

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA
ex rel. MATTHEW DECKER,

Plaintiff,

v.

PENNSYLVANIA STATE UNIVERSITY,

Defendant.

CIVIL ACTION
No. 22-3895

**THE UNITED STATES OF AMERICA'S
NOTICE OF INTERVENTION FOR PURPOSES OF SETTLEMENT**

1. Pursuant to the False Claims Act, 31 U.S.C. § 3730(b)(2) and (4), the United States notifies the Court that it hereby intervenes for settlement purposes against defendant Pennsylvania State University (“Defendant”).

2. The United States and Defendant have reached an agreement (“Settlement Agreement”) to resolve allegations that Defendant violated the False Claims Act, 31 U.S.C. § 3729 *et seq.* In light of this agreement, and for the purpose of effectuating and formalizing that resolution, the United States respectfully advises the Court of its decision to intervene for the purposes of settlement as to certain civil claims for violations of the False Claims Act, as defined by the Covered Conduct in the Settlement Agreement. Relator and Defendant have confirmed through their respective counsel that they agree that the government may intervene for purposes of settlement.

3. Under the terms and conditions of the Settlement Agreement, the parties will promptly file a Joint Stipulation of Dismissal, pursuant to Federal Rule of Civil

Procedure 41(a)(1), after the United States and Relator receive the required payments from Defendant as provided for by the terms of the Settlement Agreement.

Respectfully submitted,

BRIAN M. BOYNTON
Principal Deputy Assistant
Attorney General

JAMIE ANN YAVELBERG
Director

SARA McLEAN
Assistant Director

KIMBERLY FRIDAY
Senior Trial Counsel
Civil Division
Commercial Litigation Branch
United States Department of Justice
P.O. Box 261
Ben Franklin Station
Washington, D.C. 20044
Tel: (202) 451-7655
Kimberly.I.Friday@usdoj.gov

JACQUELINE C. ROMERO
United States Attorney

/s/ Charlene Keller Fullmer for
GREGORY B. DAVID
Assistant United States Attorney
Chief, Civil Division

/s/ Rebecca S. Melley
PETER CARR
REBECCA S. MELLEY
Assistant United States Attorneys
615 Chestnut St. Suite 1250
Philadelphia, PA 19106
Tel.: (215) 861-8622/8328
Peter.Carr@usdoj.gov
Rebecca.Melley@usdoj.gov

Dated: October 23, 2024

CERTIFICATE OF SERVICE

I certify that the above document has been served on all counsel of record via electronic filing and is available for viewing and downloading from the ECF System.

/s/ Rebecca S. Melley
REBECCA S. MELLEY
Assistant United States Attorney

Dated: October 23, 2024