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JAMIE BARRON on behalf of
all aggrieved employees, and the State
of California as a Private Attorneys General

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Attorneys for Defendant,
GENEVA FINANCIAL, LLC

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES**

JAMIE BARRON, an individual, on behalf of all
aggrieved employees, and the State of California
as a Private Attorneys General,

Plaintiff,

v.

GENEVA FINANCIAL LLC, an Arizona limited
liability company, and DOES 1-50, inclusive,

Defendant.

Case No. 22STCV33032

Assigned for all purposes to:
Hon. Stephen P. Pfahler, Dept. 68

**STIPULATION FOR DISMISSAL OF
REPRESENTATIVE CLAIMS WITHOUT
PREJUDICE AND DISMISSAL OF
INDIVIDUAL CLAIMS WITH PREJUDICE;
[PROPOSED] ORDER**

Action Filed: October 7, 2022
Trial Date: October 21, 2024

FILED
Superior Court of California
County of Los Angeles

08/12/2024

David W. Slayton, Executive Officer / Clerk of Court

By: A. Williams Deputy

1 Plaintiff Jaime Barron (“Plaintiff”) and Defendant Geneva Financial, LLC (“Defendant”)
2 (together, the “Parties”), by and through their respective counsel of record, hereby submit a joint
3 stipulation for an Order dismissing *without* prejudice Plaintiff’s representative claims asserted against
4 Defendant pursuant to the Private Attorneys General Act, Cal. Labor Code § 2698 *et seq.* (“PAGA”),
5 and dismissing *with* prejudice Plaintiff’s individual claims, resulting in a dismissal of the above-
6 captioned action in its entirety. The Parties stipulate – and Plaintiff’s counsel attests, pursuant to the
7 Declaration of Nazo Koulloukian attached hereto as **Exhibit A** – as follows:

8 WHEREAS, on October 7, 2022, Plaintiff, through his counsel of record, filed the above-
9 captioned PAGA representative action on behalf of himself and other similarly situated employees in the
10 state of California who worked for Defendant and who were allegedly misclassified as exempt rather
11 than hourly, non-exempt employees (the “Aggrieved Employees”), alleging various PAGA claims on
12 behalf of the Aggrieved Employees (the “Action”);

13 WHEREAS, following the filing of the Complaint, the Parties engaged in informal discovery and
14 settlement negotiations, including as to the potential size of the Aggrieved Employee population, the
15 merits of Plaintiff’s PAGA allegations as to himself, and the merits of Plaintiff’s PAGA allegations as to
16 the other Aggrieved Employees;

17 WHEREAS, counsel for the Parties have conferred extensively and agreed that in exchange for
18 Plaintiff’s voluntary dismissal of the Complaint against Defendant *with* prejudice on an individual basis,
19 and *without* prejudice as to the representative claims, Defendant will pay Plaintiff a confidential
20 settlement amount;

21 WHEREAS, the Parties’ settlement does not purport to affect the rights of the public or any
22 Aggrieved Employees aside from Plaintiff;

23 WHEREAS, no compensation is being paid to Plaintiff, Plaintiff’s counsel, or any other counsel
24 for dismissal of Plaintiff’s representative PAGA claims, and the consideration paid is solely for
25 settlement of Plaintiff’s individual claims;

26 WHEREAS, because the Parties have not issued a notice of the pendency of this Action to any
27 other Aggrieved Employee, and the Parties are not aware of any publicity associated with this Action,
28 the Parties do not believe that any Aggrieved Employees have delayed asserting claims against
29 Defendant as a result of the filing of the Complaint, and as such, the claims of the Aggrieved Employees
30 were not tolled during the pendency of this Action;

1 WHEREAS, pursuant to California Rule of Court 3.770(c), notice of the voluntary dismissal of
2 the Complaint to the other Aggrieved Employees shall not be necessary because the dismissal will not
3 prejudice any of the other Aggrieved Employees, and shall only be with prejudice as to Plaintiff; and

4 WHEREAS, pursuant to Code of Civil Procedure section 664.6, the Court may retain jurisdiction
5 over this matter to enforce the settlement of Plaintiff's individual claims against Defendant until the
6 terms of the settlement are performed.

7 NOW, THEREFORE, the Parties, by and through their respective counsel of record, stipulate
8 and agree for the Court to enter an Order as follows:

9 1. Plaintiff's claims for penalties pursuant to the Private Attorneys General Act in the
10 above-captioned action against Defendant are dismissed without prejudice as to the putative aggrieved
11 employees, and with prejudice as to Plaintiff, resulting in dismissal of the action in its entirety;

12 2. Each Party shall bear its own attorneys' fees and costs incurred in connection with the
13 above-captioned action, as provided for in the confidential settlement agreement executed by the Parties;

14 3. Plaintiff's counsel shall notify the Labor and Workforce Development Agency of the
15 Court's Order, but no notice shall otherwise be required to the putative aggrieved employees; and

16 4. The Court shall retain jurisdiction over this matter pursuant to Code of Civil Procedure
17 section 664.6 to enforce the settlement of Plaintiff's individual claims against Defendant until the terms
18 of the settlement are performed.

