



BIBIYAN LAW GROUP, P.C.

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June 14, 2021

PAGA NOTICE OF COURT ORDER FILED ELECTRONICALLY

Department of Industrial Relations
Accounting Unit
455 Golden Gate Avenue, 10th Floor
San Francisco, California 94102
<https://dir.tfaforms.net/311>

Re: Notice Letter Court Order re: PAGA Action of Agustin Pedroza Labra on
Behalf of Himself and Aggrieved Employees Under California Labor
section 2699.3

Employer: Ross Dress for Less, Inc.
5130 Hacienda Drive
Dublin, California 94568

Ross Stores, Inc.
5130 Hacienda Drive
Dublin, California 94568

Michael Kobayashi
5130 Hacienda Drive
Dublin, California 94568

To Whom It May Concern:

Pursuant to the Court's June 9, 2021 Order related to an individual-claims-only settlement in the Alameda County Superior Court matter titled *Augstin Pedroza Labra v Ross Dress For Less, Inc., et al.*, Case No. RG20065903, Augstin Pedroza Labra provides the following Notice of Court Order:

"Having reviewed plaintiff AUGUSTIN PEDROZA LABRA's ("Plaintiff") Request for Dismissal Without Prejudice of Representative Allegations Under the Private Attorney's General Act, Labor Code Sec. 2699, Et Seq. against defendants ROSS DRESS FOR LESS, INC., and any of its respective subsidiaries or affiliated companies within the State of California ("RDL"), ROSS STORES, INC., and any of its respective subsidiaries or affiliated companies within the State of California ("RSI"), and MICHAEL KOBAYASHI (collectively "Defendants"), and the facts set forth in the Declaration of Jeffrey D. Klein, and good cause appearing therefore, IT IS HEREBY ORDERED:

California Labor and Workforce Development Agency

June 14, 2021

Page 2

“1. Plaintiff’s representative allegations under the Private Attorneys General Act of 2004, brought in Alameda County Superior Court Case No. RG20065903 against Defendants (“PAGA Allegations”), are dismissed without prejudice.

“2. The Order and the dismissal of Plaintiff’s PAGA Allegations shall have no res judicata or collateral estoppel effect on any employees of Defendants.

“3. Each Party shall bear his/its own attorneys’ fees and costs, and no party is the prevailing party for any purpose in connection with these dismissals.

“4. Plaintiff shall give notice of this dismissal to LWDA within 5 days of this order.”

The order was signed by The Honorable Brad Seligman on June 9, 2021.

Very truly yours,

BIBIYAN LAW GROUP, P.C.

/s/Jeffrey D. Klein

Jeffrey D. Klein

cc: Ross Dress for Less, Inc. (via U.S. Certified Mail, Return Receipt Requested)
Ross Stores, Inc. (via U.S. Certified Mail, Return Receipt Requested)
Michael Kobayashi (via U.S. Certified Mail, Return Receipt Requested)

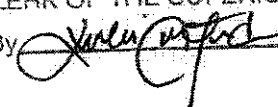


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FILED
ALAMEDA COUNTY

JUN 09 2021

CLERK OF THE SUPERIOR COURT

By  Deputy

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Attorneys for Plaintiff, AUGUSTIN PEDROZA LABRA, an individual
and on behalf of himself and all others aggrieved

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ALAMEDA**

AGUSTIN PEDROZA LABRA, on behalf of
himself and all others similarly situated,

Plaintiff,

v.

ROSS DRESS FOR LESS, INC., a Virginia
corporation; ROSS STORES, INC., a
Delaware corporation; MICHAEL
KOBAYASHI, an individual; and DOES 1
through 100, inclusive,
Defendants.

~~CASE NO.: RG20061418~~
CASE NO.: RG20065903

[Assigned for all purposes to the Hon. Brad
Seligman, in Dept. 23]

**[PROPOSED] ORDER DISMISSING
REPRESENTATIVE ALLEGATIONS
UNDER THE PRIVATE ATTORNEYS
GENERAL ACT, LABOR CODE SEC.
2699, ET SEQ. WITHOUT PREJUDICE**

Complaint Filed: May 11, 2020
Trial Date: Not Assigned

Having reviewed plaintiff AUGUSTIN PEDROZA LABRA's ("Plaintiff") Request for
Dismissal Without Prejudice of Representative Allegations Under the Private Attorney's General
Act, Labor Code Sec. 2699, Et Seq. against defendants ROSS DRESS FOR LESS, INC., and any

1 of its respective subsidiaries or affiliated companies within the State of California ("RDL"), ROSS
2 STORES, INC., and any of its respective subsidiaries or affiliated companies within the State of
3 California ("RSI"), and MICHAEL KOBAYASHI (collectively "Defendants"), and the facts set
4 forth in the Declaration of Jeffrey D. Klein, and good cause appearing therefore, IT IS HEREBY
5 ORDERED:

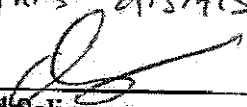
6 1. Plaintiff's representative allegations under the Private Attorneys General Act of
7 2004, brought in Alameda County Superior Court Case No. RG20065903 against Defendants
8 ("PAGA Allegations"), are dismissed without prejudice.

9 2. The Order and the dismissal of Plaintiff's PAGA Allegations shall have no res
10 judicata or collateral estoppel effect on any employees of Defendants.

11 3. Each Party shall bear his/its own attorneys' fees and costs, and no party is the
12 prevailing party for any purpose in connection with these dismissals.

13 4. Plaintiff shall give notice of this dismissal
14 to LWDA within 5 days of the order

DATE: 6/9/21


The Honorable Brad Seligman
Judge of the Superior Court

SUPERIOR COURT OF CALIFORNIA
COUNTY OF ALAMEDA

Case Number: RG20065903

Case Name: Labra v. Ross Dress for Less, Inc.

RE: ORDER DISMISSING REPRESENTATIVE ALLEGATIONS UNDER THE
PRIVATE ATTORNEYS GENERAL ACT, LABOR CODE SEC. 2699, ET SEQ.
WITHOUT PREJUDICE

CLERK'S CERTIFICATE OF SERVICE

I certify that I am not a party to this cause and that a true and correct copy of the foregoing document was mailed first class, postage prepaid, in a sealed envelope, and that the mailing of the foregoing and execution of this certificate occurred at 1225 Fallon Street, Oakland, California.

Executed: 6/9/2021

Jhalisa Castaneda
Courtroom Clerk, Dept. 23

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Gregory D. Wolflick Theodore S. Khachaturian WOLFLICK, DKACHATURIAN & BOUYAD, APC 130 N. Brand Boulevard, Suite 410 Glendale, CA 91203 greg@wolfsim.com theo@wolfsim.com	<i>Attorneys for Defendant, Ross Stores Inc., Ross Dress for Less</i>