

IN THE CIRCUIT COURT
OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA

DOUGLAS BERGER, et al.)	Case No.: 502017CA010338XXXXMB
)	Division:A1
<i>Plaintiffs,</i>)	
)	
v.)	
)	
JOHN DOE, et al.)	
)	
<i>Defendant.</i>)	

PLAINTIFFS' NOTICE OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE

Pursuant to Florida Rule of Civil Procedure 1.420, Plaintiffs Douglas Berger and Meguro Counseling Center (collectively "Plaintiffs") voluntarily dismisses all claims against Defendant John Doe and Nominal/Relief Defendant Reddit Inc. **without prejudice**, each party bearing its own costs and fees.

Plaintiffs' dismissal is submitted after preliminary discovery has raised questions about the proper jurisdiction to litigate the acerbic, irrational, and highly defamatory statements which have been published about him on the Internet. This dismissal does not reflect in any way upon the merits of Plaintiffs' undoubtedly legitimate claims under applicable law, his likelihood of success upon the merits, or the compensable damages for which he will seek recovery upon his re-filing.

Respectfully submitted,

MEYERS, ROMAN, FRIEDBERG &
LEWIS, LPA

/s/ Rick Russell O'Rourke

Rick Russell O'Rourke

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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 16th day of January 2018, a true and correct copy of the foregoing is being electronically filed with the Clerk of the Court using the CM/ECF filing system. I also certify that no counsel of record or pro se parties have entered an appearance in this case.

/s/ Rick Russell O'Rourke

RICK RUSSELL O'ROURKE