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Attorneys for Plaintiff Mike Sanders, 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 SAN BERNARDINO

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

Plaintiff,

v.

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

Defendants.

CASE NO: CIVSB2318716

*Assigned to the Hon. Joseph T. Ortiz, Dept.
S17*

**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: August 11, 2023

1 **REQUEST FOR DISMISSAL**

2 Based on the facts set forth in the concurrently-filed Declaration of Daniel F. Gaines, Plaintiff
3 Mike Sanders ("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: January 31, 2024

Respectfully submitted,
GAINES & GAINES, APLC

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8 By:



DANIEL F. GAINES
Attorneys for Plaintiff

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11 **[PROPOSED] ORDER**

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

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16 Dated: _____

JUDGE OF THE SUPERIOR COURT

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_____ (For messenger) my business address is:

**Heather Stone, Esq.
Kendra Chavez, Esq.
Lagasse Branch Bell + Kinhead
4365 Executive Dr., Suite 950
San Diego, CA 92121**

Executed on January 31, 2024, at Westlake Village, California.

JEREMY REYES