

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF FLORIDA
TALLAHASSEE DIVISION**

FLORIDIANS PROTECTING
FREEDOM, INC.,

Plaintiff,

v.

JOSEPH A. LADAPO, in his official
capacity as State Surgeon General and
Head of the Florida Department of
Health, and JOHN WILSON, former
General Counsel to the Florida
Department of Health, in his individual
capacity,

Defendants.

Civil Action No. 4:24-cv-00419

**PLAINTIFF'S NOTICE OF VOLUNTARY DISMISSAL OF ALL CLAIMS
AGAINST DEFENDANT JOHN WILSON**

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i), Plaintiff Floridians Protecting Freedom, Inc., hereby voluntarily dismisses all claims brought against Defendant John Wilson in his individual capacity with prejudice. *See Rosell v. VMSB, LLC*, 67 F.4th 1141, 1144 n.2 (11th Cir. 2023) (confirming that, in a multi-

defendant case, Rule 41(a) is an appropriate vehicle to dismiss “all claims against a particular defendant”).

In light of the affidavit of former Florida Department of Health General Counsel John Wilson attached as Exhibit A to this notice, which explains the circumstances in which Mr. Wilson was directed to sign his name on the October 3 letter at issue in this case, Plaintiff has determined that it is unnecessary to pursue individual capacity claims against Defendant Wilson.

Dated: October 21, 2024

Respectfully submitted,

/s/ Christina Ford

Christina Ford, FL Bar No. 1011634

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CERTIFICATE OF SERVICE

I certify that on October 21, 2024, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel who have entered an appearance. Plaintiff's counsel will separately serve a copy of this filing via email on counsel for Defendant Wilson, who has not yet entered an appearance.

Date: October 21, 2024

/s/ Christina Ford
Christina Ford

Counsel for Plaintiff