

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF ARKANSAS  
CENTRAL DIVISION**

LITTLE ROCK FAMILY PLANNING  
SERVICES, *et al.*,

Plaintiffs,

v.

LARRY JEGLEY, *et al.*,

Defendants.

CIVIL ACTION

Case No. 4:21-cv-00453-KGB

**PLAINTIFFS' MOTION TO DISMISS WITHOUT PREJUDICE PURSUANT TO  
FEDERAL RULE OF PROCEDURE 41(a)(2)**

Plaintiffs Little Rock Family Planning Services (“LRFP”), Planned Parenthood of Arkansas & Eastern Oklahoma (“PPAEO”), and Dr. Janet Cathey, on behalf of themselves and their patients (“Plaintiffs”), move the Court under Federal Rule of Civil Procedure 41(a)(2) for dismissal of this action without prejudice and without costs.

On June 24, 2022, the Supreme Court issued its opinion in *Dobbs v. Jackson Women’s Health Org.*, No. 19-1392, 2022 WL 2276808 (U.S. June 24, 2022) (“*JWHO*”), overturning *Roe v. Wade*, 410 U.S. 113 (1973), and finding no constitutional right to abortion. This decision constitutes a substantial sea change in federal constitutional law requiring Plaintiffs to reevaluate their claims. As detailed more fully in the accompanying Memorandum of Law, Plaintiffs present a proper explanation for their desire to dismiss the Verified Complaint without prejudice. Given that this case remains in early stages of litigation, with no discovery or pending dispositive motions, such dismissal would not result in a waste of this Court’s judicial time and effort nor in any prejudice the defendants.

Accordingly, and for the reasons set forth in the accompanying Memorandum of Law,

Plaintiffs' respectfully request that this Court enter an order dismissing this action without prejudice and without costs.

Dated: July 6, 2022

Respectfully submitted,

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*\* Motion for admission pro hac vice granted*

/s/ Meagan Burrows  
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*On Behalf of the Arkansas Civil Liberties Union Foundation, Inc.*

*Attorneys for Plaintiffs LRFP, PPAEO & Janet Cathey, M.D.*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on July 6, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which shall send notification of such filing to all parties who have entered an appearance.

/s/ Meagan Burrows  
Meagan Burrows