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Attorneys for Plaintiffs and Putative Class

SUPERIOR COURT FOR THE STATE OF CALIFORNIA
COUNTY OF RIVERSIDE

MACKENNA CUMMINGS, individually and
on behalf of all others similarly situated,

vs.

PLATT COLLEGE LOS ANGELES LLC, a
Limited Liability Company,

Respondent.

CASE NO. CVRI2200578

**JOINT STIPULATION TO DISMISS PAGA
REPRESENTATIVE ACTION; ~~PROPOSED~~
ORDER OF DISMISSAL**

1 Plaintiff Mackenna Cummings and Platt College Los Angeles, LLC hereby stipulate and request
2 as follows:

3 1. On February 10, 2022, Plaintiff filed her PAGA Representative Action Complaint on
4 behalf of adjunct instructors and other individuals employed by Defendant in California (“Aggrieved
5 Employees”) from July 23, 2020 to the present (“PAGA Period”) for Defendant’s alleged violations of
6 Labor Code §§ 223, 1194, 1194.2, 226.7, 512, 201-203, 246, *et seq.* and Wage Order No. 4- 2001 §§ 4,
7 11 and 12.

8 2. On February 15, 2022, Plaintiff filed her Notice of Related Case identifying two actions
9 pending in Los Angeles County Superior Court asserting similar claims on behalf of a similar group of
10 employees: *Kent Broersma v. Platt College Los Angeles*, Case No. 20STCV47502, a class action lawsuit
11 filed December 10, 2020; and *Alisha Claire Williams v. Platt College Los Angeles, LLC, Inc., and Oasis*
12 *Outsourcing III, Inc.*, Case No. 21STCV03896, a PAGA representative action lawsuit filed January 9,
13 2021 (collectively referred to as the “Related Cases”).

14 3. On February 10, 2022, Defendant and plaintiffs in the Related Cases attended a mediation
15 with mediator Marc Feder and reached an agreement in principal to settle the Related Cases on a class-
16 wide basis. Thereafter, Plaintiff, Defendant, and plaintiffs in the Related Cases, stipulated to file an
17 Amended Complaint in the first-filed *Broersma* case, naming all parties and all causes of action alleged
18 in this Action, and in the Related Cases. A copy of the First Amended Complaint filed on June 21, 2022,
19 is attached to the Declaration of Julian Hammond, filed herewith.

20 4. Neither Plaintiff nor Plaintiff’s Counsel are receiving any consideration, direct or indirect,
21 for dismissing this action.

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5. Therefore, the parties respectfully request that the Court dismiss this Action without prejudice.

IT IS SO STIPULATED.

DATED:

HAMMONDLAW, P.C.

By: s/ Julian Hammond
Julian Hammond
Attorney for Plaintiff and the Proposed Class

FISHER & PHILLIPS LLP

By: s/ Andrew Crane
Jeffrey Thurrell
Andrew Crane
Attorneys for Defendant

~~PROPOSED~~ ORDER

The Court, having reviewed and considered the Stipulation of the parties, and good cause appearing, hereby ORDERS that the above-entitled action is dismissed without prejudice.

Dated: 07/10/2022


Hon. Craig Reimer – Honorable Craig Reimer
Judge of the Superior Court