

EVAN S. GAINES, ESQ. SBN 287668
GAINES LAW CORPORATION
4550 E. Thousand Oaks Blvd., Suite 100
Westlake Village, CA 91362
Telephone: (805) 892-8200
Facsimile: (805) 800-8928
evan@gaines.law

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

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

**DECLARATION OF EVAN S. GAINES IN
SUPPORT OF STIPULATION
DISMISSING PLAINTIFF’S INDIVIDUAL
CLAIMS WITH PREJUDICE AND
REPRESENTATIVE PRIVATE
ATTORNEYS GENERAL ACT ACTION
WITHOUT PREJUDICE**

[Labor Code § 2698 *et seq.*]

[Filed Concurrently with Stipulation and
Order]

Complaint Filed: April 27, 2026

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

2

3
4
5
6

7
8
9
10
11
12

13
14
15

16
17

18
19
20
21

22
23
24

25

26

27

1 I declare, under penalty of perjury, under the laws of the State of California, that the
2 foregoing is true and correct. Executed on September 11, 2026 at Westlake Village, California.

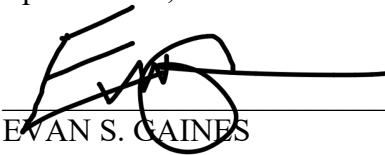
3
4 
EVAN S. GAINES

EXHIBIT A

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE AND CERTIFICATION

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

_____ (For messenger) my business address is:

On September 11, 2026, I served the foregoing document described as **DECLARATION OF EVAN S. GAINES IN SUPPORT OF STIPULATION RE: DISMISSING REPRESENTATIVE PRIVATE ATTORNEYS GENERAL ACT ACTION** the interested parties in this action by placing a true copy thereof enclosed in sealed envelopes addressed as follows:

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

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

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

On the above date:

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

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

 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.

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.



EVAN S. GAINES, ESQ.