

No. 24-688

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**In the Supreme Court of the United States**

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PROPERTY MATTERS USA, LLC,  
*Petitioner,*

v.

AFFORDABLE AERIAL PHOTOGRAPHY, INC.,  
*Respondent.*

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*On Petition for a Writ of Certiorari  
to the United States Court of Appeals  
for the Eleventh Circuit*

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**SUPPLEMENTAL BRIEF FOR PETITIONER**

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**PARTIES TO THE PROCEEDING AND  
CORPORATE DISCLOSURE STATEMENT**

Petitioner's Statement pursuant to Rule 29.6 was set forth on page ii of the petition for a writ of certiorari, and there are no amendments to that Statement.

On February 4, 2025, a petition for a writ of certiorari was docketed in the matter styled *WC Realty Group, Inc., d/b/a Century 21 WC Realty v. Affordable Aerial Photography, Inc.*, No. 24-825 (the “*WC Realty* petition”). The *WC Realty* petition is from the Eleventh Circuit’s decision in the case *Affordable Aerial Photography, Inc. v. Reyes*, No. 23-12051, 2024 WL 4024619 (CA11 Sep. 3, 2024), which was discussed by Petitioner as having applied the rule created below, to a Rule 41(a)(1) dismissal “with prejudice,” confirming the categorical nature of the Eleventh Circuit’s rule. Pet. 4, 12, 21-22.

The first question presented in the *WC Realty* petition is the same question presented in this matter. See No. 24-825, pet. i. The *WC Realty* petition presents a second question addressing whether a plaintiff’s voluntary dismissal of its infringement claims should be weighed in favor of granting a defendant’s fee motion in the 17 U.S.C. §505 equitable analysis, or against it, in light of this Court’s precedents and the Copyright Act’s goals of encouraging defendants to present meritorious defenses and discouraging the filing of baseless infringement claims. See No. 24-825, pet. i.

## CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,

/s/

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