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Attorneys for Plaintiff,
Parham Barghchi

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SAN FRANCISCO**

PARHAM BARGHCHI, an individual, and in
his representative capacity on behalf of the State
of California, and other aggrieved employees,

Plaintiff,

vs.

GOOD LIVING SERVICES, INC., a California
corporation, GOOD LIVING MGMT II, INC.
dba Urbana Mission, a California corporation,
UGSF, INC. dba Urbana Geary, a California
corporation; MARTY HIGGINS, an individual,
STEPHEN SUKMAN, an individual, and DOES
1-25,

Defendants.

Case No. CGC-24-613022

**NOTICE OF MOTION AND MOTION
REQUESTING DISMISSAL OF ENTIRE
ACTION**

*[Filed concurrently with Memorandum of
Points and Authorities in Support of
Plaintiff's Request for Dismissal of Entire
Action; Declaration of Harris Emran, Esq. In
Support of Plaintiff's Request for Dismissal
of Entire Action; [Proposed] Order
Dismissing Entire Action]*

Hearing Date: April 9, 2025
Time: 9:00 a.m.
Dept: 302
Hon. Joseph M. Quinn

Complaint Filed: March 11, 2024
Trial Date: October 6, 2025

**TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD: PLEASE TAKE
NOTICE THAT** on April 9, 2025 at 9:00 a.m., or as soon thereafter as the matter may be heard, in
Department 302 of the above-entitled Court, Plaintiff Parham Barghchi will respectfully request the
Court's approval of the proposed and unopposed Dismissal of Entire Action, including dismissal of

1 Plaintiff's Ninth Cause of Action for civil penalties under the Labor Code Private Attorney General
2 Act (i.e., Labor Code section 2698 et seq., "PAGA").

3 This motion is made pursuant to California Code of Civil Procedure section 581 (b)(1),
4 which provides "[a]n action may be dismissed ... with or without prejudice, upon written request of
5 the plaintiff ... at any time before the actual commencement of trial..." and on the basis that the
6 parties have reached and fully executed an individual settlement agreement in the above-entitled
7 case that dismisses Plaintiff's individual claims with prejudice. One aspect of Plaintiff's claims
8 included a demand for relief under PAGA which requires court approval pursuant to Labor Code
9 §2699(s). Good cause exists for the Court to grant this unopposed Motion, as Plaintiff did not settle
10 the representative PAGA Claim, and his individual settlement agreement (attached to this
11 unopposed Motion) is not releasing any claims on behalf of the State of California or any Aggrieved
12 Employees. Thus, the parties seek court's approval of the individual settlement and dismissal of
13 PAGA claims without prejudice so that the matter may be dismissed entirely pursuant to the
14 settlement of the parties.

15 This Motion is based on this notice, the Memorandum of Points and Authorities in Support
16 of Dismissal, the Declaration of Harris Emran, Esq., as well as all records on file with this Court
17 and such evidence or oral argument as may be presented at the hearing.

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19 DATED: March 17, 2025

EMRAN LAW FIRM

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21 By: Harris Emran
22 Harris Emran
23 Attorney for PLAINTIFF and OTHER
24 AGGRIEVED EMPLOYEES
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