

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**SHAWN JAIN, GLORIA HACKMAN, *et al.*,**

**Plaintiffs,**

**v.**

**AHOLD USA, INC. d/b/a various entities,**

**Defendant.**

**Civil Action No. 1:16-cv-01415-RC**

**RULE 41 NOTICE OF DISMISSAL WITHOUT PREJUDICE  
AND RESERVATION OF RIGHTS**

Pursuant to Rule 41(a) of the Federal Rules of Civil Procedure, Plaintiffs Shawn Jain and Gloria Hackman hereby voluntarily dismisses the above-captioned matter without prejudice.

Should Plaintiffs refile and succeed on their claims, they expressly reserve the right to petition for successful party fees pursuant to D.C. Code § 28-3905(k)(2)(B) for the time spent to-date on the above-captioned matter.

Respectfully submitted,

Dated: July 12, 2016

/s/ Jason S. Rathod

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