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Attorneys for Plaintiff NANSI ESTRADA,
on behalf of herself and others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SUTTER

NANSI ESTRADA, on behalf of herself and
others similarly situated,

Plaintiff,

vs.

AMPLA HEALTH, a California non-profit
Corporation; and DOES 1 through 50,
inclusive,

Defendants.

ENDORSED FILED
August 21, 2025
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SUTTER
CLERK OF THE COURT
By: Shara Hunter, Deputy

Case No.: CVCS24-0000178

**PLAINTIFF’S REQUEST FOR DISMISSAL
OF INDIVIDUAL CLAIMS WITH
PREJUDICE, AND PAGA
REPRESENTATIVE CLAIMS WITHOUT
PREJUDICE; DECLARATION OF
AMANDA FAZIO IN SUPPORT
THEREOF; [PROPOSED] ORDER**

Plaintiff Nansi Estrada (“Plaintiff”) hereby requests that the above-titled action be dismissed with prejudice as to Plaintiff’s individual claims, and without prejudice as to the claims of any unnamed aggrieved PAGA employees.

Dated: July 30, 2025

D.LAW, INC.

Emil Davtyan
Roman Shkodnik
Amanda Fazio
Attorneys for Plaintiff Nansi Estrada

DECLARATION OF AMANDA FAZIO

I, Amanda Fazio, declare:

1. I am an associate attorney of D.Law, Inc., attorneys of record for Plaintiff Nansi Estrada ("Plaintiff") in this action. I have personal knowledge of the facts herein. If called as a witness, I could and would competently testify to those facts under oath.

2. On or about January 25, 2024, Plaintiff filed a Class Action complaint on behalf of herself and other similarly situated against Ampla Health, alleging causes of action of 1) Failure to Pay Minimum Wages; 2) Failure to Pay Wages and Overtime Under Labor Code §510; 3) Meal-Period Liability Under Labor Code §226.7; 4) Rest-Break Liability Under Labor Code §226.7; 5) Reimbursement of Necessary Expenditures Under Labor Code §2802; 6) Violation of Labor Code §226(a); 7) Failure to Keep Required Payroll Records Under Labor Code §§1174 and 1174.5; 8) Penalties Pursuant to Labor Code §203; and 9) Violation of Business & Professions Code §17200 et seq., in Sutter County Superior Court, Case No.: CVCS24-0000178 (Referred to as "Action").

3. On or about March 20, 2024, Defendant filed a Petition to Compel Binding Arbitration for Plaintiff's individual claims since she had contractually agreed to submit her employment related claims to binding arbitration. Defendant also sought an order staying the civil proceedings.

4. On or about April 3, 2024, Plaintiff filed an amended complaint to add an additional cause of action for Penalties Pursuant to Labor Code § 2699, *et seq.* ("PAGA")

5. On May 30, 2024, the Court dismissed the class claims and ordered Plaintiff to submit her individual claims to arbitration.

6. Through lengthy discussions, Plaintiff has settled her individual claims and has elected to decline to continue litigating the PAGA representative action claims. Plaintiff would like to dismiss the PAGA representative lawsuit, without prejudice.

7. Other than the settlement of Plaintiff's individual claims, there is no other compensation of any kind being paid pursuant to the settlement. Plaintiff requests dismissal of her individual claims with prejudice.

9. Plaintiff has not served notice on the unnamed aggrieved PAGA employees and Plaintiff's counsel is unaware of anyone who has relied upon the existence of this action in lieu of pursuit of their individual or PAGA claims against Defendants. Therefore, Plaintiff's counsel requests that the Court order this matter to be dismissed without notice to the unnamed aggrieved employees. Attached is a [Proposed] Order Re: Dismissal.

10 I declare under penalty of perjury under the laws of the State of California that the above is
11 true and correct. Executed this 25th day of June, 2025, at Glendale, California.


Amanda J. Fazio

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PROPOSED ORDER

Based on Plaintiff Nansi Estrada’s Request for Dismissal and the Declaration of Amanda Fazio in support thereof, and good cause appearing therefore, the Court hereby approves the settlement and dismissal of Plaintiff’s individual claims with prejudice and orders the above-titled action dismissed without prejudice as to the claims of the unnamed aggrieved PAGA employees.

The Court finds that dismissal without notice will not prejudice the unnamed aggrieved PAGA employees and therefore, the action may be dismissed without notice to the unnamed aggrieved employees.

IT IS SO ORDERED.

Dated: <u>8/21/2025</u>	<u>Jeffrey A Thompson</u> JUDGE OF THE SUPERIOR COURT
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