

1 James H. Bartolomei (SBN 301678)
2 james@duncanfirm.com
3 Of Counsel at Duncan Firm, P.A.
4 809 W. 3rd Street
5 Little Rock, Arkansas 72201
6 Telephone: 501.228.7600
7 Facsimile: 501.228.0415

8
9 Attorneys for Plaintiff NADIA LOTUN

10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA
12 SOUTHERN DIVISION

13 NADIA LOTUN, individually, and on behalf
14 of all others similarly situated,

15 Plaintiff,

16 v.

17 ROSETTA STONE, INC.;
18 ROSETTA STONE LTD.;
19 ROSETTA STONE INTERNATIONAL,
20 INC.; and DOES-1-10, inclusive,

21 Defendants.
22
23
24
25
26
27
28

Case No. 8:20-cv-02430

Date of Removal: December 29, 2020

*State Court Action filed in the
California Superior Court,
County of Orange on
September 24, 2020 - Case No.:
30-2020-01161980-CU-AT-CXC*

**NOTICE OF DISMISSAL WITH
PREJUDICE PURSUANT TO
41(a)(1)(A)(i)**

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i), Plaintiff Nadia Lotun hereby dismisses this action with prejudice in its entirety as to her individual claims as to the following Defendants:

- Defendant ROSETTA STONE, INC.;
- Defendant ROSETTA STONE LTD.;
- Defendant ROSETTA STONE INTERNATIONAL, INC.

No Defendant has answered or served a motion for summary judgment. Moreover, there is no certified class in this action, nor a class proposed to be certified for purposes of this dismissal.

Respectfully submitted,

Dated: March 8, 2021

DUNCAN FIRM, P.A.

By: /s/ James H. Bartolomei
James H. Bartolomei

Attorneys for Plaintiff
NADIA LOTUN

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Joint Stipulation of Dismissal With Prejudice was filed with the Clerk of the Court by using the CM/ECF system on this 8th day of March, 2021, which will send notification of the same to all counsel of record.

/s/ James H. Bartolomei

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28