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Attorneys for Plaintiff Mercedes Cervantes, 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 RIVERSIDE**

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

Plaintiff,

v.

PLAN-IT LIFE, INC., a California
corporation, and DOES 1 through 10,
inclusive,

Defendants.

CASE NO: CVRI2205519

Assigned to the Hon. Harold Hopp, Dept. 1

**PLAINTIFF’S REQUEST FOR DISMISSAL
OF REPRESENTATIVE ACTION;
~~PROPOSED~~ ORDER**

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

Complaint Filed: December 20, 2022

1 **REQUEST FOR DISMISSAL**

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

6 Dated: September 11, 2024

Respectfully submitted,
GAINES & GAINES, APLC

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8 By:

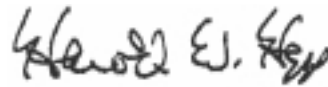


DANIEL F. GAINES
Attorneys for Plaintiff

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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 is dismissed WITHOUT PREJUDICE as to the representative action claims.
15 This dismissal does not extend to or otherwise affect the ability of an aggrieved employee to bring
16 individual and/or representative claims against the Defendant for any alleged violations of the Labor
17 Code.

18
19 Dated: September 12, 2024



JUDGE OF THE SUPERIOR COURT
Honorable Harold W. Hopp