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FILED
 Superior Court of California
 County of Los Angeles
 11/07/2024

David W. Slayton, Executive Officer / Clerk of Court
 By: D. Vallin Deputy

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

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

10 NICOLE AUCEDA, on behalf of herself and
 11 all “aggrieved employees” pursuant to Labor
 Code § 2698 *et seq.*,

12 Plaintiffs,

13 v.

14 GRANADA HILLS CONVALESCENT
 15 HOSPITAL, INC., a California corporation,
 16 and DOES 1 through 10, inclusive,

17 Defendants.
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CASE NO: 21CHCV00093

*Assigned to the Hon. David B. Gelfound, Dept.
 F49*

**PLAINTIFF’S REQUEST FOR
 DISMISSAL; ~~PROPOSED~~ ORDER**

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

*Trial Date: March 10, 2025
 Complaint Filed: February 9, 2021
 FAC Filed: October 21, 2022*

REQUEST FOR DISMISSAL

Based on the facts set forth in the concurrently-filed Declaration of Daniel F. Gaines, Plaintiff NICOLE AUCEDA ("Plaintiff") hereby requests that the Court enter a dismissal of this action **WITH PREJUDICE** as to Plaintiff's individual claims and **WITHOUT PREJUDICE** as to the PAGA representative claims.

Dated: November 6, 2024

Respectfully submitted,
GAINES & GAINES, APLC

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

~~PROPOSED~~ ORDER

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.



DeB. Gelfound

Dated: 11/08/2024

David B. Gelfound / Judge

JUDGE OF THE SUPERIOR COURT

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_____ (For messenger) my business address is:

David M. Browne, Esq.
21900 Burbank Blvd., Suite 112
Woodland Hills, CA 91367
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_____ (BY FEDERAL EXPRESS OR OTHER OVERNIGHT SERVICE) I deposited the sealed envelope in a box or other facility regularly maintained by the express service carrier or delivered the sealed envelope to an authorized carrier or driver authorized by the express carrier to receive documents.

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

Executed on November 6, 2024, at Westlake Village, California.

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PROOF OF SERVICE