

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

FALLS CHURCH MEDICAL CENTER, LLC *et al.*,

Plaintiffs,

v.

M. NORMAN OLIVER, *et al.*,

Defendants.

**CASE NO:** 3:18-cv-428-HEH

Honorable Henry E. Hudson

**STIPULATION REGARDING VOLUNTARY DISMISSAL  
WITHOUT PREJUDICE OF PLAINTIFF ALL WOMEN'S RICHMOND, INC.  
d/b/a A CAPITAL WOMEN'S HEALTH CLINIC AND  
DEFENDANT SHANNON L. TAYLOR PURSUANT TO FED. R. CIV. P. 41(a)(1)**

All Parties, by and through their attorneys, stipulate and agree as follows:

WHEREAS, on September 4, 2018, Plaintiffs filed an Amended Complaint challenging Virginia statutes and regulations applying to abortion providers against Defendants, including Commonwealth Attorneys responsible for enforcing the criminal penalties associated with challenged statutes (ECF No. 41);

WHEREAS, on September 26, 2018, the Court entered an order denying in part and granting in part Defendants' Motion to Dismiss the Amended Complaint (ECF Nos. 52, 53);

WHEREAS, on November 28, 2018, the Parties exchanged their first responses to written discovery requests;

WHEREAS, as of the date of this Stipulation, the Parties have not exchanged any further discovery requests or responses or noticed any depositions;

WHEREAS, Plaintiffs have been notified that the administrator of All Women's Richmond d/b/a A Capital Women's ("A Capital Women's") has resigned effective December 18, 2018, leaving after 17 years in this position, and that the assistant administrator is pregnant and due to give birth on April 27, 2019 and does not intend to return to her current role post-pregnancy;

WHEREAS, there will be no remaining full-time personnel at A Capital Women's who are knowledgeable about Plaintiffs' claims, and the remaining Plaintiffs will proceed with identical or substantially similar allegations as to all of the challenged statutes and regulations;

WHEREAS, Commonwealth Attorney Shannon L. Taylor is responsible for enforcing the challenged criminal penalties in Henrico County where A Capital Women's is located;

NOW, THEREFORE, All Parties stipulate and agree that, pursuant to Federal Rule of Civil Procedure 41(a)(1), and in the interest of the Parties and judicial economy and efficiency, Plaintiff A Capital Women's and Defendant Shannon L. Taylor are voluntarily dismissed without prejudice. This Stipulation does not affect the claims of any other Plaintiffs or the status of any Defendants other than Shannon L. Taylor.

**IT IS SO STIPULATED**

Dated: December 5, 2018

Respectfully submitted,

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