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Attorneys for Plaintiff,
JEREMIAH FREED

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

JEREMIAH FREED, an individual, and on
behalf of all aggrieved employees

Plaintiff,

v.

MASHCOLE PROPERTY MANAGEMENT,
INC., a California corporation; CRAIG SENIA,
an individual; JOEL ZIDE, an individual; and
DOES 3 through 50 inclusive,

Defendants.

Case No. 21STCV08700

Hon. Barbara M. Scheper, Dept. 30

**[Proposed] ORDER ON STIPULATION
AND REQUEST FOR DISMISSAL OF
INDIVIDUAL ACTION WITH
PREJUDICE AND PAGA ACTION
WITHOUT PREJUDICE**

Complaint filed: March 5, 2021
Trial Date: None Set

The court, having reviewed the parties' Stipulation and Request for Dismissal of Individual Action with Prejudice and PAGA Action Without Prejudice, and finding that GOOD CAUSE has been shown, hereby ORDERS that the above-captioned action is dismissed in its entirety without hearing. The dismissal shall be *with prejudice* as to Plaintiff Jeremiah Freed who has reached a settlement as to his individual claims only, and *without prejudice* as to the claims under the Private Attorneys General Act ("PAGA") (Lab. Code, § 2698 et seq.) of all other aggrieved employees.

IT IS SO ORDERED.

Dated: _____

Hon. Barbara M. Scheper
Judge of the Superior Court

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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the State of California, County of Los Angeles. I am over the age of 18 and not a party to the within lawsuit; my business address is 15515 W. Sunset Boulevard, Unit 214, Pacific Palisades, CA 90272.

On August 23, 2023, I served the foregoing document described as **[Proposed] ORDER ON STIPULATION AND REQUEST FOR DISMISSAL OF INDIVIDUAL ACTION WITH PREJUDICE AND PAGA ACTION WITHOUT PREJUDICE** on the interested parties in this action by transmitting a true copy thereof to:

Robert S. Cooper
Graham Lambert
Michelle Lopez
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1000 Wilshire Blvd., Suite 1500
Los Angeles, CA 90017-2457
rcooper@buchalter.com
glambert@buchalter.com
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Labor and Workforce Development
Agency
(By Posting on the LWDA PAGA
Website)

*Attorneys for Defendants
Mashcole Property Management, Inc.,
Craig Senia, and Joel Zide*

- ☐ (BY MAIL): as follows: I deposited the envelopes for mailing in the ordinary course of business at Los Angeles County, California. I am "readily familiar" with this firm's practice of collection and processing correspondence for mailing. Under that practice, the sealed envelopes are deposited with the U.S. Postal Service that same day in the ordinary course of business, with postage thereon fully prepaid at Los Angeles County, California.
- ☐ (BY OVERNIGHT DELIVERY): as follows: I am "readily familiar" with this firm's practice of collection and processing correspondence for overnight delivery. Under that practice, overnight packages are enclosed in a sealed envelope with a packing slip attached thereto fully prepaid. The packages are picked up by the carrier at our offices or delivered by our office to a designated collection site.
- ☒ (BY E-MAIL): I hereby certify that this document was served from Los Angeles County, California, by e-mail delivery on the parties listed herein at their most recent known e-mail address or e-mail of record in this action.

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

Executed on August 23, 2023, at Los Angeles County, California.

Calvin A. Marshall, Esq.

Type or Print Name



Signature