

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

LAURA G. ROSS, *et al.*,

Defendants.

Civil Action No. 25-2261 (RDM)

**UNITED STATES’S RULE 41(a)(1)(A) NOTICE OF VOLUNTARY DISMISSAL OF
CLAIMS AGAINST DEFENANT LAURA G. ROSS**

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i), the United States hereby voluntarily dismisses without prejudice its claims in this action against Defendant Laura G. Ross. The United States will continue to pursue this action against Defendants Thomas E. Rothman and Diane Kaplan.¹

On July 15, 2025, the United States filed this quo warranto action against Defendants Ross, Rothman, and Kaplan, alleging that the three Defendants are and have been unlawfully usurping the office of board member of the Corporation of Public Broadcasting (“CPB”) since President Donald J. Trump lawfully removed them from that office on April 28, 2025. On July 22, 2025,

¹ Although Rule 41’s “text refers to ‘an action,’ most federal courts agree that parties may voluntarily dismiss from a case only certain defendants.” *United States v. All Assets Held at Bank Julius Baer & Co., Ltd.*, 307 F.R.D. 249, 252 (D.D.C. 2014); *see also* Arthur R. Miller, Voluntary Dismissal—In General, 9 Fed. Prac. & Proc. Civ. § 2362 (4th ed.) (“the sounder view and the weight of judicial authority” is that Rule 41 permits dismissal of claims against some, but not all, parties); 8 Moore’s Federal Practice – Civil § 41.21 (2025) (“The majority rule is that a voluntary dismissal may be taken against fewer than all defendants, as long as all claims are dismissed as against each one affected.”). If the Court determines that Rule 41 is not a proper mechanism to dismiss the United States’s claims against Defendant Ross, the United States can proceed with a mechanism deemed appropriate by the Court to accomplish that result.

Defendant Ross sent a letter to CPB Chief Executive Officer Patricia Harrison, stating that “I no longer hold or exercise the position of Director of the Corporation for Public Broadcasting.” That letter, which Defendant Ross’s counsel shared with the government’s counsel, is attached as Exhibit A. On or around July 25, 2025, the CPB changed its website to remove Defendant Ross from the list of current directors (although that list still includes Defendants Kaplan and Rothman, who are unlawfully usurping their positions), and to add Defendant Ross to a list of “Former CPB Board Members.” *See* CPB, Board of Directors, <https://cpb.org/aboutcpb/leadership/board>. The United States accordingly dismisses its claims against Defendant Ross without prejudice.

Respectfully submitted,

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Dated: July 25, 2025

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