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Attorneys For Plaintiff
ANA VAHID

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN DIEGO - CENTRAL DIVISION**

ANA VAHID, an individual, on behalf of herself
and other aggrieved employees,

Plaintiff,

v.

LANDMARK WORLDWIDE LLC, a Delaware
corporation; LANDMARK WORLDWIDE
INTERNATIONAL HOLDINGS, INC., a
California corporation; MELANIE RILEY, an
individual; and DOES 1 through 100, inclusive,

Defendants.

Case No.: 37-2022-00025576-CU-OE-CTL

**DECLARATION OF JUSTIN HEWGILL IN
SUPPORT OF PLAINTIFFS' MOTION TO
DISMISS PAGA ACTION WITHOUT
PREJUDICE**

Date: December 5, 2023

Time: 8:30 a.m.

Dept.: C-66

Judge: Hon. Kenneth J. Medel

Complaint Filed: June 29, 2022

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1. I am an attorney duly licensed to practice in California and am a partner at Hewgill, Cobb & Lockard, APC, counsel of record for Plaintiffs in this action. The following information is based upon my personal knowledge. If called upon to do so, I could and would competently testify to the truth of the matters stated herein.

3. On December 01, 2022 Defendant's filed a Motion to Compel Arbitration of Claims Asserted in First Amended Complaint and Stay Proceedings.

5. On February 21, 2023 Defendant's filed a Notice of Appeal.

7. On November 30, 2023 notice was sent to the LWDA notifying them of the Ex Parte Motion to Dismiss Without Prejudice PAGA Cause of Action.

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8. On December 1, 2023 I submitted Plaintiff's Ex Parte Motion to Dismiss Without Prejudice PAGA Action, along with this declaration, and the Proposed Order to the LWDA and informed the Agency of the date and time of the hearing in this matter.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed at San Diego, California, on December 1, 2023.

HEWGILL, COBB & LOCKARD

By: 
Justin Hewgill
Attorney for Plaintiffs