



ZAKAY LAW GROUP
A PROFESSIONAL LAW CORPORATION

Client #27601

October 22, 2024

Labor & Workforce Development Agency
Attn. PAGA Administrator
1515 Clay Street, Ste. 801
Oakland, CA 94612
PAGA@dir.ca.gov
Via Online Submission

Case Name: *Griselda Duran v. EmployBridge Holding Company, et al.*
LWDA No. LWDA-CM-785152-20
Re: Notice of Abandonment of Claims

Dear Sir/Madam:

Please be advised that on or around August 29, 2024, the Claimant in the above referenced matter entered into a settlement agreement whereby she agreed to release the Defendants from all liability for her individual claims. The settlement and release are without prejudice as to the Aggrieved Employees but with prejudice as to the Claimant's ability to pursue her individual claim under PAGA. Therefore, this letter is intended to notify you of Claimant's abandonment of her PAGA claims. Enclosed is the Conformed Order for Dismissal of Entire Action.

If you have any questions or concerns, please do not hesitate to contact me at the above number and address.

Sincerely,

Shani O. Zakay
Attorney for Plaintiff

9/30/2024 10:59 AM

KERN COUNTY SUPERIOR COURT
10/07/2024BY Velazquez, Alejandra
DEPUTY**ZAKAY LAW GROUP, APLC**

Shani O. Zakay (State Bar #277924)
Jackland K. Hom (State Bar #324243)
Rachel N. Newman (State Bar #350826)
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Telephone: (619) 255-9047
shani@zakaylaw.com
jackland@zakaylaw.com
rachel@zakaylaw.com

JCL LAW FIRM, APC

Jean-Claude Lapuyade (State Bar #248676)
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Telephone: (619) 599-8292
jlapuyade@jcl-lawfirm.com

Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA**IN AND FOR THE COUNTY OF KERN**

GRISELDA DURAN, an individual, on behalf of
herself, and on behalf of all persons similarly
situated,

Plaintiff,

v.

EMPLOYBRIDGE HOLDING COMPANY, a
Delaware Corporation; EMPLOYBRIDGE, LLC
dba SELECT STAFFING, a California Limited
Liability Company; SELECT STAFFING, an
entity of unknown origin and type; REAL TIME
STAFFING SERVICES, LLC, a California
limited liability company; EMPLOYBRIDGE
OF DALLAS, INC., a Georgia Domestic Profit
Corporation; and DOES 4 through 50, inclusive,

Defendants.

Case No. BCV-20-101583

[Complaint Filed: July 9, 2020]

**[PROPOSED] ORDER FOR DISMISSAL
OF ENTIRE ACTION**

1 **[PROPOSED] ORDER**

2 The Court, having [REDACTED] considered the Declaration of Shani O. Zakay, Esq., and for good
3 cause appearing, hereby orders as follows:

4 **IT IS HEREBY ORDERED:**

- 5 1. Plaintiff's individual PAGA claim is dismissed, *with* Prejudice.
6 2. Plaintiff's representative PAGA claim is dismissed, *without* Prejudice.
7 3. Therefore, the action is dismissed in its entirety.
8 4. Each party to bear their own fees and costs.

9 **IT IS SO ORDERED.**

10
11 Dated: October 7, 2024


12 JUDGE OF THE SUPERIOR COURT

13 Signed: 10/7/2024 11:06 AM