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

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Attorneys for Defendant
ATLASSIAN US, INC.

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SANTA CLARA

SOFIA PANDELEA, individually, and on
behalf of herself and all “aggrieved
employees” pursuant to Labor Code § 2698 *et*
seq.,

Plaintiff,

v.

ATLASSIAN US, INC., a Delaware
corporation, and DOES 1 through 10,
inclusive,

Defendants.

Case No. 26CV492752

Assigned for all purposes to the Honorable Nahal
Iravani-Sani, Dept. 12

**STIPULATION AND [PROPOSED] ORDER
DISMISSING PLAINTIFF’S INDIVIDUAL
CLAIMS WITH PREJUDICE AND
REPRESENTATIVE PRIVATE
ATTORNEYS GENERAL ACT ACTION
WITHOUT PREJUDICE**

[Labor Code § 2698 *et seq.*]

[Filed Concurrently with Declaration of Evan S.
Gaines]

Complaint Filed: April 27, 2026

STIPULATION

WHEREAS, on April 27, 2026, Plaintiff SOFIA PANDELEA (“Plaintiff”), on behalf of herself and on behalf of all aggrieved employees filed an individual and representative complaint against Defendant ATLISSIAN US, INC., a Delaware corporation (“Defendant”) (collectively, the “Parties”), pursuant to the Labor Code Private Attorneys General Act of 2004 (“PAGA”), Labor Code § 2698 *et seq.*, seeking damages and civil penalties for violations of the California Labor Code and Business and Professions Code (Declaration of Evan S. Gaines [“Gaines Decl.”], ¶ 2);

WHEREAS, after a review of the claims and defenses to the Action, Plaintiff’s Counsel has concluded that it is in all Parties’ best interest to resolve Plaintiff’s individual claims only, which the Parties’ successfully achieved after a mediation (Gaines Decl., ¶ 3);

WHEREAS, the Parties have negotiated a settlement of Plaintiff’s individual claims only, and the representative PAGA claims will be dismissed *without* prejudice (the “Settlement”) (Gaines Decl., ¶ 4);

WHEREAS, the Settlement between Plaintiff and Defendant does not contemplate the waiver of any claims by anyone other than Plaintiff and does not provide for the waiver of representative PAGA claims asserted on behalf of any employee or the state, such that there is no allocation of civil penalties in the Settlement. (Gaines Decl. ¶ 5);

WHEREAS, concurrent to the filing of this Stipulation, the Parties have submitted the Settlement Agreement to the Labor and Workforce Development Agency in compliance with Labor Code section 2699(1)(2) (Gaines Decl. ¶ 6); and

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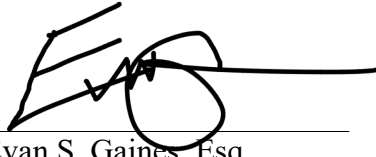
1 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the Parties hereto and
2 through their respective attorneys of record that Plaintiff's individual claims shall be dismissed with
3 prejudice, the claims of all allegedly aggrieved employees shall be dismissed without prejudice.

4 **IT IS SO STIPULATED.**

5
6 Dated: September 11, 2026

7 For Plaintiff SOFIA PANDELEA:

8 GAINES LAW CORPORATION

9
10 By: 
11 Evan S. Gaines, Esq.

Dated: September 11, 2026

For Defendant ATLISSIAN US, INC.

DUANE MORRIS LLP

By: /s/ Daniel Spencer*

Daniel Spencer, Esq.

* as authorized by e-mail on September 11,
2026

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13
14 **ORDER**

15 The Court, having reviewed the Parties' stipulation and any and all supporting papers, hereby
16 ORDERS that the action is hereby DISMISSED WITH PREJUDICE as to Sofia Pandealea's
17 individual claims, and DISMISSED WITHOUT PREJUDICE as to the representative claims under
18 PAGA asserted on behalf of all allegedly aggrieved employees.

19 **IT IS SO ORDERED.**

20
21
22 Dated: _____

JUDGE OF THE SUPERIOR COURT

1 **PROOF OF SERVICE AND CERTIFICATION**

2 I am employed in the County of Ventura, State of California. I am over the age of 18 and not a party to the
3 action. My business address is 4550 E. Thousand Oaks Blvd., Suite 100 Westlake Village, CA 91362.

4 _____ (For messenger) my business address is:

5 On September 11, 2026, I served the foregoing document described as **STIPULATION AND [PROPOSED]**
6 **ORDER DISMISSING REPRESENTATIVE PRIVATE ATTORNEYS GENERAL ACT ACTION** the interested
7 parties in this action by placing a true copy thereof enclosed in sealed envelopes addressed as follows:

8 **DUANE MORRIS LLP**
9 **Katherine L. Alphonso – KAlphonso@duanemorris.com**
10 **Spear Tower**
11 **One Market Plaza, Suite 2200**
12 **San Francisco, CA 94015-1127**

13 **Daniel D. Spencer – ddspencer@duanemorris.com**
14 **865 South Figueroa Street, Suite 3100**
15 **Los Angeles, CA 90017-5450**

16 **Attorneys for Defendant ATLISSIAN US, INC.**
17 **(Served via email only)**

18 On the above date:

19 _____ (BY ☒ U.S. MAIL/ BY ☐ CERTIFIED MAIL, RETURN RECEIPT REQUESTED) The sealed envelope was
20 mailed with postage thereon fully prepaid. I am "readily familiar" with the firm's practice of collection and processing
21 correspondence for mailing. It is deposited with United States postal service on that same day in the ordinary course of
22 business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage
23 meter date is more than one day after date of deposit for mailing in affidavit.

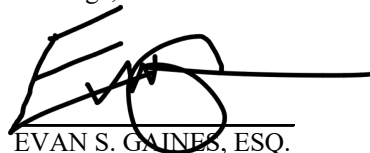
24 X (BY ELECTRONIC SERVICE) The above-stated document was submitted for service by electronic transmission
25 via email on the counsel of record listed above.

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

I certify that the above document was printed on recycled paper.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 11, 2026, at Westlake Village, California.

24 
25 EVAN S. GAINES, ESQ.