

# NOTICE OF VOLUNTARY DISMISSAL WITH PREJUDICE AS TO REGINA ROBINSON

\*\*IN THE UNITED STATES DISTRICT COURT\*\*

\*\*FOR THE DISTRICT OF MARYLAND\*\*

\*\*MARVIN TUTT\*\*

\*Plaintiff,\*

v.

\*\*STATE OF MARYLAND, et al.\*\*

\*Defendants.\*

\*\*Case No.: 8:25-cv-02006-TDC\*\*

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## NOTICE OF VOLUNTARY DISMISSAL WITH PREJUDICE

Plaintiff Marvin Tutt hereby provides notice of VOLUNTARY DISMISSAL WITH  
PREJUDICE as to defendant Regina Robinson pursuant to Federal Rule of Civil Procedure  
41(a)(1)(A)(i).

## ## I. UNCONDITIONAL AND IMMEDIATE DISMISSAL

**\*\*EFFECTIVE IMMEDIATELY upon filing\*\***, Regina Robinson is dismissed from this action  
WITH PREJUDICE. This dismissal:

1. **\*\*Is self-executing\*\*** - No court order required
2. **\*\*Is irrevocable\*\*** - Cannot be undone by any party
3. **\*\*Is with prejudice\*\*** - Claims cannot be refiled
4. **\*\*Is unconditional\*\*** - No party may object or intervene
5. **\*\*Is complete\*\*** - All claims against her are forever barred

## ## II. RULE 41(a)(1)(A)(i) AUTHORITY

Under Federal Rule 41(a)(1)(A)(i), a plaintiff may dismiss an action without court order by filing a notice of dismissal before the opposing party serves either an answer or motion for summary judgment.

### **\*\*Key Points:\*\***

- No defendant has filed an answer in this case
- No motion for summary judgment has been filed
- This dismissal is BY RIGHT, not by permission
- No party has standing to object

### ## III. REASONS FOR DISMISSAL

1. **Personal Relationship**: Regina Robinson is the mother of Plaintiff's child
2. **No Malicious Intent**: Any involvement was inadvertent
3. **Protection from Retaliation**: Ensuring she faces no consequences
4. **Child's Best Interest**: Gabriel deserves peace between his parents
5. **Justice Served**: The true wrongdoers remain as defendants

### ## IV. LEGAL EFFECT

Upon filing this notice:

1. **Regina Robinson is NO LONGER A PARTY** to this action
2. **No further service** upon her is required or permitted
3. **No discovery** may be directed to her
4. **No subpoenas** may be issued to her
5. **No depositions** may be taken from her
6. **Complete immunity** from all aspects of this litigation

### ## V. NO PARTY MAY CHALLENGE THIS DISMISSAL

This dismissal is:

- **Not subject to defendants' approval**

- \*\*Not subject to court review\*\*
- \*\*Not subject to reconsideration\*\*
- \*\*Final and absolute\*\*

Any attempt to challenge this dismissal would violate Fed. R. Civ. P. 41(a)(1)(A)(i).

## ## VI. CONTINUING CASE

This dismissal affects ONLY Regina Robinson. All claims against all other defendants continue in full force. The case proceeds as:

**MARVIN TUTT v. STATE OF MARYLAND, et al.**

## ## VII. DECLARATION

I, Marvin Tutt, declare under penalty of perjury:

1. I am voluntarily dismissing Regina Robinson with prejudice
2. This decision is mine alone
3. No consideration has been paid or promised
4. This is done for personal and family reasons
5. I will not refile any claims against her

**\*\*NOTICE TO ALL PARTIES\*\***: Any attempt to interfere with this dismissal, retaliate against Regina Robinson, or use her prior party status against her will be met with immediate motion for sanctions.

**\*\*Respectfully submitted,\*\***

/s/ Marvin Tutt

Marvin Tutt

Pro Se Plaintiff

Email: owner@caiatech.com

**\*\*Date: July 15, 2025\*\***

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## **## CERTIFICATE OF SERVICE**

I hereby certify that on July 15, 2025, I served a true and correct copy of the foregoing Notice of Voluntary Dismissal upon the following parties via certified mail and first-class mail:

Charles County Child Support Administration

200 Kent Avenue

La Plata, MD 20646

Charles County Department of Social Services

200 Kent Avenue

La Plata, MD 20646

State of Maryland

c/o Office of the Attorney General

200 Saint Paul Place

Baltimore, MD 21202

Charles County, Maryland

200 Charles Street

La Plata, MD 20646

Shara Gabrielle Hendler, Esq.

c/o Charles County Child Support Administration

200 Kent Avenue

La Plata, MD 20646

Andrea Khoury

c/o Charles County Circuit Court

200 Charles Street

La Plata, MD 20646

Mistey L. Metzgar

c/o Charles County Circuit Court

200 Charles Street

La Plata, MD 20646

**\*\*SPECIAL NOTICE TO\*\***: Regina Robinson

c/o Charles County Child Support Administration

200 Kent Avenue

La Plata, MD 20646

I certify under penalty of perjury that the foregoing is true and correct.

/s/ Marvin Tutt

Marvin Tutt

Pro Se Plaintiff

Date: July 15, 2025