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### HARVEY RUVIN, CLERK OF COURT, MIA-DADE CTY

## IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT IN AND FOR MIAMI-DADE COUNTY, FLORIDA

| AVRA JAIN,                                                                                          | Case Number: 2017-026857-CA-43 |
|-----------------------------------------------------------------------------------------------------|--------------------------------|
| Plaintiff,                                                                                          |                                |
| vs.                                                                                                 |                                |
| BUCHANAN INGERSOLL & ROONEY PC, a foreign profit corporation, and RICHARD A. MORGAN, an individual, |                                |
| Defendants.                                                                                         |                                |
|                                                                                                     |                                |
| BUCHANAN INGERSOLL & ROONEY PC, a foreign corporation,                                              |                                |
| Counterplaintiff,                                                                                   |                                |
| VS.                                                                                                 |                                |
| AVRA JAIN, an individual.                                                                           |                                |
| Counterdefendant.                                                                                   |                                |
|                                                                                                     |                                |

# COUNTERPLAINTIFF BUCHANAN INGERSOLL'S NOTICE OF DISMISSING COUNTS 2 AND 3 OF ITS COUNTERCLAIM WITHOUT PREJUDICE

Counterplaintiff Buchanan Ingersoll & Rooney PC hereby gives notice that, pursuant to Florida Rule of Civil Procedure 1.420(a)(1), it is voluntarily dismissing Counts 2 and 3 of its Counterclaim, dated March 22, 2019, against Counterdefendant Avra Jain without prejudice. Counterplaintiff expressly reserves the right to refile or reinstate these claims if, and only if, any of the trial court's rulings in the above-captioned case are reversed by an appellate court.

Date: May 22, 2020 Respectfully submitted,

By: s/ James N. Robinson
James N. Robinson

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**Counsel for Defendants** 

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that the foregoing was filed and served on the following parties via Florida's e-filing portal on May 22, 2020:

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#### **Co-counsel for Counterdefendant**

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