

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF FLORIDA  
TALLAHASSEE DIVISION**

FLORIDIANS PROTECTING  
FREEDOM, INC.,

*Plaintiff,*

v.

JOSEPH A. LADAPO, in his official  
capacity as State Surgeon General and  
Head of the Florida Department of  
Health, and JOHN WILSON, former  
General Counsel to the Florida  
Department of Health, in his individual  
capacity,

*Defendants.*

Civil Action No. 4:24-cv-00419

**PLAINTIFF'S NOTICE OF VOLUNTARY DISMISSAL OF ALL CLAIMS  
AGAINST DEFENDANT JOHN WILSON**

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i), Plaintiff Floridians Protecting Freedom, Inc., hereby voluntarily dismisses all claims brought against Defendant John Wilson in his individual capacity with prejudice. *See Rosell v. VMSB, LLC*, 67 F.4th 1141, 1144 n.2 (11th Cir. 2023) (confirming that, in a multi-

defendant case, Rule 41(a) is an appropriate vehicle to dismiss “all claims against *a particular defendant*”).

In light of the affidavit of former Florida Department of Health General Counsel John Wilson attached as Exhibit A to this notice, which explains the circumstances in which Mr. Wilson was directed to sign his name on the October 3 letter at issue in this case, Plaintiff has determined that it is unnecessary to pursue individual capacity claims against Defendant Wilson.

Dated: October 21, 2024

Respectfully submitted,

/s/ Christina Ford

Christina Ford, FL Bar No. 1011634

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### **CERTIFICATE OF SERVICE**

I certify that on October 21, 2024, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel who have entered an appearance. Plaintiff's counsel will separately serve a copy of this filing via email on counsel for Defendant Wilson, who has not yet entered an appearance.

Date: October 21, 2024

/s/ Christina Ford  
Christina Ford

*Counsel for Plaintiff*

# **Exhibit A**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF FLORIDA  
TALLAHASSEE DIVISION

FLORIDIANS PROTECTING  
FREEDOM, INC.,

Plaintiff,

CASE NO.: 4:24-CV-00419-MW-MAF

v.

JOSEPH A. LADAPO, in his official  
capacity as State Surgeon General and  
Head of the Florida Department of  
Health, and JOHN WILSON, former  
General Counsel to the Florida  
Department of Health, in his individual  
capacity,

Defendants,

/

**AFFIDAVIT OF DEFENDANT JOHN WILSON**

STATE OF FLORIDA  
COUNTY OF LEON

The undersigned, John Wilson, hereby deposes and says:

1. I am over the age of 18. I am of sound mind and am fully competent to make this Affidavit. I have personal knowledge of the facts stated herein and they are true and correct.
2. I am an attorney licensed by the Florida Bar.
3. I served as the General Counsel for the Florida Department of Health from March 2022 until October 10, 2024.



4. On October 3, 2024, in my official capacity as General Counsel, I sent the letters referenced in paragraph 4 of Plaintiff's complaint.

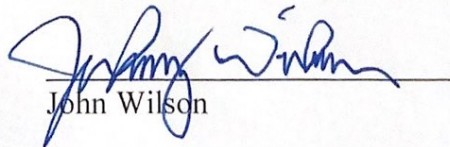
5. I received drafts of the letters directly from Sam Elliot, Assistant General Counsel for the Executive Office of the Governor, earlier that day.

6. I did not draft the letters or participate in any discussions about the letters prior to October 3, 2024.

7. Ryan Newman, General Counsel for the Executive Office of the Governor, and Jed Doty, Deputy General Counsel for the Executive Office of the Governor, directed me to send them under my name and on the behalf of the Florida Department of Health.

8. On October 10, 2024, I resigned from my position as General Counsel in lieu of complying with directives from Newman and Doty to send out further correspondence to the media outlets, similar to the October 3, 2024 letters.

9. On October 10, 2024, prior to my resignation, I was directed by Mr. Newman to execute contracts for outside counsel to be retained by the Department to assist with enforcement proceedings pursuant to the October 3, 2024 letters.

  
John Wilson

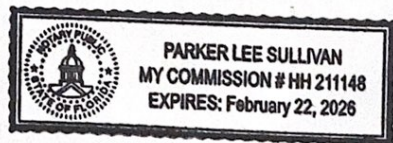


State of Florida  
County of Leon

The foregoing affidavit was acknowledged before me by John Wilson, who has produced FL Driver's License as identification or \_\_\_\_\_ is personally known to me and who did/did not take an oath.

SWORN TO AND SUBSCRIBED before me this 17<sup>th</sup> day of October, 2024.

SEAL



A handwritten signature in blue ink, appearing to read "Parker L. Sullivan".

Signature of Notary Public

Parker L. Sullivan

Name of Notary (Printed)