

CONSTANTINE CANNON LLP

NEW YORK | WASHINGTON | SAN FRANCISCO

Marlene Koury
415-639-4012
mkoury@constantinecannon.com

January 18, 2024

VIA CM/ECF

The Honorable R. Brooke Jackson
U.S. District Court of the District of Colorado
Alfred A. Arraj U.S. Courthouse,
Courtroom A902, 901 19th Street
Denver, CO 80294

RE: *United States ex rel. Fiorisce LLC v. Perdoceo et al.* (No. 1:21-cv-00573)

Dear Judge Jackson,

Following the Court's ruling on Defendants' motion to dismiss (ECF 52), Relator writes to respectfully request leave to file a third amended complaint to add additional factual allegations regarding Perdoceo's direct involvement in the alleged scheme. Relator will be in a position to file the amended complaint by February 7, 2024. Defendant takes no position on Relator's request.

In the meantime, Relator intends to move forward with discovery in the case without delay.

Sincerely,

s/s Marlene Koury

Marlene Koury
CONSTANTINE CANNON LLP
150 California Street, Suite 1600
San Francisco, CA 94111
Tel: (415) 639-4001
Fax: (415) 639-4002
mkoury@constantinecannon.com

cc: All Counsel of Record (via ECF)