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Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ALAMEDA**

KYLE JACOBS, individually, and on behalf of
other aggrieved employees pursuant to the
California Private Attorneys General Act;

Plaintiff,

vs.

GOODFELLOW BROS. CALIFORNIA, LLC,
a California limited liability company;
GOODFELLOW BROS. LLC, a Washington
limited liability company; and DOES 1 through
100, inclusive,

Defendants.

Case No.: 24CV086612

Honorable Brad Seligman
Department 22

**REQUEST FOR DISMISSAL OF
ACTION; [~~PROPOSED~~] ORDER**

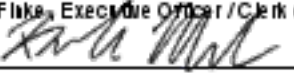
*[Filed concurrently with Declaration of
Margaux Gundzik In Support Thereof]*

Complaint Filed: August 8, 2024
Trial Date: None Set

FILED
Superior Court of California
County of Alameda

01/24/2025

Clad File, Executive Officer / Clerk of the Court

By:  Deputy
B. Mercado

Plaintiff Kyle Jacobs (“Plaintiff”), by and through his undersigned counsel of record, will and hereby does move this Court for an order dismissing the Complaint in its entirety as follows:

1. The representative PAGA allegations and claims alleged in the Complaint shall be dismissed without prejudice; and

2. The entire Complaint and all causes of action concerning Plaintiff Kyle Jacobs’ individual claims shall be dismissed with prejudice.

WHEREAS, on or about August 8, 2024, Plaintiff Kyle Jacobs filed the above-captioned action in this Court (the “Complaint”), against Defendants entitled Goodfellow Bros. California, LLC and Goodfellow Bros. LLC, Alameda Superior Court, Case No.: 24CV086612, asserting claims for violations of the California Labor Code Pursuant to the California Private Attorneys’ General Act (“PAGA”) (the “Lawsuit”);

WHEREAS, the parties in this Lawsuit have reached a resolution of all claims Plaintiff, individually, might have against Defendants, and Plaintiff no longer wishes to pursue the Lawsuit;

WHEREAS, the Parties agree that the Complaint has not become widely known to the public in general, no notice of the pendency of this action or privacy notice has been sent to the aggrieved employees, and PAGA claims will not bar any aggrieved employees from filing an individual claim on similar grounds against Defendants;

WHEREAS, the Parties have entered into a confidential settlement with respect to a compromise of Plaintiff’s individual claims. A true and correct copy of the Settlement Agreement can be provided to the Court for review upon request. No claims were settled on behalf of the aggrieved employees. No settlement negotiations were conducted on the part of the aggrieved employees. No settlement amount will be paid on behalf of the aggrieved employees. No attorneys’ fees or costs were paid in relation to or on behalf of any representation of the aggrieved employees;

WHEREAS, Plaintiff’s counsel intends that her signature below be a certification under penalty of perjury under the laws of the State of California that the factual representations in Paragraphs 2 through 5 above are the facts upon which Plaintiff relies in seeking this Court’s

1 approval of this stipulation.

2 This request is made pursuant to California Code of Civil Procedure § 581(b) and any
3 other applicable authority. The request is based the accompanying Declaration of Margaux
4 Gundzik, and the pleadings and papers on file in this matter.

5
6 Dated: December 23, 2024

LAWYERS for JUSTICE, PC

7
8 By: 
9 Margaux Gundzik
10 Attorneys for Plaintiff

~~PROPOSED~~ ORDER

Based on the above Request and Declaration of Margaux Gundzik, and for good cause shown, IT IS HEREBY ORDERED as follows:

1. The representative PAGA allegations and claims alleged in the Complaint are dismissed without prejudice; and
2. Plaintiff Kyle Jacobs's individual PAGA claims are dismissed with prejudice.

IT IS SO ORDERED.

DATED: 01/24/2025



HONORABLE BRAD SELIGMAN
Judge of the Superior Court