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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF RIVERSIDE

DESIREE BLAIR, individually, and on behalf
of all other similarly situated,

Plaintiff,

v.

AKD 3010 ROYAL, INC., a California
corporation; LITTLE CESAR
ENTERPRISES, INC., a Michigan
corporation; and DOES 1 through 10,
inclusive,

Defendants.

Case No. CVRI2501597

**CLASS & PAGA REPRESENTATIVE
ACTION**

**JOINT STIPULATION AND [PROPOSED
ORDER] TO DISMISS THE MATTER IN
ITS ENTIRETY, INCLUDING CLASS &
PAGA CLAIMS AGAINST DEFENDANT
AKD 3010 ROYAL, INC.**

*[Supporting Declaration of Lauren M. Lendzion
filed Concurrently Herewith]*

Judge: Harold W. Hopp
Dept.: 1

Complaint Filed: March 27, 2025
FAC Filed: December 1, 2025
Trial Date: Not Yet Set

JOINT STIPULATION OF DISMISSAL

Desiree Blair (“Plaintiff”) and AKD 3010 Royal, Inc. (“Defendant”) (collectively hereinafter referred to as “the Parties”), by and through their respective counsel of record, hereby stipulate and agree, and request that the Court enter its order approving this stipulation (“Stipulation”), based upon the following recitals:

Plaintiff agrees to hereby dismiss Class and PAGA claims without prejudice and all individual claims with prejudice and any claims that were or could have been asserted against Defendant in this action; and

WHEREAS, in exchange for Plaintiff’s dismissal of Defendant with prejudice, Defendant has agreed to waive any and all of its rights to seek damages against Plaintiff, including but not limited to any claim for recovery of attorneys’ fees and/or costs.

RECITALS OF DISMISSAL OF CLASS CLAIMS UNDER RULE 3.770, PAGA REPRESENTATIVE CLAIMS, AND INDIVIDUAL CLAIMS (ENTIRE ACTION)

1. **Procedural Posture.** On December 1, 2025, Plaintiff filed the instant action in Riverside County Superior Court as a class action on behalf of themselves and certain current and former non-exempt employees against Defendant AKD 3010 ROYAL INC., (“Defendant”), asserting various wage and hour claims, then on March 27, 2025 filed an amended complaint asserting claims for civil penalties on a representative basis under the California Private Attorneys General Act of 2004 ("PAGA").
2. **Purpose of This Stipulation.** The parties wish to resolve the litigation by dismissing without prejudice all representative PAGA claims, and all putative class and any possible subclass claims, and dismissing with prejudice all individual, non-representative claims, including any individual PAGA claims.
3. **Class-Certification Status and Notice.** No class has been certified, no class-certification motion has been filed or ruled upon, and no notice of pendency has issued. The parties request that the Court find that notice to putative class members is unnecessary under California Rule of Court 3.770(c).

1 4. **Court Approval and LWDA Notice.** Under Code of Civil Procedure section 581,
2 California Rule of Court 3.770, and Labor Code section 2699(1), the parties ask the Court
3 to approve this stipulation and enter the proposed order. Plaintiff will serve a copy of the
4 filed stipulation and any resulting order on the Labor and Workforce Development Agency
5 ("LWDA") on the same day the stipulation is filed.

6 5. **Attorneys' Fees and Costs.** Each party will bear its own attorneys' fees and costs.
7

8 **NOW, THEREFORE, FOR GOOD AND VALUABLE CONSIDERATION,**
9 **RECEIPT OF WHICH IS ACKNOWLEDGED BY THE PARTIES, THE PARTIES**
10 **HERETO STIPULATE AS FOLLOWS:**

- 11 1. Representative PAGA claims are dismissed without prejudice.
- 12 2. All putative class and subclass claims are dismissed without prejudice.
- 13 3. All individual, non-representative claims—including any individual PAGA claims—
14 are dismissed with prejudice.
- 15 4. Because no class has been certified and no notice of pendency has been issued, notice
16 to putative class members is unnecessary under California Rule of Court 3.770(c).
- 17 5. No causes of action will remain pending after entry of this order.
- 18 6. Each party will bear its own attorneys' fees and costs.
- 19 7. Plaintiff will serve the LWDA with this stipulation and any resulting order on the
20 same day this stipulation is filed.

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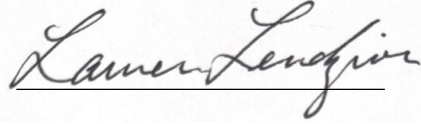
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1 8. The Clerk is directed to enter the dismissals pursuant to Code of Civil Procedure
2 section 581d and close the case.
3

4 Dated: April 2, 2026

WILSHIRE LAW FIRM, PLC

5
6 By:



7 THIAGO M. COELHO
8 LAUREN LENDZION
9 JESSE CHEN
10 **Attorneys for Plaintiff**
11 DESIREE BLAIR

12 Dated: April 2, 2026

COLLINS & KHAN LLP

13 By: /s/ Azim Khanmohamed (electronically authorized)

14 AZIM KHANMOHAMED
15 MARC A. COLLINS
16 R. MICHAEL COLLUM
17 **Attorneys for Defendant**
18 AKD 3010 ROYAL, INC.
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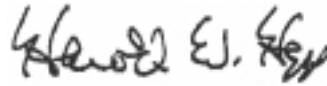
PROPOSED ORDER

Good cause appearing, the Court orders:

1. Representative PAGA claims are dismissed without prejudice.
2. Putative class and subclass claims are dismissed without prejudice.
3. Individual, non-representative claims—including any individual PAGA claims—are dismissed with prejudice.
4. Notice to putative class members is unnecessary under California Rule of Court 3.770(c).
5. Each party will bear its own attorneys' fees and costs.
6. Plaintiff shall serve this order on the LWDA within ten (10) days of its entry.
7. The Clerk is directed to enter dismissal pursuant to Code of Civil Procedure section 581d and close the case.

IT IS SO ORDERED

Dated: April 27, 2026



The Honorable Harold Hopp
Judge of the Superior Court