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8 Attorneys for Plaintiff Jacqueline Martinez,
9 on behalf of herself and all “aggrieved employees”
10 pursuant to Labor Code § 2698 *et seq.*

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **FOR THE COUNTY OF LOS ANGELES**

13 JACQUELINE MARTINEZ, on behalf of
14 herself and all “aggrieved employees” pursuant
15 to Labor Code § 2698 *et seq.*,

16 Plaintiffs,

17 v.

18 CATALINA’S SUPERMARKET, a California
19 corporation, and DOES 1 through 10,
20 inclusive,

21 Defendants.

CASE NO: 23STCV18357

Assigned to the Hon. Mel Red Recana, Dept. 45

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

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

Complaint Filed: August 2, 2023

1 **REQUEST FOR DISMISSAL**

2 Based on the facts set forth in the concurrently-filed Declaration of Evan S Gaines, Plaintiff
3 Jacqueline Martinez (“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: March 1, 2024

7 Respectfully submitted,
8 GAINES LAW CORPORATION

9 By: 

10 EVAN S. GAINES
11 Attorneys for Plaintiff

12 **[PROPOSED] ORDER**

13 Based on the Request for Dismissal and the concurrently-filed Declaration of Evan S. Gaines,
14 it is hereby ORDERED that this action is dismissed WITH PREJUDICE as to Plaintiff’s individual
15 claims and WITHOUT PREJUDICE as to the PAGA representative claims.

16 Dated: _____

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18 JUDGE OF THE SUPERIOR COURT
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_____ (For messenger) my business address is:

Marija Kristich Decker, Esq.
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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 March 1, 2024, at Westlake Village, California.



EVAN GAINES