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**Electronically FILED by
Superior Court of California,
County of Los Angeles
7/20/2026 3:53 PM
David W. Slayton,
Executive Officer/Clerk of Court,
By J. Gnade, Deputy Clerk**

Attorneys for Plaintiff Benito Juarez

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

BENITO JUAREZ, individually, and on
behalf of all others similarly situated,

Plaintiff,

vs.

ASTRO PAK CORPORATION, a California
corporation; ASTRO PAK, LLC, a limited
liability company; and DOES 1 through 10,
inclusive,

Defendants

Case No.: 25STCV38144

*[Assigned for all purposes to Hon. Theresa M.
Traber, Dept. 1]*

**REQUEST FOR DISMISSAL OF
ENTIRE ACTION**

[Filed concurrently with [Proposed] Order]

Action Filed: December 22, 2025
Trial Date: Not Set

REQUEST FOR DISMISSAL

1. Plaintiff Benito Juarez (“Plaintiff”) submits this Request for Dismissal of Entire Action, based on the following facts.

2. On December 22, 2025, Plaintiff initiated the instant action by filing a class action complaint against Defendants Astro Pak Corporation and Astro Pak, LLC (“Defendants”) (Plaintiff and Defendants are hereinafter collectively referred to as the “Parties”), alleging various violations of the Labor Code and Business and Professions Code.

3. On February 25, 2026, Plaintiff filed the First Amended Class Action and Representative Action Complaint, adding a cause of action under the California Private Attorneys General Act of 2004 (“PAGA”).

4. Thereafter, due to the existence of an arbitration agreement Plaintiff signed, the Parties submitted a stipulation to dismiss the class claims without prejudice, to submit Plaintiff’s individual claims to arbitration, and to stay the representative PAGA claim pending the completion of arbitration.

5. On March 18, 2026, the Court approved the stipulation, dismissed the class claims in this action, and ordered Plaintiff’s individual claims to arbitration, thereby leaving only Plaintiff’s representative PAGA claim pending before this Court.

6. Based on Plaintiff’s further investigation and evaluation of the claims, Plaintiff has elected to resolve his individual claims and not to pursue the remaining representative PAGA claim in this action.

7. Because Plaintiff’s individual claims were previously ordered to arbitration and have now been resolved, and because Plaintiff no longer seeks to pursue the remaining representative PAGA claim in this action, Plaintiff respectfully requests that the Court dismiss this action in its entirety.

8. Specifically, Plaintiff requests that the Court enter an order: (a) dismissing with prejudice Plaintiff’s individual claims; and (b) dismissing without prejudice Plaintiff’s PAGA claim.

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DATE: July 20, 2026

Respectfully submitted,

MOON LAW GROUP, PC

By: 
Kane Moon
Allen Feghali
Julie Oh
Attorneys for Plaintiff

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA)
3) ss
4 COUNTY OF LOS ANGELES)

5 I am employed in the county of Los Angeles, State of California. I am over the age of 18
6 and not a party to the within action; my business address is 725 S Figueroa St., 31st Floor, Los
7 Angeles, California 90017. On **July 20, 2026**, I served the foregoing document described as:

8 **REQUEST FOR DISMISSAL OF ENTIRE ACTION; [PROPOSED] ORDER**

9 X by placing ___ the original X a true copy thereof enclosed in sealed envelope(s)
10 addressed as follows:

11 **Alison L. Lynch (SBN 240346)**
12 **Mehreen Mazhar (SBN 363872)**
13 **JACKSON LEWIS P.C.**
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19 **Attorneys for Defendants**
20 **ASTRO PAK CORPORATION and**
21 **ASTRO PAK, LLC**

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Attorneys for Plaintiff BENITO JUAREZ

16 **[X] BY E-MAIL:** I hereby certify that this document was served from Los Angeles, California, b e-
17 mail delivery on the parties listed herein at their most recent known e-mail address from e-mail
18 sdelgado@moonlawgroup.com pursuant to California Rules of Court. I did not receive, within a
19 reasonable time after the transmission, any electronic message or other indication tha the
20 transmission was unsuccessful.

21 X (State) I declare under penalty of perjury under the laws of the State of California
22 that the above is true and correct.

23 Executed on **July 20, 2026**, at Los Angeles, California.

24 Steven Delgado
25 Name

26 /s/ Steven Delgado
27 Signature