

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

YASMEEN ELAGHA

Plaintiff,

v.

Case No: 1:24-cv-12066
Hon. Charles P. Kocoras

NORTHWESTERN UNIVERSITY,
HARI OSOFSKY in her official capacity as Dean of Northwestern University School
of Law,
SUSAN MICHELLE SPIES ROTH, in her official capacity as Dean of students at
Northwestern University School of Law,
GEORGE LANGFORD, in his official capacity as associate Dean at Northwestern
University School of Law,
Defendants.

**PLAINTIFF'S NOTICE VOLUNTARILY DISMISSING WITHOUT PREJUDICE
COUNTS III AND IV ONLY PURSUANT TO FED.R.CIV.P. 41(a)(1).**

NOW COMES, Plaintiff, Yasmeen Elagha, by and through her counsel,
Waleed Naser, Farah Chalisa, Advanta Law, PLC, & The Shiraz Law Firm, PLLC.,
and for her Notice Voluntarily Dismissing Without Prejudice Counts III and IV
ONLY Pursuant to Fed.R.Civ.P. 41(a)(1), states the following:

Pursuant to Fed.R.Civ.P. 41(a)(1)(A)(i), Plaintiff, through counsel, hereby
files this Notice voluntarily dismissing, without prejudice, the state-law claims as
pled in Counts III and IV of the amended complaint. As of the date and time of the
filing of this notice voluntarily dismissing, without prejudice, Counts III and IV of

the amended complaint, Plaintiff has not been served with an answer to Plaintiff's complaint or a motion for summary judgment under Fed.R.Civ.P. 56.

Accordingly, pursuant to Fed.R.Civ.P.41(a)(1)(B), Counts III and IV ONLY of the amended complaint are hereby dismissed "without" prejudice. See *Williams v Clarke*, 82 F.3d 270, 272 (8th Cir. 1996) ("Federal Rule of Civil Procedure 41(a)(1) allows a plaintiff to dismiss an action without order of the court by filing a notice of dismissal at any time before the adverse party serves an answer or a motion for summary judgment. Rule 41(a)(1) voluntary dismissal is without prejudice unless the plaintiff has previously dismissed an action including the same claim in any other court.")

Dated: March 24, 2025

Respectfully submitted,

By: /s/ Waleed Naser
WALEED NASER
155 N. Wacker Dr. Suite 4250
Chicago, IL 60606
Office: 312-248-2501
Direct: 872-265-8490
waleed@naserlegal.com

One of Plaintiff's counsel.

CERTIFICATE OF SERVICE

I, Waleed Naser, certify that the foregoing document(s) was filed and served via the Court's electronic filing system this 24th day of March, 2025, which will automatically send notification of such filing to all attorneys and parties of record registered electronically.

Dated: March 24, 2025

Respectfully submitted,

/s/ Waleed Naser