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Attorneys for Plaintiff Maryjane Granados, on behalf of herself and all “aggrieved employees” pursuant to Labor Code § 2698 *et seq.*

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF BUTTE

MARYJANE GRANADOS, on behalf of
herself and all “aggrieved employees” pursuant
to Labor Code § 2698 *et seq.*,

Plaintiff,

v.

SHADOWBROOK POST ACUTE LLC, a
California limited liability company, and
DOES 1 through 10, inclusive,

Defendants.

Case No. 22CV00443

*Assigned to the Honorable Tamara L.
Mosbarger, Dept. 1*

**PLAINTIFF’S REQUEST FOR
DISMISSAL; [PROPOSED] ORDER**

[Filed Concurrently: Declaration of Daniel F.
Gaines in Support of Request for Dismissal of
Representative Action]

Complaint Filed: March 4, 2022

1 **REQUEST FOR DISMISSAL**

2 Based on the facts set forth in the concurrently-filed Declaration of Daniel F. Gaines, Plaintiff
3 MARYJANE GRANADOS ("Plaintiff") hereby requests that the Court enter a dismissal of this action
4 ***WITH PREJUDICE*** as to Plaintiff's individual claims and ***WITHOUT PREJUDICE*** as to the
5 PAGA representative claims.

6 Dated: October 2, 2024

Respectfully submitted,
GAINES & GAINES, APLC

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8 By:



DANIEL F. GAINES
Attorneys for Plaintiff

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11 **[PROPOSED] ORDER**

12 Based on the Request for Dismissal and the concurrently-filed Declaration of Daniel F.
13 Gaines, it is hereby ORDERED that this action is dismissed WITH PREJUDICE as to Plaintiff's
14 individual claims and WITHOUT PREJUDICE as to the PAGA representative claims.

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16 Dated: _____

JUDGE OF THE SUPERIOR COURT

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_____ (For messenger) my business address is:

Melissa T. Daugherty, Esq.
Andrew J. Sokolowski, Esq.
O'HAGAN MEYER
550 S. Hope Street, Suite 2400
Los Angeles, CA 90071
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_____ (BY FEDERAL EXPRESS OR OTHER OVERNIGHT SERVICE) I deposited the sealed envelope in a box or other facility regularly maintained by the express service carrier or delivered the sealed envelope to an authorized carrier or driver authorized by the express carrier to receive documents.

 X (UPLOADED TO LWDA WEB PORTAL) I caused the above-described documents to be delivered to the Labor & Workforce Development Agency via online process at the PAGA Filing website (www.dir.ca.gov) in accordance with the procedure imposed by the LWDA.

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

Amelia Booth
AMELIA BOOTH