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Attorneys for Defendants
MI PIACE, LLC
ARMEN SHIRVANIAN

**SUPERIOR COURT OF THE STATE OF CALIFORNIA,
FOR THE COUNTY OF LOS ANGELES**

CITLALI CALZADA, an individual,
Plaintiff,

v.

MI PIACE LLC, a California limited liability
company; ARMEN SHIRVANIAN, an
individual; and DOES 1 through 20, inclusive,
Defendants.

Case No.: 24STCV10397

*Assigned to the Honorable Jon R. Takasugi, Dept.
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**JOINT STIPULATION TO DISMISS
INDIVIDUAL CLAIMS WITH PREJUDICE
AND NON-INDIVIDUAL PAGA CLAIMS
WITHOUT PREJUDICE; [PROPOSED]
ORDER THEREON**

Action filed: April 25, 2024
Trial date: April 27, 2026

Plaintiff Citlali Calzada ("Plaintiff"), on behalf of herself and The State of California Labor &
Workforce Development Agency ("LWDA"), through her attorney of record, Setyan Law, APC, and

1 Defendants MI PIACE, LLC (“Mi Piacé”) and Armen Shirvanian (“Mr. Shirvanian”) (collectively
2 referred to herein as Defendants”) through their attorneys of record (Plaintiff and Defendants are
3 collectively referred to as the “Parties”), hereby stipulate and agree, as follows:

4 **WHEREAS, Plaintiff Citlali Calzada’s Complaint in this matter was filed on April 25, 2024**
5 **(the “Action”);**

6 WHEREAS, Plaintiff brought this Action against Defendants alleging the following causes of
7 action: (1) Discrimination In Violation Of Gov’t Code §§12940 Et Seq; (2) Harassment In Violation Of
8 Gov’t Code §§12940 Et Seq.; (3) Retaliation In Violation Of Gov’t Code §§12940 Et Seq; (4) Failure
9 To Prevent Discrimination, Harassment And Retaliation In Violation Of Gov’t Code §12940(k); (5)
10 Wrongful Termination In Violation Of Public Policy; (6) Failure To Pay Wages (Cal. Labor Code
11 §§201, 1194); (7) Failure To Provide Rest Periods (Cal. Labor Code §§226.7); (8) Failure To Provide
12 Itemized Wage And Hour Statements (Cal. Labor Code §§226, Et Seq.); (9) Waiting Time Penalties
13 (Cal. Labor Code §§201-203); (10) Private Attorneys General Act (Cal. Labor Code §2699, Et Seq);
14 (11) Unfair Competition (Bus. & Prof. Code §17200 Et Seq.); (12) Battery ; (13) Assault ; (14) Sexual
15 Battery (Civil Code §1708.5); (15) Intentional Infliction of Emotional Distress; and (16) Negligent
16 Supervision and Retention

17 WHEREAS, Defendants’ alleged violations under the California Labor Code, and the derivative
18 claims, serve as the basis for Plaintiff’s PAGA claims;

19 WHEREAS, Defendants deny that there is any factual or legal basis for the claims in this Action;

20 WHEREAS, the Parties mediated with reputed mediator David Phillips, Esq. on December 10, 2025,
21 and reached a settlement of Plaintiff’s individual claims, which includes Plaintiff’s agreement to dismiss
22 her individual claims with prejudice; WHEREAS, the Parties agree that Plaintiff’s position as hostess
23 limits the similarly aggrieved employees in the PAGA class to less than ten individuals;

24 WHEREAS, Plaintiff has not sought the express consent of other aggrieved employees to pursue
25 this lawsuit on their behalf;

26 WHEREAS, a claim under the California Labor Code Private Attorneys General Act of 2004,
27 California Labor Code §§2699 et seq. (“PAGA”) was part of the Complaint, wherein Plaintiff sought to
28 recover PAGA penalties on an individual basis and non-individual basis on behalf of other alleged

aggrieved employees;

WHEREAS, Plaintiff shall serve this stipulation to dismiss the non-individual PAGA claims without prejudice to the California Labor Workforce (“LWDA”) after Court approval;

WHEREAS, this Court may determine that the rights of other aggrieved employees will not be prejudiced for two significant reasons. *First*, unlike class actions where the class plaintiff prosecutes the action on behalf of the putative class members, Plaintiff here did *not* prosecute the action on behalf of the alleged similarly-aggrieved employees. In PAGA claims, the plaintiff employee prosecutes on behalf of the Labor Commissioner; the alleged similarly-aggrieved employees have no private right of action outside of PAGA. *Rope v. Auto-Chlor System of Washington, Inc.* (2013) 220 Cal.App.4th 635, 650¹ (“In PAGA, the Legislature created an enforcement mechanism for aggrieved employees to file representative actions to recover penalties in cases in which there is no private cause of action as an alternative to enforcement by the Labor Commissioner”); *Arias v. Superior Court* (2009) 46 Cal.4th 969, 980–987 (PAGA suit is a representative action and need not be brought as a class action). *Second*, there has been no discovery as to the identities of other alleged aggrieved employees, nor has notice of this Action been provided to other aggrieved employees. Thus, the Parties are not aware of any other alleged aggrieved employees who have any expectations of recovery of any kind in this case, and a dismissal of non-individual PAGA claims without prejudice does not preclude other employees from pursuing claims. Third, the alleged aggrieved employees will not be prejudiced by dismissal of this action because their claims are being dismissed without prejudice and any statute of limitations for the alleged aggrieved employees were tolled during the pendency of this action; and

WHEREAS, Defendants have fulfilled their obligations under the Parties’ settlement agreement and Plaintiff wishes to dismiss her individual claims with prejudice and her non-individual PAGA claims without prejudice.

NOW, THEREFORE, the Parties stipulate and agree, and good cause having been shown, subject to the Court’s approval, as follows:

1. Plaintiff agrees to dismiss and hereby dismisses all individual claims in the Action with prejudice;

¹ Superseded by statute on unrelated ground.

2. Plaintiff agrees to dismiss and hereby dismisses her non-individual claims under PAGA in the
Action without prejudice.

IT IS SO STIPULATED between the Parties.

DATED: March 2, 2026

SETYAN LAW, APC.

By:



Samvel Setyan, Esq.
Attorneys for Plaintiff,
CITLALI CALZADA

DATED: March 2, 2026

O'HAGAN MEYER LLP

By:



Parshant Mahbubani, Esq.
Attorneys for Defendants
MI PIACE, LLC
ARMEN SHIRVANIAN

1 **~~PROPOSED~~ ORDER**

2 The Court, having considered the stipulation by the Parties requesting the Court's approval to
3 dismiss Plaintiff's claims, including Plaintiff's claims under the California Labor Code Private Attorneys
4 General Act of 2004 ("PAGA") (California Labor Code §§2699 et seq.), and good cause appearing
5 therefor, it is hereby:

- 6 1. **ORDERED** that Plaintiff's non-individual PAGA claims in the Action are dismissed without
7 prejudice; and
8 2. **ORDERED** that Plaintiff's individual claims in the Action are dismissed with prejudice; and
9 3. **ORDERED** that a copy of this Court Order shall be submitted to the Labor and Workforce
10 Development Agency by Plaintiff within fifteen (15) days after entry of this Order.

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12 **IT IS SO ORDERED.**

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14 DATED: 03/11/26



15 HON. JON R. TAKASUGI
16 JUDGE OF SUPERIOR COURT

17 Jon R. Takasugi / Judge
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