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Attorneys for Plaintiff Bryan Cioffi, on behalf of himself and all “aggrieved employees” pursuant to Labor Code § 2698 *et seq.*

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

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

Plaintiff,

v.

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

Defendants.

Case No.: 23CHCV01426

*Assigned to the Hon. Judge David B. Gelfound,
Dept. F49*

**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: May 15, 2023

1 **REQUEST FOR DISMISSAL**

2 Based on the facts set forth in the concurrently-filed Declaration of Daniel F. Gaines, Plaintiff
3 BRYAN CIOFFI ("Plaintiff") hereby requests that the Court enter a dismissal of this action **WITH**
4 **PREJUDICE** as to Plaintiff's individual claims including Plaintiff's individual claims for PAGA
5 civil penalties and **WITHOUT PREJUDICE** as to the State of California and any representative
6 claims for PAGA civil penalties.

7 Dated: April 23, 2024

Respectfully submitted,
GAINES & GAINES, APLC

8
9 By: Daniel F. Gaines
10 DANIEL F. GAINES
11 Attorneys for Plaintiff

12 **[PROPOSED] ORDER**

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

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18 Dated: _____

JUDGE OF THE SUPERIOR COURT

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_____ (For messenger) my business address is:

**E. Sean McLoughlin, Esq.
Hill, Farrer & Burrill LLP
One California Plaza
300 S Grand Ave, 37th Floor
Los Angeles, CA 90071**

Executed on April 25, 2024, at Westlake Village, California.

JEREMY REYES