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Sabrina Chin

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

SABRINA CHIN, an individual, and in her
representative capacity on behalf of the State of
California, and other aggrieved employees,

Plaintiff,

vs.

TITAN MANAGEMENT GROUP, LLC, a
California Limited Liability Company; and
DOES 1 through 15, inclusive,

Defendants.

Case No. CGC-24-615976

**NOTICE OF MOTION AND
UNOPPOSED 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 14, 2025
Time: 9:00 a.m.
Dept: 302
Hon. Joseph M. Quinn

Complaint Filed: June 27, 2024
Trial Date: not set

**TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD: PLEASE TAKE
NOTICE THAT** on April 14, 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 Sabrina Chin will respectfully request the
Court's approval of the proposed and unopposed Dismissal of Entire Action, including dismissal of

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

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

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

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20 DATED: March 18, 2025

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