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Attorneys for Plaintiffs, CARLOS FIGUEROA, and FELIPE
SANDOVAL, individually, and on behalf of similarly
situated employees

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES-SPRING STREET COURTHOUSE**

CARLOS FIGUEROA, and FELIPE
SANDOVAL, individually, and on behalf of
similarly situated employees,

Plaintiffs,

v.

GLORIA LANCE, INC., and DOES 1 -100,
inclusive,

Defendants.

) Case No. 21STCV14431 [UNLIMITED
) CASE, CLASS ACTION]
)
) [Assigned to Honorable Carolyn B. Kuhl
) Department: 12]
)
) **[PROPOSED] ORDER GRANTING**
) **APPLICATION FOR DISMISSAL**
) **WITHOUT PREJUDICE, OF THE**
) **REPRESENTATIVE CLAIMS UNDER**
) **PAGA AND DISMISSING WITH**
) **PREJUDICE PLAINTIFFS REMAINING**
) **INDIVIDUAL CLAIMS. AND**
) **GRANTING APPLICATION FOR**
) **ORDER PERMITTING FILING OF**
) **CONFIDENTIAL SETTLEMENT**
) **AGREEMENT UNDER SEAL**

Date Filed: April 15, 2021
Trial Date: NONE

The court having considered Plaintiffs application for relief and good cause appearing

1 therefor:

2 IT IS HEREBY ORDERED

3 The PAGA claims on behalf of aggrieved employees are dismissed without prejudice.
4 Plaintiffs' remaining individual claims set forth in this lawsuit, based on any theory of recovery,
5 are dismissed with prejudice.

6 The request for approval of the parties' settlement, to the extent that it does not involve any
7 payment to the Labor Workforce Development Agency ("LWDA") under Labor Code Section
8 2699, is hereby approved. Counsel for Plaintiffs is ordered to notify the LWDA of this Order
9 within seven days of receipt of notice of the entry of this Order.

10 Plaintiffs application to permit the filing of the confidential settlement agreement of the
11 parties under seal is hereby granted, and the settlement agreement previously lodged conditionally
12 under seal as exhibit 1 to the Declaration of Stephen M. Harris is hereby filed under seal.

13
14
15 Dated: _____, 2024

The Honorable Carolyn B. Kuhl
Judge of the Superior Court of the State of
California

PROOF OF SERVICE
Figueroa v. Gloria Lance
Case No. 21STCV14431

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES:

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and am not a party to the within action. My business address is 6320 Canoga Avenue, Suite 1500, Woodland Hills, California 91367. On February 12, 2024, I caused the foregoing document(s) described as PROPOSED ORDER to be served on the interested parties in this action as follows:

By placing a true copy thereof enclosed in a sealed envelope(s) addressed as stated on the attached mailing list.

☒ **BY ELECTRONIC SUBMISSION:** I served the above listed document(s) described via CASE ANYWHERE on the designated recipients via electronic transmission through the CASE ANYWHERE web site. CASE ANYWHERE will generate a Notice of Electronic Service (NES) to the serving party and any registered users in the case. The NES will constitute service of the document(s). Registration as a CASE ANYWHERE user constitutes consent to electronic service through the CASE ANYWHERE'S transmission facility.

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

Executed on February 12, 2024, at Woodland Hills, California.

Stephen M. Harris
(Type or print name)

/s/ Stephen M. Harris
(Signature)

SERVICE LIST
Figueroa v. Gloria Lance
Case No. 21STCV14431

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