

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 Ryan Glover, on behalf of himself and all “aggrieved employees” pursuant to
Labor Code § 2698 *et seq.*

7
8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF SAN BERNARDINO**

10 RYAN GLOVER, on behalf of himself and all
11 “aggrieved employees” pursuant to Labor
Code § 2698 *et seq.*,

12 Plaintiff,

13 v.

14 WATCHMEN, INC., a California corporation,
15 d/b/a WATCHMEN PATROL, and DOES 1
through 10, inclusive,

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

Case No. CIVSB2307197

Assigned to the Hon. Winston Keh, Dept. VII

**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: March 28, 2023

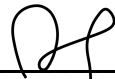
1 **REQUEST FOR DISMISSAL**

2 Based on the facts set forth in the concurrently-filed Declaration of Daniel F. Gaines, Plaintiff
3 RYAN GLOVER ("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: June 11, 2024

Respectfully submitted,
GAINES & GAINES, APLC

7
8 By:



DANIEL F. GAINES
Attorneys for Plaintiff

9
10
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.

15
16 Dated: _____

JUDGE OF THE SUPERIOR COURT

1 **PROOF OF SERVICE AND CERTIFICATION**

2 I am employed in the County of Ventura, State of California. I am over the age of 18 and not a party to the
3 within action; my business address is 4550 East Thousand Oaks Boulevard, Suite 100, Westlake Village, CA 91362.

4 _____ (For messenger) my business address is:

5 On May 10, 2024, I served the foregoing document described as **PLAINTIFF'S REQUEST FOR**
6 **DISMISSAL; [PROPOSED] ORDER** on the interested parties in this action by placing a true copy thereof enclosed in
7 sealed envelopes addressed as follows:

8 **Jamie R. Gross, Esq.- jgross@fisherphillips.com**
9 **Lauren Bushman, Esq.- lbushman@fisherphillips.com**
10 **Michael Lynn, Esq.- mfilio@fisherphillips.com**
11 **FISHER & PHILLIPS LLP**
12 **4747 Executive Drive, Suite 1000**
13 **San Diego, California 92121**
14 **Cc: aford@fisherphillips.com**

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

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

24 X (BY ELECTRONIC SERVICE) The above-stated document was submitted for service by electronic
25 transmission on the counsel of record listed above.

26 X (UPLOADED TO LWDA WEB PORTAL) I caused the above-described documents to be delivered to the Labor
27 & Workforce Development Agency via online process at the PAGA Filing website (www.dir.ca.gov)
28 in accordance with the procedure imposed by the LWDA.

I certify that the above document was printed on recycled paper.

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

Executed on June 11, 2024, at Westlake Village, California.

22 
23 _____
24 AMELIA BOOTH