



## Relator Settlements

*State Farm Mut. Auto. Ins. Co. v. Angelo*, 95 F.4th 419 (6th Cir. 2024) – At issue in this case was whether the district court erred when it required the relator to dismiss his False Claims Act ("FCA") claim against the defendant pursuant to a release in a previous settlement agreement. The relator alleged in his qui tam action that the defendant fraudulently refused to pay medical benefits for auto accidents that forced the government to pick up the tab. The defendant moved to dismiss, arguing that the relator had released his claims under a prior settlement agreement with the defendant resolving a RICO suit that required the relator to take "all steps necessary" to release certain claims against the defendant. Agreeing with the defendant, the district court directed the relator to file a proposed motion for voluntary dismissal of his qui tam action. The relator appealed.

[Read the full article on \*Federal Bar Association Qui Tam News\* section here.](#)

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