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VENTURA SUPERIOR COURT

JUN 08 2023

Justin Lo (SBN 280102)
Justin@caworklawyer.com

May T. To (SBN 305268)
may@caworklawyer.com

WORK LAWYERS PC
22939 Hawthorne Blvd., #202
Torrance, CA 90505
Tel: (424) 355-8535
Fax: (949) 258-8970

Attorneys for Plaintiff Laura Randolph

David L. Martin (SBN 253858)
Ethan Lai (SBN 347130)
MARTIN LAW FIRM, PC
19800 MacArthur Blvd., Ste. 680
Irvine, CA 92612
dave@employmentdefenselaw.com
ethan@employmentdefenselaw.com
Tel: (949) 868-2838

*Attorneys for Defendant ACSR, LLC (erroneously
sued as Aspen Skilled Healthcare, Inc.)*

Michael S. Kun, Esq.
Amish A. Shah, Esq.
EPSTEIN BECKER & GREEN, P.C
1925 Century Park East Suite 500
Los Angeles, CA 90067
MKun@ebglaw.com
AAShah@ebglaw.com
Tel: (310) 556-8861
Fax: (310) 553-2165

*Attorneys for Defendants Maxim
Healthcare Staffing Services, Inc. and
Maxim Healthcare Services, Inc.*

VENTURA SUPERIOR COURT

FILED

06/22/2023

Brenda L. McCormick
Executive Officer and Clerk

Cristal Alvarez

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

LAURA RANDOLPH, on behalf all others
aggrieved employees,

Plaintiff,

v.

MAXIM HEALTHCARE STAFFING
SERVICES, INC., a Maryland Corporation
Doing Business in California; MAXIM
HEALTHCARE SERVICES, INC., a Maryland
Corporation Doing Business in California;
MAXIM HEALTHCARE SERVICES
HOLDING, INC., a Delaware Corporation
Doing Business in California; ASPEN
SKILLED HEALTHCARE, INC., a California
Corporation; and DOES 1- 50, Inclusive,

Defendants,

Case No. 56-2022-00562503-CU-OE-VTA

*Assigned for all purposes to the Hon. Henry
Walsh, Dept. 42*

**JOINT STIPULATION AND ~~PROPOSED~~
ORDER FOR DISMISSAL OF CASE**

Complaint: February 1, 2022

PDF FILING

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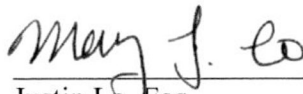
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1 to dismiss Plaintiff's entire PAGA Action against all Defendants named in the PAGA Complaint
2 with prejudice as to her individual PAGA claim and without prejudice as to all other persons and
3 the LWDA.

4
5 **IT IS SO STIPULATED.**

6
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8 Dated: June 8, 2023

WORK LAWYERS PC

9 

10 Justin Lo, Esq.

11 May T. To, Esq.

12 Attorneys for Plaintiff Laura Randolph

13
14 Dated: June 8, 2023

EPSTEIN BECKER & GREEN, P.C

15 

16 Michael S. Kun, Esq.

17 Amish A. Shah, Esq.

18 Attorneys for Defendants Maxim Healthcare
19 Staffing Services, Inc. and Maxim Healthcare
20 Services, Inc.

21
22 Dated: June 8, 2023

MARTIN LAW FIRM, PC

23 

24 David L. Martin, Esq.

25 Ethan Lai, Esq.

26 Attorneys for Defendant ACSR, LLC (erroneously
27 sued as Aspen Skilled Healthcare, Inc.)
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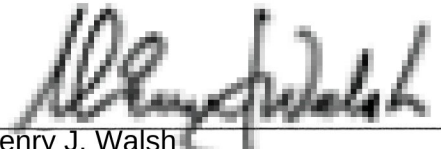
~~PROPOSED~~ ORDER

For good cause shown, and based upon the Stipulation of the Parties set forth above, the Court orders as follows:

1. Plaintiff Laura Randolph's PAGA Action is dismissed with prejudice against all Defendants named in the PAGA Complaint with respect to Plaintiff's individual PAGA claim;
2. Plaintiff Laura Randolph's PAGA Action is dismissed without prejudice against all Defendants named in the PAGA Complaint with respect to all other persons and the Labor and Workforce Development Agency.

IT IS SO ORDERED.

DATED: 06/16/2023


Henry J. Walsh
JUDGE OF THE SUPERIOR COURT

PROOF OF SERVICE

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 years and am not a party to the within action. My business address is 22939 Hawthorne Blvd., Suite 202, Torrance, California 90505. On June 8, 2023 I served the foregoing document(s) described as: **JOINT STIPULATION AND [PROPOSED] ORDER FOR DISMISSAL OF CASE** to the interested parties in this action as follows: by placing a true copy thereof enclosed in sealed envelopes, addressed as follows:

Michael S. Kun, Esq. Amish A. Shah, Esq. EPSTEIN BECKER & GREEN, P.C 1925 Century Park East Suite 500 Los Angeles, CA 90067 MKun@ebglaw.com AAShah@ebglaw.com bcscott@ebglaw.com <i>Attorney for Defendant Maxim Healthcare Staffing Services, Inc. and Maxim Healthcare Services, Inc.</i>	David L. Martin, Esq. Ethan Lai, Esq. MARTIN LAW FIRM, PC 19800 MacArthur Blvd., Ste. 680 Irvine, CA 92612 dave@employmentdefenselaw.com ethan@employmentdefenselaw.com teresa@employmentdefenselaw.com vincent@employmentdefenselaw.com <i>Attorneys for Defendant ACSR, LLC, erroneously sued as Aspen Skilled Healthcare, Inc.</i>
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☐ BY MAIL: I deposited such envelope in the mail at Los Angeles, California. The envelope was mailed with postage thereon fully prepaid. I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☐ IN PERSON: I personally served the above-mentioned documents.

XX BY E-MAIL: I sent the documents by e-mail to the e-mail address mentioned above.

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

Executed on June 8, 2023, at Torrance, California.


Juliana Villalobos