LLP*

**OFFICE OF THE ATTORNEY GENERAL**

/s/ Paloma Carrero (as authorized on 11/24/2025)
Paloma Carrero, Deputy Attorney General
State Bar No. 295177
1515 Clay Street, 20th Floor
P.O. Box 70550
Oakland, CA 94612-0550
Telephone: (510) 879-0273
Paloma.Carrero@doj.ca.gov

*Attorneys for Defendants Geoffrey Ross, Lorrie Blevins, and Sandra Gallagher*

**ORDER TO FILE SECOND AMENDED COMPLAINT**

Plaintiff-Relator Heather Widen ("Relator"), and Defendants HORNE LLP, Geoffrey Ross, Lorrie Blevins, and Sandra Gallagher (collectively, "Defendants") have stipulated to grant Relator leave to file a second amended complaint.

IT IS HEREBY ORDERED as follows:

1. The stipulation is **GRANTED**.

2. Relator shall have until December 11, 2025, to file a second amended complaint.

3. Defendants shall have until February 13, 2025 to file an answer or Rule 12 motion in response to the second amended complaint.

4. Relator shall have until March 13, 2025 to file her opposition to any Rule 12 motion, and Defendants shall have until April 2, 2026 to file any reply in support of any Rule 12 motion.

IT IS SO ORDERED.

Dated: December 12, 2025

JOHN A. MENDEZ,
SENIOR UNITED STATES DISTRICT JUDGE