

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

WILLIAM FRENCH, ET. AL. : No. 3:23-cv-00538-MEM  
: :  
: :  
: :  
Plaintiffs, : :  
: :  
v. : :  
: :  
COUNTY OF LUZERNE, ET. : :  
AL. : :  
: :  
Defendants. :  

---

**NOTICE OF DISMISSAL AND  
REQUEST TO RETAIN JURISDICTION**

Plaintiffs, William French and Melynda Anne Reese, and Defendants, County of Luzerne and the Luzerne County Board of Elections and Registration (collectively, the “Parties”) hereby give notice that the Parties have approved and signed the settlement agreement attached at Exhibit “A.”

Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), the Parties stipulate and agree that the matter is dismissed with prejudice.

As part of the settlement agreement, the Parties have agreed that this Court should retain jurisdiction to enforce the terms of the settlement agreement, if necessary. Accordingly, the Parties respectfully request that the Court retain

jurisdiction to enforce the settlement agreement. *See Kokkonen v. Guardian Life Ins. Co. of America*, 511 U.S. 375, 381-382 (1994).

Respectfully submitted,

Dated: October 15, 2024

/s/ Walter S. Zimolong III  
WALTER S. ZIMOLONG III, ESQ.  
[wally@zimolonglaw.com](mailto:wally@zimolonglaw.com)  
JAMES J. FITZPATRICK III, ESQ.  
[james@zimolonglaw.com](mailto:james@zimolonglaw.com)  
Zimolong, LLC  
P.O. Box 552  
Villanova, PA 19085-0552  
Tele: 215-665-0842  
*Attorneys for plaintiffs*

/s/ Drew P. McLaughlin  
Drew P. McLaughlin  
Kristyn G. Jeckell  
Keighlyn J. Oliver  
ELLIOTT GREENLEAF & DEAN  
[DPM@elliottgreenleaf.com](mailto:DPM@elliottgreenleaf.com)  
15 Public Square, Suite 210  
Wilkes-Barre, PA 18701  
570-371-5290  
*Attorneys for defendants*

RETRIEVED FROM PACER DOCUMENT 75