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Attorneys for Plaintiff,
MEISHA CIAU

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

MEISHA CIAU, an individual

Plaintiff,

vs.

THE WESTBRASS COMPANY, INC., a California corporation; MAX HOMAMI, an individual; and DOES 1 through 50 inclusive

Defendants.

Case No. 26STCV08416

Hon. Steven A. Ellis
Dept. 56

REQUEST FOR DISMISSAL OF PAGA ACTION WITHOUT PREJUDICE AND REQUEST FOR DISMISSAL OF REMAINING INDIVIDUAL CLAIMS WITH PREJUDICE

(Submitted with 1) Declaration; and, 2) Proposed Order)

Complaint filed: March 16, 2026
Trial Date: None Set

WHEREAS, on May 18, 2026, Plaintiff MEISHA CIAU ("Plaintiff") filed her First Amended Complaint For Damages and Injunctive Relief; Enforcement Action Under The Private Attorneys General Act, California Labor Code § 2698, et seq. ("FAC") as against Defendants THE WESTBRASS COMPANY, INC, a California corporation, and MAX HOMAMI, an individual ("Defendants"), alleging individual claims for violations of the Labor Code, as well as an Eighth Cause of Action for violations of the Labor Code on behalf of all aggrieved employees under the Private Attorneys General Act ("PAGA") (Lab. Code, § 2698 et seq.) (*See*, Declaration of Calvin A. Marshall In Support of Request for Dismissal of PAGA Action (Marshall Decl.) at ¶ 3); and

WHEREAS, through further investigation, it came to light that Plaintiff's claims were likely unique to her, in that she was Defendant's only Graphic Designer / Marketing Manager. Additionally, Plaintiff's alleged wage and hour claims were minimal, while Plaintiff had a potential wrongful termination claim. In Plaintiff's counsels' opinion, this allowed resolution of Plaintiff's alleged individual claims, while not prejudicing the rights of other employees who felt aggrieved to proceed on their own behalf with their PAGA claims. In this regard, counsel for Plaintiff came to the opinion that representative PAGA claims were no longer viable. (Marshall Decl. at ¶ 4);

WHEREAS, as a result of very protracted negotiations, the parties have entered into a settlement agreement under which the parties have agreed to the dismissal of Plaintiff's PAGA claims **without prejudice** (Marshall Decl. at ¶ 5); and

WHEREAS, no notice of this action has been given to any aggrieved employee (Marshall Decl. at ¶ 6); and

WHEREAS, notice of this Request has been forwarded to the Labor and Workforce Development Agency ("LWDA") (Marshall Decl. at ¶ 7);

NOW THEREFORE, Plaintiff MEISHA CIAU respectfully requests that the Court dismiss her Eighth Cause of Action, for claims under the Private Attorneys General Act ("PAGA") (Lab. Code, § 2698 et seq.), **without prejudice**.

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Plaintiff MEISHA CIAU further respectfully requests that the Court dismiss all remaining claims in this matter, with prejudice.

Dated: October 20, 2026

THE OZZELLO PRACTICE, PC

By: _____

MARK A. OZZELLO
CALVIN A. MARSHALL
Attorneys for Plaintiff

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the State of California, County of Los Angeles. I am over the age of 18 and not a party to the within lawsuit; my business address is 26565 Agoura Road, Suite 200 Calabasas, CA 91302.

On **October 20, 2026,** I served the foregoing document described as: **REQUEST FOR DISMISSAL OF PAGA ACTION WITHOUT PREJUDICE AND REQUEST FOR DISMISSAL OF REMAINING INDIVIDUAL CLAIMS WITH PREJUDICE** on the interested parties in this action by placing **[X]** a true copy thereof on:

Labor and Workforce Development Agency (By Posting on the LWDA PAGA Website)	Renee N. Noy, Esq. renee@workwiselaw.com Alysha Zapata, Esq. alysha@workwiselaw.com WORKWISE LAW, PC 23945 Calabasas Road, Suite 200 Calabasas, CA 91302 *Attorneys for Defendants,* THE WESTBRASS COMPANY, INC., and MAX HOMAMI

[ ] (BY MAIL): as follows: I deposited the envelopes for mailing in the ordinary course of business at Los Angeles County, California. I am "readily familiar" with this firm's practice of collection and processing correspondence for mailing. Under that practice, the sealed envelopes are deposited with the U.S. Postal Service that same day in the ordinary course of business, with postage thereon fully prepaid at Los Angeles County, California.

[X] BY E-MAIL: I hereby certify that this document was served from Los Angeles County, California, by e-mail delivery on the parties listed herein at their most recent known e-mail address or e-mail of record in this action.

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

Executed on **October 20, 2026,** at Los Angeles County, California.

Calvin A. Marshall, Esq.
Type or Print Name


Signature