

ATTORNEY OR PARTY WITHOUT ATTORNEY NAME: Daniel F. Gaines, Esq. FIRM NAME: Gaines & Gaines, APLC STREET ADDRESS: 4550 East Thousand Oaks Blvd., Suite 100 CITY: Westlake Village STATE: CA ZIP CODE: 91362 TELEPHONE NO.: 818-703-8985 FAX NO.: 818-703-8984 EMAIL ADDRESS: office@gaineslawfirm.com ATTORNEY FOR (name): Plaintiffs, Michele Watley, Darlene Villela, and Rodrigo Balderas SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES STREET ADDRESS: 312 North Spring Street MAILING ADDRESS: 312 North Spring Street CITY AND ZIP CODE: Los Angeles, 90012 BRANCH NAME: Spring Street Courthouse	FOR COURT USE ONLY
PLAINTIFF/PETITIONER: MICHELE WATLEY, et al. DEFENDANT/RESPONDENT: GOOD GUARD SECURITY, INC., a California corporation, et al.	
NOTICE OF ENTRY OF JUDGMENT OR ORDER (Check one): ☒ UNLIMITED CASE (Amount demanded exceeded \$35,000) ☐ LIMITED CASE (Amount demanded was \$35,000 or less)	CASE NUMBER: 23STCV16123

TO ALL PARTIES :

1. A judgment, decree, or order was entered in this action on (date): April 6, 2026
2. A copy of the judgment, decree, or order is attached to this notice.

Date: April 7, 2026

Daniel F. Gaines, Esq.

(TYPE OR PRINT NAME OF ☒ ATTORNEY ☐ PARTY WITHOUT ATTORNEY)

 Daniel F. Gaines
 (SIGNATURE)

PLAINTIFF/PETITIONER: MICHELE WATLEY, et al.
 DEFENDANT/RESPONDENT: GOOD GUARD SECURITY, INC., a California corporation, et al.

CASE NUMBER:
 23STCV16123

**PROOF OF SERVICE BY FIRST-CLASS MAIL
 NOTICE OF ENTRY OF JUDGMENT OR ORDER**

(NOTE: You cannot serve the Notice of Entry of Judgment or Order if you are a party in the action. The person who served the notice must complete this proof of service.)

1. I am at least 18 years old and **not a party to this action**. I am a resident of or employed in the county where the mailing took place, and my residence or business address is (*specify*):

PLEASE SEE ATTACHED PROOF OF SERVICE

2. I served a copy of the *Notice of Entry of Judgment or Order* by enclosing it in a sealed envelope with postage fully prepaid and (*check one*):
- a. ☐ deposited the sealed envelope with the United States Postal Service.
- b. ☐ placed the sealed envelope for collection and processing for mailing, following this business's usual practices, with which I am readily familiar. On the same day correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service.
3. The *Notice of Entry of Judgment or Order* was mailed:
- a. on (*date*):
- b. from (*city and state*):

4. The envelope was addressed and mailed as follows:

a. Name of person served:

Street address:

City:

State and zip code:

c. Name of person served:

Street address:

City:

State and zip code:

b. Name of person served:

Street address:

City:

State and zip code:

d. Name of person served:

Street address:

City:

State and zip code:

☐ Names and addresses of additional persons served are attached. (*You may use form POS-030(P).*)

5. Number of pages attached:

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

Date:

PLEASE SEE ATTACHED PROOF OF SERVICE

(TYPE OR PRINT NAME OF DECLARANT)

(SIGNATURE OF DECLARANT)

Electronically Received 03/24/2026 01:16 PM

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

5 Attorneys for Plaintiffs Michele Watley, Darlene Villela, and Rodrigo Balderas, on behalf of
6 themselves, all others similarly situated, the general public, and all “aggrieved employees” pursuant
to Labor Code § 2698 et seq.

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

9 MICHELE WATLEY, on behalf of herself and
10 all others similarly situated and on behalf of
the general public,

11 Plaintiff,

12 v.

13 GOOD GUARD SECURITY, INC., a
14 California corporation; HALMAND
TABIBZADA, an individual; SHAWN
15 HELMANDI, an individual, and DOES 1
through 10, inclusive,

16 Defendants.
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CASE NO: 23STCV16123

Assigned to the Hon. Elaine Lu, Dept. SS-9

**PLAINTIFFS’ REQUEST FOR
DISMISSAL OF CLASS AND
REPRESENTATIVE ACTION;
[PROPOSED] ORDER**

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

Complaint Filed: July 11, 2023

FAC Filed: April 10, 2024

FILED
Superior Court of California
County of Los Angeles

04/06/2026

David W. Slayton, Executive Officer / Clerk of Court

By: P. Herrera Deputy

1 **REQUEST FOR DISMISSAL**

2 Based on the facts set forth in the concurrently-filed Declaration of Daniel F. Gaines, Plaintiffs
3 Michele Watley, Darlene Villela, and Rodrigo Balderas (collectively, "Plaintiffs") hereby request that
4 the Court, pursuant to California Rules of Court, rule 3.770, dismiss this action **WITH PREJUDICE**
5 as to Plaintiffs' individual claims and **WITHOUT PREJUDICE** as to the class and representative
6 action claims.

7 Dated: March 24, 2026

Respectfully submitted,
GAINES & GAINES, APLC

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9 By: /s/ Daniel F. Gaines
10 DANIEL F. GAINES
11 Attorneys for Plaintiffs

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 Plaintiffs'
15 individual claims and WITHOUT PREJUDICE as to the class and representative action claims.

16 The Court finds that dismissal of the class and representative claims without prejudice will
17 not prejudice putative class members.

18 Within ten (10) calendar days after entry of this Order, Plaintiffs' counsel shall provide notice
19 by email to all putative class members who previously received the original email notice regarding
20 this action. The notice shall inform recipients that the action has been dismissed and is no longer
21 pending. Such notice shall be sent to the same email addresses used for the original notice.

22 Plaintiff's Counsel is ordered to file and serve by no later than 5/5/26 a declaration
23 attaching the email notice and attesting that the email notice has been distributed to all
24 putative class members who previously received the original email. A Non-Appearance Case
Review re filing of Plaintiff's Declaration is set for 5/12/26, at 8:30 am in Department 9.

25 Plaintiff is to give formal notice of this order to all parties and file proof of service of
26 such within five court days.

27 04/06/2026



Elaine Lu
Elaine Lu / Judge

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_____ (For messenger) my business address is:

Larry Haakon Clough, Esq.
lhclough@lhcllegal.com
Law Offices of Larry Clough
21757 Devonshire Street, Suite 2
Chatsworth, CA 91311

____ (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.

Executed on April 7, 2026, at Westlake Village, California.

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PROOF OF SERVICE