

Envelope: 7784324

ADVOCATES FOR WORKER RIGHTS LLP

MARCO A. PALAU (Bar No. 242340)

marco@advocatesforworkers.com

JOSEPH D. SUTTON (Bar No. 269951)

jds@advocatesforworkers.com

ERIC S. TRABUCCO (Bar No. 295473)

est@advocatesforworkers.com

212 9th Street, Suite 314

Oakland, California 94607

Telephone: (510) 269-4200

Facsimile: (408) 657-4684

JUSTICE AT WORK LAW GROUP, LLP

TOMAS E. MARGAIN (Bar No. 193555)

vchavez@centrolegal.org

HUY TRAN (Bar No. 288196)

smedina@centrolegal.org

1550 The Alameda, Suite 302

San Jose, California 95126

Telephone: (408) 317-1100

Facsimile: (408) 351-0105

Attorneys for Plaintiff and the State of California

CALIFORNIA SUPERIOR COURT

IN AND FOR THE COUNTY OF SANTA CLARA

WILFREDO TALO, an individual, on behalf of
himself, others similarly-situated, the State of
California and other current and former
employees,

Plaintiffs.

vs.

SECURITAS SECURITY SERVICES USA,
INC., a Delaware corporation; and DOES 1-20,
inclusive,

Defendants.

Case No. 20CV366911

**~~PROPOSED~~ ORDER GRANTING
DISMISSAL OF INDIVIDUAL AND
REPRESENTATIVE CLAIMS WITH
PREJUDICE**

Before the Honorable Patricia Lucas

1 **[PROPOSED] ORDER**

2 On November 30, 2021, Plaintiff Willie Talo filed a Request for Dismissal of Class Claims
3 Without Prejudice pursuant to California Rules of Court (“CRC”), Rule 3.770. As part of that request,
4 Counsel for Plaintiff submitted a declaration pursuant to CRC, Rule 3.770(a), setting forth the facts on
5 which Plaintiff relied in making his request to dismiss his class claims. On December 1, 2021,
6 Plaintiff’s request was granted, with additional instructions to submit an additional proposed order
7 approving dismissal of his individual claims and representative Private Attorney General Act (“PAGA”)
8 claim with prejudice.

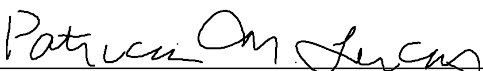
9 Having read and considered Plaintiff Willie Talo’s Request for Dismissal of Class Claims
10 Without Prejudice, the Declaration of Eric S. Trabucco filed in support of the request, the Court’s
11 December 1, 2021 Order Granting Dismissal of Class Claims Without Prejudice, and good cause
12 appearing, the Court hereby **DISMISSES** Plaintiff’s first (1st) through eighth (8th) individual claims
13 under the California Labor Code, and Plaintiff’s ninth (9th) individual claim under the California
14 Business & Professions Code, with prejudice.

15 Additionally, having read and considered Plaintiff’s Request for Dismissal of Class Claims
16 Without Prejudice, including the Declaration of Eric S. Trabucco filed in support of the request
17 explaining that Plaintiff has reached an agreement with Defendant to settle only his individual claims,
18 having been satisfied that there is no settlement of a representative claim in this action that would require
19 court approval pursuant to Labor Code section 2699.3(b)(4), and good cause appearing, the Court
20 hereby **DISMISSES** Plaintiff’s tenth (10th) representative PAGA claim under California Labor Code
21 sections 2698, *et seq.*, with prejudice.

22 Accordingly, this action is hereby **DISMISSED** in its entirety with prejudice.

23 **IT IS SO ORDERED**

24 Dated: December 3, 2021

25 
26 The Honorable Patricia Lucas
27 Santa Clara County Superior Court Judge
28