19 IT IS SO STIPULATED.

20 Dated: July 30, 2024

KOUL LAW FIRM

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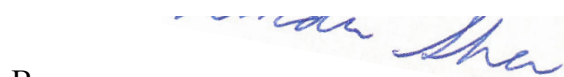
22 By _____

23 Nazo Koulloukian
24 Hilary Sylvia

25 Attorneys for Plaintiff
26 JAMIE BARRON

27 Dated: July 30, 2024

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

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29 By _____

30 Samantha D. Hardy
31 Linda Z. Shen

32 Attorneys for Defendant
GENEVA FINANCIAL, LLC

EXHIBIT A

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1. I am the attorney of record for Plaintiff Jaime Barron (“Plaintiff”) in the above-captioned action (the “Action”). The information stated herein is made based on my own knowledge, except where stated to be based on information and belief. If called upon to testify, I could and would competently testify to the matters stated herein.

3. I filed the above-captioned PAGA representative action on behalf of Plaintiff and other similarly situated employees in the state of California who worked for Defendant and who were allegedly misclassified as exempt rather than hourly, non-exempt employees (the “Aggrieved Employees”) on October 7, 2022, where the Complaint alleged various PAGA claims on behalf of the Aggrieved Employees.

5. Counsel for the Parties have conferred extensively and agreed that in exchange for Plaintiff's voluntary dismissal of the Complaint against Defendant *with* prejudice on an individual basis, and *without* prejudice as to the representative claims, Defendant will pay Plaintiff a confidential settlement amount.

7. No compensation is being paid to Plaintiff, myself, my law firm, or any other counsel for dismissal of Plaintiff's representative PAGA claims. The consideration paid is solely for settlement of Plaintiff's individual claims. While dismissal of Plaintiff's claims is with prejudice, the Parties have stipulated that dismissal of the representative PAGA claims are made without prejudice to the rights of any Aggrieved Employee aside from Plaintiff.

DECLARATION OF NAZO KOULLOUKIAN

1 Parties do not believe that any Aggrieved Employees have delayed asserting claims against Defendant as
2 a result of the filing of the Complaint. As such, the claims of the Aggrieved Employees were not tolled
3 during the pendency of this Action.

4 9. Pursuant to California Rule of Court 3.770(c), notice of the voluntary dismissal of the
5 Complaint to the other Aggrieved Employees shall not be necessary because the dismissal will not
6 prejudice any of the other Aggrieved Employees, and shall only be with prejudice as to Plaintiff.

7 10. Plaintiff requests that pursuant to Code of Civil Procedure section 664.6, the Court retain
8 jurisdiction over this matter to enforce the settlement of Plaintiff's individual claims against Defendant
9 until the terms of the settlement are performed.

10 I declare under penalty of perjury under the laws of the State of California that the information
11 contained in this entire Declaration is true and correct to the best of my knowledge.

12 Executed on June 3, 2024 at Los Angeles, California.

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16 Nazo Koulloukian
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[PROPOSED] ORDER

The Court, having received and reviewed the Parties' Stipulation for Dismissal of Representative Claims Without Prejudice and Dismissal of Individual Claims With Prejudice ("Stipulation") and the Declaration of Nazo Koulloukian attached thereto, and good cause appearing, hereby orders as follows:

1. Plaintiff's claims for penalties pursuant to the Private Attorneys General Act in the above-captioned action against Defendant are dismissed without prejudice as to the putative aggrieved employees, and with prejudice as to Plaintiff, resulting in dismissal of the action in its entirety;

2. Each Party shall bear its own attorneys' fees and costs incurred in connection with the above-captioned action, as provided for in the confidential settlement agreement executed by the Parties;

3. Plaintiff's counsel shall notify the Labor and Workforce Development Agency of this Order, but no notice shall otherwise be required to the putative aggrieved employees; and

4. The Court shall retain jurisdiction over this matter pursuant to Code of Civil Procedure section 664.6 to enforce the settlement of Plaintiff's individual claims against Defendant until the terms of the settlement are performed.

IT IS SO ORDERED.

Dated: 8-12-2024



A handwritten signature in black ink, appearing to read "Stephen P. Pfahler", followed by a horizontal line.

Stephen P. Pfahler / Judge
HON. STEPHEN P. PFAHLER
Judge of the Superior Court

PROOF OF SERVICE
Jamie Barron v. Geneva Financial, LLC
22STCV33032

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of Los Angeles, State of California. My business address is 501 West Broadway, 18th Floor, San Diego, CA 92101-3598.

On July 30, 2024, I served the following document(s) described as

**STIPULATION FOR DISMISSAL OF REPRESENTATIVE CLAIMS WITHOUT
PREJUDICE AND DISMISSAL OF INDIVIDUAL CLAIMS WITH PREJUDICE;
[PROPOSED] ORDER**

on the interested parties in this action as follows:

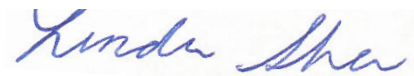
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3435 Wilshire Blvd., Suite 1710
Los Angeles, CA 90010

Attorneys for Plaintiff,
JAMIE BARRON

BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the document(s) to be sent from e-mail address lshen@sheppardmullin.com to the persons at the e-mail addresses listed above. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

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

Executed on July 30, 2024, at Los Angeles, California.



Linda Shen