

1 DANIEL F. GAINES, ESQ. SBN 251488
daniel@gaineslawfirm.com
2 ALEX P. KATOFISKY, ESQ. SBN 202754
alex@gaineslawfirm.com
3 **GAINES & GAINES, APLC**
4 4550 East Thousand Oaks Boulevard, Suite 100
Westlake Village, CA 91362
Telephone: (818) 703-8985
5 Facsimile: (818) 703-8984

6 Attorneys for Plaintiff Kali Campbell, on behalf of herself and all “aggrieved employees” pursuant
7 to Labor Code § 2698 *et seq.*

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF STANISLAUS**

10 KALI CAMPBELL, on behalf of herself and
11 all “aggrieved employees” pursuant to Labor
Code § 2698 *et seq.*,

12 Plaintiff,

13 v.

14 LAGAN, INC., a California corporation, and
15 DOES 1 through 10, inclusive,

16 Defendants.
17
18
19
20
21
22
23
24
25
26
27
28

CASE NO: CV-22-005981

Assigned to the Hon. Stacey Speiller, Dept. 2

**PLAINTIFF’S REQUEST FOR
DISMISSAL; [PROPOSED] ORDER**

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

Complaint Filed: December 8, 2022

1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8

Dated: October 23, 2024

By: Daniel F. Gaines
DANIEL F. GAINES
Attorneys for Plaintiff

Based on the Request for Dismissal and the concurrently-filed Declaration of Daniel F. Gaines, it is hereby ORDERED that this action is dismissed WITH PREJUDICE as to Plaintiff's individual claims and WITHOUT PREJUDICE as to the PAGA representative claims.

Dated: _____

JUDGE OF THE SUPERIOR COURT

1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8

_____ (For messenger) my business address is:

Chris Alvarez, Esq.
calvarez@fisherphillips.com
Alden Parker, Esq.
aparker@fisherphillips.com
Corina Johnson, Esq.
cjohnson@fisherphillips.com
FISHER & PHILLIPS LLP
621 Capitol Mall, Suite 1400
Sacramento, CA 95814
CC: Vicki Rathke
vrathke@fisherphillips.com
Alicia Malerbi
amalerbi@fisherphillips.com
Nancy Galeno
ngaleno@fisherphillips.com

____ (BY FEDERAL EXPRESS OR OTHER OVERNIGHT SERVICE) I deposited the sealed envelope in a box or other facility regularly maintained by the express service carrier or delivered the sealed envelope to an authorized carrier or driver authorized by the express carrier to receive documents.

 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) in accordance with the procedure imposed by the LWDA.

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

Executed on October 23, 2024, at Westlake Village, California.

Amelia Booth

AMELIA BOOTH