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Attorneys for Plaintiffs Dayvon Sinclair,  
Nyighyell Anthony, Victor Proctor, and  
Victor Proctor, Jr., on behalf of themselves  
and all “aggrieved employees” pursuant to  
Labor Code § 2698 *et seq.*

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

DAYVON SINCLAIR, NYIGHYELL  
ANTHONY, VICTOR PROCTOR, VICTOR  
PROCTOR, JR., on behalf of themselves and  
all “aggrieved employees” pursuant to Labor  
Code § 2698 *et seq.*,

Plaintiffs,

v.

GLOBAL ALLIANCE PROTECTION, a  
California corporation, and DOES 1 through  
10, inclusive,

Defendants.

CASE NO: 22AVCV01004

*Assigned to the Honorable Daniel L. Alexander,  
Dept. A15*

**STIPULATION AND [PROPOSED] ORDER  
DISMISSING REPRESENTATIVE  
PRIVATE ATTORNEYS GENERAL ACT  
ACTION**

**[CRC 3.769, Labor Code § 2698 *et seq.*]**

[Filed Concurrently with Declaration of Evan S.  
Gaines]

*Complaint Filed: December 2, 2022*

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WHEREAS, the Parties attended a full day private mediation on January 7, 2025, and although the matter did not resolve at that time, the Parties continued settlement discussions in the months thereafter; (Gaines Decl., ¶ 3);

WHEREAS, the Parties have negotiated a settlement of Plaintiffs’ individual claims only, and the PAGA claims will be dismissed *without* prejudice (the “Settlement Agreements”) (Gaines Decl., ¶ 5);

WHEREAS, concurrent to the filing of this Stipulation, the Parties have submitted the Settlement Agreements to the Labor and Workforce Development Agency in compliance with Labor Code section 2699(1)(2) (Gaines Decl. ¶ 7).

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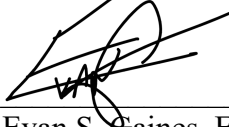
1 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the Parties hereto and  
2 through their respective attorneys of record that Plaintiffs' individual claims shall be dismissed with  
3 prejudice, the claims of all allegedly aggrieved employees shall be dismissed without prejudice, and  
4 the Court shall retain jurisdiction pursuant to Code of Civil Procedure Section 664.6 with respect to  
5 all matters related to the consummation of the settlement, including to enforce the Settlement.

6 **IT IS SO STIPULATED.**

7 Dated: June 27, 2025

8 For Plaintiff:

9 GAINES LAW CORPORATION

10 By:   
11 Evan S. Gaines, Esq.

For Defendant Global Alliance Protection

PALMIERI, TYLER, WIENER, WILHELM  
& WALDRON LLP

12 By:   
13 Erin K. Oyama  
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**ORDER**

The Court, having reviewed the Parties' stipulation and any and all supporting papers, hereby  
ORDERS that:

1. The action is hereby DISMISSED WITH PREJUDICE as to Plaintiffs Dayvon Sinclair, Nyighyell Anthony, Victor Proctor, and Victor Proctor, Jr.'s individual claims, and DISMISSED WITHOUT PREJUDICE as to claims under PAGA asserted on behalf of all allegedly aggrieved employees; and

2. The Court shall retain jurisdiction pursuant to Code of Civil Procedure Section 664.6 with respect to all matters related to the consummation of the settlement, including to enforce the Settlement.

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_

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JUDGE OF THE SUPERIOR COURT

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\_\_\_\_\_ (For messenger) my business address is:

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1900 Main Street, Suite 700, Irvine, CA 92614  
CC: Shirley Taylor, [staylor@ptwww.com](mailto:staylor@ptwww.com)

(BY x U.S. MAIL/ BY ☐ CERTIFIED MAIL, RETURN RECEIPT REQUESTED) The sealed envelope was mailed with postage thereon fully prepaid. I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. It is deposited with United States postal service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

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](http://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

EVANS GAINES P.

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EVAN S. GAINES, ESQ.