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PLAINTIFF/PETITIONER: Krista Robles	CASE NUMBER:
DEFENDANT/RESPONDENT: Central Innovations, LLC	30-2021-01178892-CU-OE-CXC

**PROOF OF SERVICE BY FIRST-CLASS MAIL
NOTICE OF ENTRY OF JUDGMENT OR ORDER**

(NOTE: You cannot serve the Notice of Entry of Judgment or Order if you are a party in the action. The person who served the notice must complete this proof of service.)

1. I am at least 18 years old and **not a party to this action**. I am a resident of or employed in the county where the mailing took place, and my residence or business address is (*specify*): 27200 Agoura Road, Suite 101, Calabasas, CA 91301

2. I served a copy of the *Notice of Entry of Judgment or Order* by enclosing it in a sealed envelope with postage fully prepaid and (*check one*):

- a. ☐ deposited the sealed envelope with the United States Postal Service.
- b. ☒ placed the sealed envelope for collection and processing for mailing, following this business's usual practices, with which I am readily familiar. On the same day correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service.

3. The *Notice of Entry of Judgment or Order* was mailed:

- a. on (*date*): 11/17/21
- b. from (*city and state*): Calabasas, CA

4. The envelope was addressed and mailed as follows:

a. Name of person served:

JL Sean Slattery, Esq.; Carlsbad Law Group LLP

Street address: 5050 Avenida Encinas, Suite 300

City: Carlsbad

State and zip code: CA 92008

c. Name of person served:

Street address:

City:

State and zip code:

b. Name of person served:

Street address:

City:

State and zip code:

d. Name of person served:

Street address:

City:

State and zip code:

☐ Names and addresses of additional persons served are attached. (*You may use form POS-030(P).*)

5. Number of pages attached 3.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 11/17/21

Beatriz Franco

(TYPE OR PRINT NAME OF DECLARANT)



Beatriz Franco

(SIGNATURE OF DECLARANT)

41259949

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE
CENTRAL JUSTICE CENTER
NOV 16 2021
DAVID H. YAMASAKI, Clerk of the Court
BY: _____, DEPUTY

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Attorneys for Plaintiff Krista Robles, on behalf of herself and on behalf of all similarly situated individuals

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

KRISTA ROBLES, on behalf of herself and all
"aggrieved employees" pursuant to Labor Code §
2698 *et seq.*,

Plaintiffs,

v.

CENTRAL INNOVATIONS, LLC, a Wyoming
limited liability company, and DOES 1 through
10, inclusive,

Defendants.

CASE NO: 30-2021-01178892-CU-OE-CXC

*Assigned to the Hon. James J. Di Cesare,
Department C-16*

**STIPULATION AND ~~PROPOSED~~ ORDER
DISMISSING ACTION**

[Filed Concurrently with Declaration of Daniel
F. Gaines]

Complaint Filed: January 14, 2021

STIPULATION

WHEREAS, on January 14, 2021, Plaintiff Krista Robles, on behalf of herself and all similarly situated individuals, filed a class and representative action complaint against Central Innovations, LLC, a Wyoming limited liability company alleging violations of Labor Code §§ 201-203, 226(a), 226.7, 226.8, 510, 512, 558, 1194, and 1194.2, Business and Professions Code § 17200, and Labor Code § 2699(f) for violations of Labor Code §§ 201-203, 226(a), 226.7, 510, 512, 1194 and Labor Code § 2699(a) for

1 violations of Labor Code §§ 226.3, 226.8, and 558 ("Complaint"). See Declaration of Daniel F. Gaines
2 ("Gaines Decl."), at ¶ 2.

3 WHEREAS, on or about March 12, 2021, Defendant filed its Answer to Plaintiff's Complaint.
4 Gaines Decl. at ¶ 3.

5 WHEREAS, Plaintiff and Defendant (hereinafter collectively, the "Parties") engaged in formal
6 and informal discovery, followed by extensive discussions of Plaintiff's claims and Defendant's defenses.
7 Gaines Decl. at ¶ 4.

8 WHEREAS, on October 29, 2021, the Parties engaged in a successful mediation with the help of
9 Scott Markus, Esq., a respected and well-known mediator. Gaines Decl. at ¶ 5.

10 WHEREAS, based on the fact that there are only twelve (12) "class members" and eight (8)
11 "aggrieved employees" who worked fewer than 50 aggregate pay periods during the six (6) month period
12 during which Defendant operated before shutting down, the Parties agreed to resolve the claims of Plaintiff
13 individually, in exchange for a dismissal of such claims with prejudice, and dismiss the claims of all other
14 "class members" and "aggrieved employees" without prejudice. Gaines Decl. at ¶ 6.

15 WHEREAS, the Parties have agreed that Defendant shall pay Plaintiff \$40,000 in exchange for
16 the release and dismissal with prejudice of her individual claims. Gaines Decl. at ¶ 6; Exhibit A to Gaines
17 Decl.

18 WHEREAS, the settlement between Plaintiff and Defendant does not contemplate the waiver of
19 any claims by anyone other than Plaintiff and does not provide for the waiver of the class and PAGA
20 claims asserted on behalf of any employee, such that there is no allocation to class damages or PAGA
21 penalties in the settlement. Gaines Decl. at ¶ 7.

22 WHEREAS, the absent employees will not be prejudiced, no notice of the pendency of this Action
23 has been given to them, and this settlement preserves their rights and promotes judicial efficiency and
24 economy by curtailing costly litigation and resolving an action in the best manner possible. Gaines Decl.,
25 ¶ 8.

26 WHEREAS, concurrent with the filing of this Stipulation, the Parties have submitted the
27 Settlement Agreement to the LWDA in compliance with Labor Code section 2699(1)(2). Gaines Decl., ¶
28 9.

1 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the Parties hereto and
2 through their respective attorneys of record that Plaintiff's claims shall be dismissed *with* prejudice, and
3 the PAGA claims and claims asserted on behalf of other employees in the Action shall be dismissed *without*
4 prejudice.

5 **IT IS SO STIPULATED.**

6 Dated: November 16, 2021

7 For Plaintiff:
8 GAINES & GAINES, APLC

For Defendant:
Carlsbad Law Group, LLP

9
10 By: _____
Daniel F. Gaines, Esq.

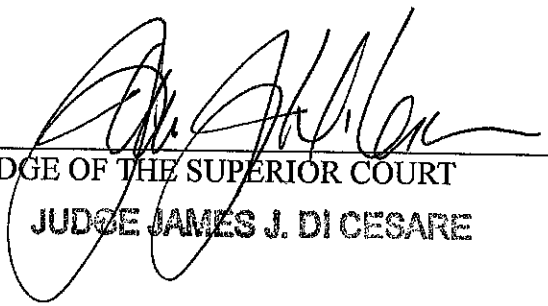
By: _____
David P. Hall, Esq.

11
12
13 **ORDER**

14 The Court, having reviewed the Parties' stipulation and any and all supporting papers, hereby
15 ORDERS that this Action is hereby DISMISSED WITH PREJUDICE as to Plaintiff Krista Robles'
16 individual claims, and DISMISSED WITHOUT PREJUDICE as to the PAGA claims and claims asserted
17 on behalf of other employees.

18 **IT IS SO ORDERED.**

19
20 Dated: NOV 16 2021

21 
22 JUDGE OF THE SUPERIOR COURT
23 JUDGE JAMES J. DI CESARE
24
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