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17 Attorneys for Plaintiff and all aggrieved employees

18 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
19 **FOR THE COUNTY OF SACRAMENTO**

20 FLOREE MCFADDEN; an individual, on
21 behalf of the State of California, as a private
22 attorney general,

23 **PLAINTIFF,**

24 v.

25 MAXIM HEALTHCARE STAFFING
26 SERVICES, INC. (now known as AMERGIS
27 HEALTHCARE STAFFING, INC.);
28 MONARCH MANAGEMENT SERVICES,
INC.; and DOES 1 thru 50, inclusive,

DEFENDANTS.

FILED
Superior Court of California
County of Sacramento

11/12/2025

V. Aleman, Deputy

CASE NO. 23CV010874

[Case Assigned for All Purposes to Hon. Hon.
Lauri A. Damrell in Dept. 22]

**~~PROPOSED~~ ORDER GRANTING
REQUEST FOR DISMISSAL WITH
PREJUDICE AS TO PLAINTIFF FLOREE
MCFADDEN ONLY AND WITHOUT
PREJUDICE AS TO PUTATIVE
AGGRIEVED EMPLOYEES**

1 The Court having considered Plaintiff's Declaration of Eric B. Kingsley in Support of
2 Request for Dismissal with Prejudice as To Plaintiff Floree McFadden Only and Without Prejudice
3 as To the Putative Aggrieved Employees of this entire action, hereby orders as follows:

4 Good cause being shown, IT IS HEREBY ORDERED that Plaintiff's Request for
5 Dismissal with prejudice as to Plaintiff Floree McFadden only and without prejudice as to the
6 putative aggrieved employees is hereby GRANTED. Each party is to bear its own costs, expenses,
7 and attorneys' fees associated with this action.

8 The claim is dismissed with prejudice to Plaintiff serving as a PAGA representative for the claims raised
9 in the complaint and PAGA notice, but without prejudice to other employees bringing such claims.
IT IS SO ORDERED.

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11 DATED: 11/12/2025



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13 Lauri A. Damrell, Judge
14 Superior Court Judge
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(PROOF OF SERVICE)
[CCP 1013(a)(3)]

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On October 28, 2025, I served all interested parties in this action the following documents described as: **[PROPOSED] ORDER GRANTING REQUEST FOR DISMISSAL WITH PREJUDICE AS TO PLAINTIFF FLOREE MCFADDEN ONLY AND WITHOUT PREJUDICE AS TO PUTATIVE AGGRIEVED EMPLOYEES**, by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

D.LAW, INC. EMIL DAVTYAN, Esq. Emil@d.law 400 N. Brand Blvd., 7th Floor Glendale, CA 91203 Attorneys for Plaintiff	Michael S. Kun Kevin D. Sullivan THOMPSON COBURN LLP 10100 Santa Monica Boulevard, Suite 500 Los Angeles, CA 90067 mkun@thompsoncoburn.com kdsullivan@thompsoncoburn.com Attorneys for Defendant Maxim Healthcare Staffing Services, Inc. (now known as Amergis Healthcare Staffing, Inc.)
Lilah J. Wylde, Esq. SEYFARTH SHAW LLP 560 Mission Street, Suite 3100 San Francisco, CA 94105 T: (415) 397-2823 F: (415) 397-8549 lwylde@seyfarth.com Attorneys for Defendant MONARCH MANAGEMENT SERVICES, INC.	Andrew M. Paley, Esq. SEYFARTH SHAW LLP 2029 Century Park East, Suite 3500 Los Angeles, CA 90067-3021 T: (415) 397-2823 F: (415) 397-8549 apaley@seyfarth.com Attorneys for Defendant MONARCH MANAGEMENT SERVICES, INC.

[XX] (BY ELECTRONIC MAIL TRANSMISSION): I caused the document to be send to the persons at the e-mail address(es) listed on the attached service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. A pdf copy of which was sent via email to the below email address(es).

[XX] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on October 28, 2025, at West Hurley, New York.



Sarah Ghoneim