

1 **AMERICA FIRST LEGAL FOUNDATION**

JENNIFER WRIGHT ESQ., PLC

2 James K. Rogers (No. 027287)
3 *Senior Counsel*
4 611 Pennsylvania Ave., SE #231
5 Washington, D.C. 20003
6 Phone: (202) 964-3721
7 James.Rogers@aflegal.org

Jennifer J. Wright (No. 027145)
4350 E. Indian School Rd
Suite #21-105
Phoenix, Arizona 85018
jen@jenwesq.com

8 *Attorneys for Plaintiffs*

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

9 Strong Communities Foundation of Arizona
10 Incorporated, and Yvonne Cahill;

No. CV-24-02030-PHX-KML

11 Plaintiffs,

12 v.

**THE PLAINTIFFS' NOTICE OF
RULE 41(a)(1)(A) DISMISSAL OF
THE YAVAPAI COUNTY DE-
FENDANTS**

13 Stephen Richer, in his official capacity as
14 Maricopa County Recorder; *et al.*

15 Defendants.
16

17 Pursuant to Fed. R. Civ. P. 41(a)(1)(A), the Plaintiffs dismiss all their claims, with
18 prejudice, against Defendants Yavapai County and Yavapai County Recorder Michelle
19 Burchill (the "Yavapai County Defendants"). Dismissal is appropriate under Rule 41(a)(1)(A)
20 because the Yavapai County Defendants have not yet filed an answer or motion for summary
21 judgment. *See Pedrina v. Chun*, 987 F.2d 608, 610 (9th Cir. 1993) (holding that Rule 41(a)(1)
22 allows "a plaintiff to dismiss fewer than all of the named defendants").
23
24
25
26

1 RESPECTFULLY SUBMITTED this 7th of November, 2024.

2
3 **America First Legal Foundation**

4 By: /s/James Rogers

5 James K. Rogers (No. 027287)

6 *Senior Counsel*

7 America First Legal Foundation

8 611 Pennsylvania Ave., SE #231

9 Washington, D.C. 20003

10 Phone: (202) 964-3721

11 James.Rogers@aflegal.org

12 Jennifer J. Wright (027145)

13 Jennifer Wright Esq., Plc

14 4350 E. Indian School Rd

15 Suite #21-105

16 Phoenix, Arizona 85018

17 jen@jenwesq.com

18 *Attorneys for Plaintiffs*

19 **CERTIFICATE OF SERVICE**

20 I hereby certify that on this 7th day of November, 2024, I electronically filed the foregoing
21 document with the Clerk of the Court for the United States District Court for the District of
22 Arizona using the CM/ECF filing and transmittal of a Notice of Electronic filing to the CM/ECF
23 registrants on record.

24 /s/ James K. Rogers
25 *Attorney for the Plaintiffs*