

## CLIENT ALERT

### Living in a Material World After *Escobar*

February 2, 2017

On January 26, 2017, the Fourth Circuit heard oral argument in *United States ex rel. Omar Badr v. Triple Canopy*, one of four False Claims Act decisions that the Supreme Court vacated and remanded for further consideration in light of the Court's June 2016 holding regarding the implied certification theory in *Universal Health Servs. v. United States ex rel. Escobar*. Since *Escobar* was decided, three of the four circuits have grappled with the *Escobar* holding and issued decisions in the remanded cases. In a "[Bloomberg Law Insight](#)," C&M attorneys discuss how these early decisions illustrate the flexible nature of the *Escobar* materiality test and are an early sign of much litigation to come.

For more information, please contact the professional(s) listed below, or your regular Crowell & Moring contact.

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