

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION**

ANNET TIVIN, individually and on
behalf of all others similarly situated,

Plaintiff,

0:23-cv-62245-RS

- against -

TARGET CORPORATION,

Defendant

**NOTICE AND [PROPOSED] ORDER OF VOLUNTARY DISMISSAL
WITH PREJUDICE**

Plaintiff Annet Tivin, by and through her undersigned counsel of record, gives notice pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i) that she hereby voluntarily dismisses this action with prejudice.

- (i) Defendants have not filed an answer or a motion for summary judgment in this matter;
- (ii) Plaintiff has not filed a motion for class certification;
- (iii) The individual claims of Plaintiff are dismissed with prejudice;
- (iv) The claims of the putative class are dismissed without prejudice;
- (v) The parties shall bear their own costs, expenses, and fees.

Respectfully submitted this 9th day of July 2024.

/s/William Wright

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PROPOSED ORDER

Based on Plaintiff's Notice of Voluntary Dismissal with Prejudice, IT IS SO ORDERED. The Clerk of the Court is directed to dismiss this matter with prejudice as to Plaintiff Annet Tivin's individual claims, and without prejudice as to the claims of the putative class. All other existing dates and deadlines in this matter are hereby vacated.

DATED: _____

By: _____
Hon. Judge Rodney Smith
United States District Judge

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 9th day of July 2024, the above and foregoing was filed with the Clerk of the Court through the CM/ECF system, which will send electronic notification to all counsel of record.

/s/William Wright

ATTORNEY FOR PLAINTIFF