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Attorneys for Plaintiff,
LAURA SANCHEZ and DREW KARTCHNER

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

LAURA SANCHEZ, an individual, on behalf
of herself, and on behalf of all aggrieved
employees; and DREW KARTCHNER, an
individual, on behalf of himself,

Plaintiffs,

vs.

GREATDANE CATERING AND EVENTS,
LLC, a California corporation; RANNI
KUMGISKY, an individual; DANE
PEARSON, an individual; and DOES 1
through 50 inclusive

Defendants.

Case No.: **22STCV00612**
Hon. Kenneth R. Freeman, Dept. 14

**DECLARATION OF CALVIN A.
MARSHALL IN SUPPORT OF
REQUEST FOR DISMISSAL OF PAGA
ACTION WITHOUT PREJUDICE**

**(Submitted with 1) Request For Dismissal
of PAGA Action Without Prejudice; and,
2) Proposed Order)**

Complaint filed: January 6, 2022
Trial Date: None Set

1 I, Calvin A. Marshall declare:

2 1. I am an attorney, licensed to practice before this Court. Unless the context indicates
3 otherwise, I have personal knowledge of the facts stated in this declaration, know them to be true, and
4 could and would testify to those facts if called as a witness.

5 2. I am an attorney for Plaintiffs LAURA SANCHEZ and DREW KARTCHNER
6 (“Plaintiffs”) in the above-captioned matter.

7 3. On July 21, 2022, Plaintiffs LAURA SANCHEZ and DREW KARTCHNER
8 (“Plaintiffs”) filed their First Amended Class Action Complaint For Damages and Injunctive Relief;
9 Enforcement Action Under The Private Attorneys General Act, California Labor Code § 2698, et seq.
10 (“FAC”) as against Defendants GREATDANE CATERING AND EVENTS, LLC, a California
11 corporation; RANNI KUMGISKY, an individual; and DANE PEARSON, an individual,
12 (“Defendants”), alleging individual claims for violations of the Labor Code.

13 4. Plaintiff LAURA SANCHEZ, in her Tenth Cause of Action, alleged claims for
14 violations of the Labor Code on behalf of all aggrieved employees under the Private Attorneys
15 General Act (“PAGA”) (Lab. Code, § 2698 et seq.).

16 5. Besides Plaintiff LAURA SANCHEZ, Plaintiffs have confirmed that that there only a
17 total of five potentially aggrieved employees, as Defendants operated a small restaurant, often staffed
18 by one person, with long term employees.

19 6. The Detour Bistro restaurant has closed, and Defendants have represented that they are
20 judgment proof, laden with debts, and their only asset is a liquor license.

21 7. As a result of protracted negotiations, the parties have entered into a settlement
22 agreement under which the parties have agreed to the dismissal of Plaintiff’s PAGA claims **without**
23 **prejudice**.

24 8. No notice of this action has been given to any aggrieved employee.

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1 9. Notice of this Request has been forwarded to the Labor and Workforce Development
2 Agency (LWDA).

3
4 I declare under penalty of perjury under the laws of the State of California that the foregoing
5 is true and correct.

6 DATED: February 24, 2025


Calvin A. Marshall

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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 **February 24, 2025**, I served the foregoing document described as **DECLARATION OF CALVIN A. MARSHALL IN SUPPORT OF REQUEST FOR DISMISSAL OF PAGA ACTION WITHOUT PREJUDICE** on the interested parties in this action by transmitting a true copy thereof to:

Labor and Workforce Development
Agency
(By Posting on the LWDA PAGA
Website)

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Attorneys for Defendants GREATDANE
CATERING AND EVENTS, LLC, RANNI
KUMGISKY, and DANE PEARSON
(via E-Mail)

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

Executed on **February 24, 2025**, at Los Angeles County, California.

Calvin A. Marshall, Esq.

Type or Print Name



Signature