

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

CHARLOTTE CHARLES, *et al.*,

Plaintiffs,

vs.

ANNE SACOOLAS, *et al.*,

Defendants.

Case No.: 1:20-cv-1052

**PLAINTIFFS' NOTICE OF PARTIAL VOLUNTARY DISMISSAL**

Plaintiffs Charlotte Charles, Tim Dunn, Niall Dunn, and the Estate of Harry Dunn give notice that they voluntarily dismiss Counts IV, V, VI, and IX of their Complaint pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i). In opposition to the Defendants' Motion to Dismiss (Dkt. 14), Plaintiffs agreed that the substantive law of England and Wales governed Defendants' liability for all Plaintiffs' claims. *See* Dkt. 16 at 19. Because Plaintiffs pleaded Counts IV, V, VI, and IX under Virginia law, Plaintiffs agreed in their opposition to withdraw these claims. At oral argument on March 3, 2021, the Court requested Plaintiffs to file a notice of dismissal with respect to these claims, and Plaintiffs agreed. *See* Dkt. 27 at 2. Plaintiffs provided a copy of this notice to Defendants and Defendants consented to the filing.

Dated: March 11, 2021

Respectfully submitted,

By: /s/ Steven J. Toll

Steven J. Toll, VSB #15300

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*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on March 11, 2021 I electronically filed the *Plaintiffs' Notice of Partial Voluntary Dismissal* with the Clerk of the Court using the ECF, who in turn sent notice to all counsel of record in this matter.

Dated: March 11, 2021

/s/ Steven J. Toll

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Steven J. Toll