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11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **FOR THE COUNTY OF VENTURA**
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14 ADAM GUTIERREZ, an individual,

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16 Plaintiff,

17 vs.

18 THOMPCO INC., and DORI DAWNE
19 THOMPSON, an individual; and DOES 1-20
inclusive,

20 Defendants.
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CASE NO.: 56-2020-00547283-CU-OE-VTA
[Consolidated with 56-2021-00550949-CU-OE-VTA]

**[PROPOSED] ORDER RE: DISMISSAL OF
CLASS CLAIMS PURSUANT TO CAL.
RULE OF COURT 3.700**

1 **[PROPOSED] ORDER**

2 Having reviewed the Declaration of Daniel J. Bass, and finding the dismissal
3 request in compliance with California law, including California Rule of Court 3.770, the Court
4 finds good cause and hereby GRANTS the Request for Dismissal as follows:

5 1) The class claims and representative claims pursuant to the Private Attorneys General
6 Act (“PAGA”) in the two lawsuits entitled *Adam Gutierrez v. Thompco Inc. et al.* under Case No.
7 56-2020-00547283-CU-OE-VTA and Case No. 56-2021-00550949- CU-OE-VTA are dismissed
8 without prejudice as to the putative class members and other potentially aggrieved employees;

9 2) The individual claims of Plaintiff Adam Gutierrez in the two lawsuits entitled *Adam*
10 *Gutierrez v. Thompco Inc. et al.* under Case No. 56-2020-00547283-CU-OE-VTA and Case No.
11 56-2021-00550949- CU-OE-VTA are dismissed with prejudice; and

12 3) The Court shall maintain jurisdiction over the parties pursuant to Code of Civil
13 Procedure § 664.6 as necessary to enforce settlement.

14 **IT IS SO ORDERED.**

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16 DATED: _____

17 SUPERIOR COURT JUDGE
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