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Attorneys for Plaintiff STEVEN ALEX SCHOOL

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF PLACER

STEVEN ALEX SCHOOL, individually, and on
behalf of all others similarly situated,

Plaintiff,

vs.

VENQUEST INVESTMENTS & PROPERTIES
LLC, a California Limited Liability Company;
and DOES 1 through 10, inclusive,

Defendants.

Case No.: S-CV-0050985

[Assigned for all purposes to Hon. Todd Irby,
Department 6]

**[PROPOSED] ORDER DISMISSING PAGA
CLAIM AGAINST DEFENDANT
WITHOUT PREJUDICE**

Complaint Filed: August 7, 2023
Trial: None Yet Set

1 **[PROPOSED] ORDER**

2

3 Having read and considered the Parties' joint application to dismiss Plaintiff STEVEN ALEX

4 SCHOOL's alleged claim for relief arising under the Labor Code Private Attorneys General Act of 2004,

5 Labor Code §2698, et seq. ("PAGA") against Defendant VENQUEST INVESTMENTS &

6 PROPERTIES LLC without prejudice, the supporting declaration of Lilit Tunyan and proof of submission

7 of the joint application and proposed order to the Labor and Workforce Development Agency and GOOD

8 CAUSE APPEARING, it is ORDERED as follows:

- 9 1. Plaintiff's alleged Claim for Relief arising under the Labor Code Private Attorneys General
- 10 Act of 2004, Labor Code §2698, et seq. ("PAGA") is dismissed without prejudice.
- 11 2. Because the notice of the pendency of the action has not been required to be provided to the
- 12 PAGA aggrieved employees, Plaintiff requests that the Court grant dismissal, without
- 13 prejudice, of Plaintiff's alleged PAGA claim without directing notice to PAGA aggrieved
- 14 employees. The requested dismissal will not prejudice them. California Rules of Court,
- 15 Rule 3.770(c).
- 16 3. This Court shall retain jurisdiction of this action under Code of Civil Procedure section
- 17 664.6 to enforce the terms of the individual settlement and release agreement entered
- 18 between the Parties until performance in full of the terms of the individual and settlement
- 19 release agreement.

20 **IT IS SO ORDERED.**

21

22 Dated: _____

23 _____
24 Hon. Todd Irby
25 JUDGE OF THE SUPERIOR COURT

1
2 **PROOF OF SERVICE**

3
4 STATE OF CALIFORNIA)
5) ss
6 COUNTY OF LOS ANGELES)

7 I am employed in the county of Los Angeles, State of California. I am over the age of 18
8 and not a party to the within action; my business address is 535 N Brand Blvd. Suite 285
9 Glendale, California 91203. On June 25, 2024, I served the foregoing document described as:

10 On the date indicated below, I served the document described as: **PROPOSED] ORDER**
11 **DISMISSING PAGA CLAIM AGAINST DEFENDANT WITHOUT PREJUDICE** on the
12 interested parties in this action by sending a true copy thereof to interested parties as follows and
13 as stated on the attached service list:

14 Alan Gene Novodor
15 novodor@msn.com
16 Thomas Bishop
17 tbishop@novodorlaw.com
18 Jessica Rangel
19 jessica@novodorlaw.com
20 **Law Offices of Alan G. Novodor**
21 11835 Olympic Blvd Ste 1125E
22 Los Angeles, CA 90064-5001
23 Phone: 310-479-9387
24 Fax: 310-479-9388

25 ***Attorneys for Defendant Venquest Investments & Properties LLC***

26 [✓] **BY E-MAIL:** I hereby certify that this document was served from Glendale, California,
27 by e-mail delivery on the parties listed herein at their most recent known e-mail address
28 or e-mail of record in this action.

[✓] **BY ELECTRONIC SERVICE:** Based on an agreement of the parties to accept electronic
service, I caused the documents to be sent to the persons at the electronic service addresses listed
above via electronic mail. I did not receive an error message.

I declare under penalty of perjury under the laws of the State of California that the
above is true and correct. Executed on June 25, 2024 at Glendale, California.

25 Lilit Tunyan
26 _____
27 Name

25 
26 _____
27 Signature