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Attorneys for Plaintiff Rigoberto Rodriguez-Gonzalez on behalf of himself and on behalf of all similarly situated individuals

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN JOAQUIN

RIGOBERTO RODRIGUEZ-GONZALEZ, on
behalf of himself and on behalf of all similarly
situated individuals,

Plaintiff,

v.

BOGDAN DELIVERY LLC, a Washington
limited liability company, and DOES 1 through
10, inclusive,

Defendants.

CASE NO: STK-CV-UOE-2023-8229

*Assigned to the Hon. George J. Abdallah,
Dept. 10A*

**PLAINTIFF'S REQUEST FOR
DISMISSAL OF CLASS AND
REPRESENTATIVE ACTION;
[PROPOSED] ORDER**

[Filed Concurrently]: Declaration of Daniel F.
Gaines in Support of Request for Dismissal of
Class and Representative Action]

Action Filed: August 3, 2023

1 **REQUEST FOR DISMISSAL**

2 Based on the facts set forth in the concurrently-filed Declaration of Daniel F. Gaines, Plaintiff
3 Rigoberto Rodriguez-Gonzalez 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 class and
5 representative action claims.

6 Dated: March 25, 2024

Respectfully submitted,
GAINES & GAINES, APLC

8 By:

9 
DANIEL F. GAINES
Attorneys for Plaintiff

10
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 class and representative action claims.

15
16 Dated: _____

JUDGE OF THE SUPERIOR COURT