

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF FLORIDA

**YOUNG AMERICANS FOR FREEDOM  
AT UNIVERSITY OF FLORIDA; SARAH  
LONG; and DANIEL WELDON,**

*Plaintiffs,*

v.

**THE UNIVERSITY OF FLORIDA  
BOARD OF TRUSTEES; THE  
TRUSTEES OF THE UNIVERSITY OF  
FLORIDA**—Morteza Hosseini, Thomas G.  
Kuntz, David L. Brandon, Ian M. Green, James  
W. Heavener, Leonard H. Johnson, Daniel T.  
O’Keefe, Rahul Patel, Marsha D. Powers,  
Jason J. Rosenberg, Robert G. Stern, Katherine  
Vogel Anderson, and Anita G. Zucker—each  
in his or her official and individual capacities;  
**W. KENT FUCHS**, President of University of  
Florida, in his official and individual  
capacities; **DAVID PARROTT**, Vice  
President of Student Affairs of University of  
Florida, in his official and individual  
capacities,

*Defendants.*

Case No.: 1:18-cv-00250-MW-GRJ

**NOTICE OF VOLUNTARY DISMISSAL PURSUANT TO F.R.C.P. 41(a)(1)(A)(i)**

Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(i) and a settlement agreement reached by the parties (attached as “Settlement Agreement” and reproduced in part below), Plaintiffs Young Americans for Liberty at the University of Florida, Sarah Long, and Daniel Weldon hereby give notice that all claims brought in Plaintiffs’ Verified Complaint in the above-captioned case are voluntarily dismissed with prejudice.

## **BACKGROUND**

Plaintiffs filed this action (“the Lawsuit”) on December 21, 2018. In the Lawsuit, Plaintiffs allege that Defendants’ actions and policies violated their rights to free speech, due process and equal protection under the First and Fourteenth Amendments to the United States Constitution by collecting mandatory student fees that were distributed to fund student expression without viewpoint-neutral criteria and by denying Plaintiffs equal access to that funding. The policies that Plaintiffs alleged to be unconstitutional were found in the University of Florida’s Student Government 800 Code (the “800 Code”).

Without admitting wrongdoing, Defendants engaged in good faith efforts to resolve Plaintiffs’ claims without Court involvement, including suspending implementation of the challenged policies and working with Plaintiffs to revise the 800 Code. In June 2019, the Student Government adopted revisions to the 800 Code. The parties subsequently agreed to settle the remaining claims.

## **CONCLUSION**

Therefore, in accordance with and in reliance upon the terms of the settlement agreement Plaintiffs hereby give notice that all claims brought in Plaintiffs’ Verified Complaint in the above-captioned case are voluntarily dismissed with prejudice.

Respectfully submitted this 31<sup>st</sup> of July, 2019,

/s/ J. Caleb Dalton  
J. Caleb Dalton, Esquire  
D.C. Bar No.: 1033291  
cdalton@ADFLegal.org  
Tyson C. Langhofer, Esquire  
Arizona Bar No.: 032589  
tlanghofer@ADFLegal.org  
440 First Street NW, Suite 600  
Washington, D.C. 20001  
Telephone: (202) 393-8690  
Facsimile: (202) 347-3622  
*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on the 31<sup>st</sup> day of July, 2019, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system which will complete service by furnishing a true and correct copy of the foregoing via electronic mail to all counsel of record.

/s/ J. Caleb Dalton  
J. Caleb Dalton