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5 Attorneys for Defendant
CHICK-FIL-A, INC.

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7
8 UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10
11 RONALD ORTEGA, on behalf of himself
and all others similarly situated,

12 Plaintiff,

13 v.

14 CHICK-FIL-A, INC., and DOES 1 - 50,
15 inclusive,

16 Defendant.

Case No. 2:21-cv-00839-KJM-CKD

**DEFENDANT CHICK-FIL-A, INC.'S
NOTICE OF VOLUNTARY DISMISSAL OF
NOTICE OF REMOVAL**

State Action Filed: March 11, 2021
State Action Served: April 8, 2021

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1 **PLEASE TAKE NOTICE** that Defendant, Chick-fil-A, Inc., by and through counsel and
2 pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i), hereby voluntarily dismisses its May
3 7, 2021 removal of this action from the Sacramento County Superior Court (Case 34-02021-
4 00296245) *without* prejudice to refile. In support of the instant notice, Defendant states as
5 follows:

6 1. Defendant filed its Notice of Removal [Dkt. 1] on May 7, 2021.

7 2. Federal Rule of Civil Procedure 41(a)(1)(A) provides, in relevant part, that a
8 “plaintiff may dismiss an action without court order by filing . . . a notice of dismissal before the
9 opposing party serves either an answer or a motion for summary judgment.”

10 3. Plaintiff has not served an answer or filed a motion for summary judgment in this
11 action.

12 4. Accordingly, this action may be dismissed *without prejudice* without an Order of
13 the Court.

14
15 Dated: May 13, 2021

TROUTMAN PEPPER HAMILTON
SANDERS LLP

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18 By: /s/ Wynter L Deagle
19 Wynter L Deagle

20 Attorneys for Defendant
21 CHICK-FIL-A, INC.

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CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of May, 2021, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system and a copy has been served on all parties who are registered with the CM/ECF service.

TROUTMAN PEPPER HAMILTON SANDERS LLP

By: /s/ Wynter L Deagle

Wynter L Deagle

Attorneys for Defendant
CHICK-FIL-A, INC.

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