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Attorneys for Plaintiff Kali Campbell, 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 STANISLAUS

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

Plaintiff,

v.

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

Defendants.

CASE NO: CV-22-005981

Assigned to the Hon. Stacey Speiller, Dept. 22

**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 **REQUEST FOR DISMISSAL**

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

6 Dated: October 23, 2024

Respectfully submitted,
GAINES & GAINES, APLC

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8 By: *Daniel F. Gaines*
9 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 WITHOUT PREJUDICE as to the PAGA representative claims.

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16 Dated: 10/28/24


JUDGE OF THE SUPERIOR COURT

18 Stacy P. Speiller

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_____ (For messenger) my business address is:

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____ (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