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6
7 SUPERIOR COURT OF THE STATE OF CALIFORNIA
8 FOR THE COUNTY OF LOS ANGELES UNLIMITED JURISDICTION
9

10 Dhananjay Kulkarni, an individual,
11 Plaintiff;

12 vs.

13 Kennard Development Group, dba KDG
14 Construction Consulting, a corporation;
15 Parsons Corporation, a corporation; and
16 DOES 1-50.

17 Defendants.
18

CASE NO. 20STCV22056

**STIPULATION FOR ORDER APPROVING
VOLUNTARY DISMISSAL OF PAGA
REPRESENTATIVE ACTION CLAIMS;
[PROPOSED] ORDER**

Dept: 50

Judge: Theresa A. Beaudet

Filed: June 11, 2020

19 IT IS HEREBY STIPULATED by and between Plaintiff DHANANJAY KULKARNI
20 (“Plaintiff”), on the one hand, and DEFENDANTS KENNARD DEVELOPMENT GROUP DBA
21 KDG CONSTRUCTION CONSULTING and PARSONS CORPORATION (“Defendants”), on
22 the other, (collectively, Plaintiff and Defendants shall be known as “Stipulating Parties”), by and
23 through their counsel of record, as follows:

24 1. On or about June 11, 2020, Plaintiff filed the above-captioned individual
25 retaliation, UCL, and tort claims, as well as a representative (Private Attorneys General Act, or
26 “PAGA”) action in this Court, for labor code violations against Defendants.

27 2. The Stipulating Parties have entered into a confidential resolution with respect to
28 Plaintiff’s individual claims. No amount will be paid to or on behalf of any “aggrieved

employees” other than Plaintiff as part of that resolution and no other employees’ interests will be impacted other than the interest of Plaintiff.

NOW, THEREFORE, THE STIPULATING PARTIES DO HEREBY FURTHER AGREE AND STIPULATE AS FOLLOWS, SUBJECT TO COURT APPROVAL:

1. The PAGA claim under Labor Code Section 2698 *et seq.* alleged in the operative Complaint (the fifth cause of action) as to every aggrieved employee other than Plaintiff will be dismissed without prejudice in its entirety as to all defendants.

2. The individual claims of Plaintiff, including his individual PAGA claim and standing to pursue a PAGA claim, will be dismissed with prejudice in its entirety as to all defendants.

3. This Stipulation may be signed in counterparts, each of which so executed shall, irrespective of the date of its execution and delivery, be deemed an original and all such counterparts together shall constitute the same instrument.

Dated: April 30, 2021

HENNIG KRAMER RUIZ & SINGH LLP

By:



Rob Hennig
Brandon Ruiz
Attorneys for Plaintiff DHANANJAY
KULKARNI

(signatures continued on the next page)

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LEWIS BRISBOIS BISGAARD & SMITH LLP

DATED: May 10, 2021

By: 
Wesley A. Krueger
Gabriel Mendoza
Attorneys for Defendant
Kennard Development Group (KDG)

SEYFARTH SHAW, LLP

DATED: May 10, 2021

By: 
Elisabeth Watson
Attorneys for Defendant
Parsons Corporation

ORDER

The Court, having reviewed the foregoing Stipulation and good cause appearing therefore, orders as follows:

1. The Stipulation is granted.
2. The PAGA claim alleged in the operative Complaint (the fifth cause of action), as to every aggrieved employee is dismissed without prejudice in its entirety as to all defendants.
3. The individual claims of Plaintiff, including his individual PAGA claim and standing to pursue a PAGA claim, is dismissed with prejudice in its entirety as to all defendants.

IT IS SO ORDERED.

Dated: _____

JUDGE OF THE SUPERIOR COURT