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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

**REQUEST FOR DISMISSAL OF PAGA
ACTION WITHOUT PREJUDICE AND
NOTICE OF CONDITIONAL
SETTLEMENT OF REMAINING
INDIVIDUAL CLAIMS**

(Submitted with Proposed Order)

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

1 WHEREAS, on July 21, 2022, Plaintiffs LAURA SANCHEZ and DREW KARTCHNER
2 (“Plaintiffs”) filed their First Amended Class Action Complaint For Damages and Injunctive Relief;
3 Enforcement Action Under The Private Attorneys General Act, California Labor Code § 2698, et seq.
4 (“FAC”) as against Defendants GREATDANE CATERING AND EVENTS, LLC, a California
5 corporation; RANNI KUMGISKY, an individual; and DANE PEARSON, an individual,
6 (“Defendants”), alleging individual claims for violations of the Labor Code (*See*, Declaration of
7 Calvin A. Marshall In Support of Request for Dismissal of PAGA Action (Marshall Decl.) at ¶ 3);
8 and

9 WHEREAS Plaintiff LAURA SANCHEZ, in her Tenth Cause of Action, alleged claims for
10 violations of the Labor Code on behalf of all aggrieved employees under the Private Attorneys
11 General Act (“PAGA”) (Lab. Code, § 2698 et seq.) (Marshall Decl. at ¶ 4); and,

12 WHEREAS, besides Plaintiff LAURA SANCHEZ, Plaintiffs have confirmed that that there
13 only a total of five potentially aggrieved employees, as Defendants operated a small restaurant, often
14 staffed by one person, with long term employees (Marshall Decl. at ¶ 5); and,

15 WHEREAS, the Detour Bistro restaurant has closed, and Defendants have represented that
16 they are judgment proof, laden with debts, and their only asset is a liquor license (Marshall Decl. at ¶
17 6); and,

18 WHEREAS, as a result of protracted negotiations, the parties have entered into a settlement
19 agreement under which the parties have agreed to the dismissal of Plaintiff’s PAGA claims **without**
20 **prejudice** (Marshall Decl. at ¶ 7); and

21 WHEREAS, no notice of this action has been given to any aggrieved employee (Marshall
22 Decl. at ¶ 8); and

23 WHEREAS, notice of this Request has been forwarded to the Labor and Workforce
24 Development Agency (LWDA) (Marshall Decl. at ¶ 9);

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28 ///

1 NOW THEREFORE, Plaintiff LAURA SANCHEZ respectfully requests that the Court
2 dismiss the Tenth Cause of Action of Plaintiffs July 21, 2022 Complaint, for claims under the Private
3 Attorneys General Act (“PAGA”) (Lab. Code, § 2698 et seq.), **without prejudice**.

4 Plaintiffs further respectfully requests that the Court act on Plaintiffs’ Request For Dismissal
5 of all remaining individual causes of action, filed concurrently herewith.

6
7 Dated: February 24, 2025

THE OZZELLO PRACTICE, PC
THE LAW OFFICES OF DAVID R. GREIFINGER

8
9 By: 
10 MARK A. OZZELLO
11 DAVID R. GREIFINGER
12 CALVIN A. MARSHALL
13 *Attorneys for Plaintiffs*

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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 **REQUEST FOR DISMISSAL OF PAGA ACTION WITHOUT PREJUDICE AND NOTICE OF CONDITIONAL SETTLEMENT OF REMAINING INDIVIDUAL CLAIMS** 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