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Attorneys for Plaintiffs Juan Rodriguez Jr., Luis Ruiz, John Locke, Billy Pierce, and Marvin Pena,
on behalf of themselves and all “aggrieved employees” pursuant to Labor Code § 2698 *et seq.*

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

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

Plaintiff,

v.

LAHHAM AUTOMOTIVE, INC., a California
corporation, and DOES 1 through 10,
inclusive,

Defendants.

CASE NO: STK-CV-UOE-2023-9779

*Assigned to the Hon. Erin Guy Castillo, Dept.
10B*

**PLAINTIFFS’ 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]

Complaint Filed: September 13, 2023
FAC Filed: May 23, 2024

1 **REQUEST FOR DISMISSAL**

2 Based on the facts set forth in the concurrently-filed Declaration of Daniel F. Gaines, Plaintiffs
3 Juan Rodriguez Jr., Luis Ruiz, John Locke, Billy Pierce, and Marvin Pena (collectively, "Plaintiffs")
4 hereby request that the Court enter a dismissal of this action **WITH PREJUDICE** as to Plaintiffs'
5 individual claims and dismissal **WITHOUT PREJUDICE** as to the class and representative action
6 claims.

7 Dated: December 10, 2024

Respectfully submitted,
GAINES & GAINES, APLC

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9 By: Daniel Gaines
10 DANIEL F. GAINES
11 Attorneys for Plaintiffs

12 **[PROPOSED] ORDER**

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

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18 Dated: _____

JUDGE OF THE SUPERIOR COURT

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_____ (For messenger) my business address is:

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 X (UPLOADED TO LWDA WEB PORTAL) I caused the above-described documents to be delivered to the Labor & Workforce Development Agency via online process at the PAGA Filing website (www.dir.ca.gov) in accordance with the procedure imposed by the LWDA.

Executed on December 10, 2024, at Westlake Village, California.

-3-

PLAINTIFFS' REQUEST FOR DISMISSAL OF CLASS AND REPRESENTATIVE ACTION; ORDER