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Attorneys for Plaintiff Angela Steelman, on behalf of herself and all “aggrieved employees” pursuant to Labor Code § 2698 *et seq.*

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

ANGELA STEELMAN, on behalf of herself
and all “aggrieved employees” pursuant to
Labor Code § 2698 *et seq.*,

Plaintiffs,

v.

3515 HOUSTON HOSPITALITY, LLC, a
California limited liability company, 5774
MELROSE HOSPITALITY, LLC, a
California limited liability company, MARK
HOUSTON, an individual, JONATHAN
HOUSTON, an individual, and DOES 1
through 10, inclusive,

Defendants.

CASE NO: 20STCV36213

*Assigned to the Hon. Mel Red Recana, Dept.
45*

**PLAINTIFF’S REQUEST FOR
DISMISSAL OF PAGA
REPRESENTATIVE CLAIMS;
[PROPOSED] ORDER**

[Filed Concurrently: Declaration of Daniel F.
Gaines in Support of Request for Dismissal of
Representative Action]

Complaint Filed: September 22, 2020

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Dated: May 12, 2023

By: Daniel F. Gaines
DANIEL F. GAINES
Attorneys for Plaintiff

Based on the Request for Dismissal and the concurrently-filed Declaration of Daniel F. Gaines, it is hereby ORDERED that this action is dismissed WITH PREJUDICE as to Plaintiff's individual claims and WITHOUT PREJUDICE as to the PAGA representative claims.

Dated: _____

JUDGE OF THE SUPERIOR COURT

1 **PROOF OF SERVICE AND CERTIFICATION**

2 I am employed in the County of Ventura, State of California. I am over the age of 18 and not a party to the
3 within action; my business address is 4550 East Thousand Oaks Boulevard, Suite 100, Westlake Village, CA 91362.

4 _____ (For messenger) my business address is:

5 On May 12, 2023, I served the foregoing document described as **PLAINTIFF'S REQUEST FOR DISMISSAL**
6 **OF PAGA REPRESENTATIVE CLAIMS; [PROPOSED] ORDER** on the interested parties in this action by placing
7 a true copy thereof enclosed in sealed envelopes addressed as follows:

8 **D. Jay Ritt, Esq.**
9 **RITT HODGES LLP**
10 **65 N. Raymond Ave., Suite 320**
11 **Pasadena, CA 91103**
12 **ritt@rtthlaw.com**

13 **Joseph Tojarieh, Esq.**
14 **STONEBROOK LAW**
15 **10250 Constellation Blvd., Suite 100**
16 **Los Angeles, CA 90067**
17 **jft@stonebrooklaw.com**

18 _____ (BY ☐ U.S. MAIL/ BY ☐ CERTIFIED MAIL, RETURN RECEIPT REQUESTED) The sealed envelope was
19 mailed with postage thereon fully prepaid. I am "readily familiar" with the firm's practice of collection
20 and processing correspondence for mailing. It is deposited with United States postal service on that same
21 day in the ordinary course of business. I am aware that on motion of party served, service is presumed
22 invalid if postal cancellation date or postage meter date is more that one day after date of deposit for
23 mailing in affidavit.

24 _____ (BY FEDERAL EXPRESS OR OTHER OVERNIGHT SERVICE) I deposited the sealed envelope in a box or
25 other facility regularly maintained by the express service carrier or delivered the sealed envelope to an
26 authorized carrier or driver authorized by the express carrier to receive documents.

27 X (BY ELECTRONIC SERVICE) The above-stated document was submitted for service by electronic transmission
28 via email pursuant to an agreement between counsel on the counsel of record listed above.

29 X (UPLOADED TO LWDA WEB PORTAL) I caused the above-described documents to be delivered to the Labor
30 & Workforce Development Agency via online process at the PAGA Filing website (www.dir.ca.gov)
31 in accordance with the procedure imposed by the LWDA.

32 I certify that the above document was printed on recycled paper.

33 I declare under penalty of perjury that the foregoing is true and correct.

34 Executed on May 12, 2023, at Westlake Village, California.

35 
36 _____
37 JEREMY REYES