

**RANDAZZA** | LEGAL GROUP

Marc J. Randazza, CA Bar No. 269535  
Alex J. Shepard, CA Bar No. 295058  
RANDAZZA LEGAL GROUP, PLLC  
2764 Lake Sahara Drive, Suite 109  
Las Vegas, Nevada 89117  
Telephone: 702-420-2001  
ecf@randazza.com

Attorneys for Plaintiff,  
Free Speech Systems, LLC

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

FREE SPEECH SYSTEMS, LLC,  
a Texas limited liability company

Plaintiff,

vs.

PAYPAL, INC.,  
a Delaware corporation,

Defendant.

Case No. 5:18-cv-06013-LHK

**NOTICE OF VOLUNTARY DISMISSAL  
WITHOUT PREJUDICE**

1 Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(i), Plaintiff Free Speech Systems, LLC  
2 ("FSS") hereby dismisses all claims asserted against Defendant PayPal, Inc.  
3 ("PayPal") **without prejudice**. PayPal has not yet filed an answer or motion for  
4 summary judgment. As discussed in FSS's Motion for a Temporary Restraining  
5 Order (Doc. No. 3), PayPal's User Agreement contains an arbitration clause that  
6 may apply to this dispute. Rather than burden the parties and the Court with  
7 motion practice regarding the enforceability of the arbitration provision, FSS plans  
8 to proceed with its dispute through arbitration under the terms of the User  
9 Agreement.

10  
11 Dated: November 5, 2018.

Respectfully Submitted,

RANDAZZA LEGAL GROUP, PLLC

/s/ Marc J. Randazza

Marc J. Randazza, CA Bar No. 269535

Alex J. Shepard, CA Bar No. 295058

2764 Lake Sahara Drive, Suite 109

Las Vegas, Nevada 89117

Attorneys for Plaintiff,

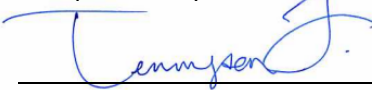
Free Speech Systems, LLC

Case No. 5:18-cv-06013-LHK

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on November 5, 2018, I electronically filed the foregoing document with the Clerk of Court via CM/ECF the court's electronic filing system. I further certify that a true and correct copy of the foregoing document is being served via transmission of Notice of Electronic Filing generated by CM/ECF.

Respectfully submitted,



\_\_\_\_\_  
Employee,  
Randazza Legal Group, PLLC

**RANDAZZA** | LEGAL GROUP

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27