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Attorney for Plaintiff Rayfield Spires

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LOS ANGELES SUPERIOR COURT

**SEP 03 2021**

**S. DREW**

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**IN AND FOR THE COUNTY OF LOS ANGELES**

RAYFIELD SPIRES, an individual, on  
behalf of himself and on behalf of all  
persons similarly situated,

Plaintiff,

v.

PANORAMA MEADOWS NURSING  
CENTER, LP, a Limited Partnership; and  
DOES 1-50, Inclusive,

Defendant(s).

Case No. 21STCV19567

**REQUEST FOR AND [PROPOSED]  
ORDER DISMISSING CLASS  
CLAIMS AND INDIVIDUAL CLAIMS  
ONLY FROM OPERATIVE  
COMPLAINT WITHOUT PREJUDICE  
PURSUANT TO CRC, Rule 3.770.**

Judge: Hon. Yvette M. Palazuelos  
Dept: 09

Date Action Filed: May 24, 2021

Plaintiff Rayfield Spires, hereby respectfully requests, by and through his counsel  
of record, that the putative class allegations and all individual claims in the operative



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**CONFORMED COPY  
ORIGINAL FILED**  
Superior Court of California  
County of Los Angeles

**SEP 03 2021**

Shari R. Carter, Executive Officer/Clerk of Court

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**IN AND FOR THE COUNTY OF LOS ANGELES**

RAYFIELD SPIRES, an individual, on  
behalf of himself and on behalf of all  
persons similarly situated,

Plaintiff,

v.

PANORAMA MEADOWS NURSING  
CENTER, LP, a Limited Partnership; and  
DOES 1-50, Inclusive,

Defendant(s).

Case No. 21STCV19567

**DECLARATION OF NICOLE BARVIE  
IN SUPPORT OF DISMISSAL OF  
CLASS CLAIMS AND INDIVIDUAL  
CLAIMS ONLY FROM OPERATIVE  
COMPLAINT WITHOUT PREJUDICE  
PURSUANT TO CRC, RULE 3.770.**

[Filed Concurrently with Plaintiff's First  
Amended Complaint and Request for and  
[Proposed] Order Dismissing Class and  
Individual Claims ONLY without prejudice  
from the Operative Complaint pursuant to  
CRC, Rule 3.770]

Judge: Hon. Yvette M. Palazuelos  
Dept: 09

Date Action Filed: May 24, 2021



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Superior Court of California  
County of Los Angeles

**SEP 03 2021**

5 Attorney for PLAINTIFF

Shari R. Carter, Executive Officer/Clerk of Court

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7  
8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **COUNTY OF LOS ANGELES**

10  
11 RAYFIELD SPIRES, an individual, on behalf  
12 of himself and on behalf of all persons similarly  
situated,

13 Plaintiff,

14 v.

15 PANORAMA MEADOWS NURSING  
16 CENTER, LP, a Limited Partnership; and  
DOES 1-50, Inclusive,

17 Defendant(s).

Case No. 21STCV19567

**PROOF OF SERVICE**

Judge: Hon. Yvette M. Palazuelos  
Dept: 09

Complaint Filed: May 28, 2021  
Trial Date: None Set



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LOS ANGELES SUPERIOR COURT

**SEP 03 2021**

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**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**IN AND FOR THE COUNTY OF LOS ANGELES**

RAYFIELD SPIRES, an individual, on  
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PANORAMA MEADOWS NURSING  
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DOES 1-50, Inclusive,

Defendant(s).

Case No. 21STCV19567

**FIRST AMENDED  
REPRESENTATIVE ACTION  
COMPLAINT FOR:**

- 1) Civil Penalties Pursuant to Labor Code §2699, *et seq.*, for violations of Labor Code §§ 201, 202, 203, 204, 226(a), 226.3, 226.7, 510, 512, 558, 1194, 1197, 1197.1, 1198, 2802, and the California Code of Regulations

Judge: Hon. Yvette M. Palazuelos  
Dept: 09

Date Action Filed: May 24, 2021

**DEMAND FOR JURY TRIAL**