

Kevin A. Lipeles (Bar No. 244275)
Thomas H. Schelly (Bar No. 217285)
Jasmine J. Badawi (Bar No. 335433)
LIPELES LAW GROUP, APC
880 Apollo St., Suite 336
El Segundo, California 90245
Telephone: (310) 322-2211
Fax: (310) 322-2252
kevin@kallaw.com
thomas@kallaw.com
jasmine@kallaw.com

Attorney for Plaintiff,
RAOUL HENRY ALEXIS

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

RAOUL HENRY ALEXIS, an individual,
on his own behalf and on behalf of all
others similarly situated

Plaintiff,

v.

LEADERS IN COMMUNITY
ALTERNATIVES, INCORPORATED, a
California corporation; and DOES 1
through 100, inclusive,

Defendants.

Case No.: 24CV080284

Assigned for All Purposes to
Judge: Somnath Chatterjee
Department: 21

**DECLARATION OF JASMINE J. BADAWI
RE JOINT REQUEST TO VOLUNTARILY
DISMISS THE CLASS CLAIMS ASSERTED
AGAINST ALL DEFENDANTS WITH
PREJUDICE AS TO PLAINTIFF AND
WITHOUT PREJUDICE AS TO ABSENT
PUTATIVE CLASS MEMBERS**

[Filed concurrently with the Joint Request for
Voluntary Dismissal of all Claims asserted
Against All Defendants with Prejudice as To
Plaintiff and Without Prejudice as to Absent Class
Members and Proposed Order]

Action Filed: June 18, 2024

I, Jasmine J. Badawi, declare:

1. I am an attorney at law, licensed to practice in the State of California. I am an
associate of Lipeles Law Group, A Professional Corporation, counsel of record for Plaintiff RAOUL
HENRY ALEXIS ("Plaintiff") in this action. I have personal knowledge of the following facts and
would competently testify thereto if called upon to do so.

1 2. This declaration is submitted pursuant to California Rules of Court, Rule 3.770, and
2 requests that the Court dismiss the entire action with prejudice as to Plaintiff and to dismiss the
3 entire action without prejudice as to the putative class members. Plaintiff also requests that notice
4 to the putative class members of the dismissal not be required.

5 3. Rule 3.770(a) requires that a request for dismissal of a class action be accompanied
6 by a declaration setting forth detailed facts explaining any consideration, direct or indirect, given
7 for the dismissal. Rule 3.770(b) provides that the court may grant the request without a hearing.

8 4. On June 18, 2024, Plaintiff filed the present action, alleging causes of action on
9 behalf of himself and a class of similarly-situated former and current employees of Defendant
10 LEADERS IN COMMUNITY ALTERNATIVES, INC. (“Defendant”) who were allegedly not paid
11 overtime wages due, not provided with itemized wage statements, not provided with all wages due
12 upon termination, not reimbursed for all business expenses, not paid reporting time pay, not allowed
13 to inspect employment records, and not timely paid wages during employment, as well as a request
14 for injunctive relief in accordance with Business & Professions Code section 17200. On August 8,
15 2024, Plaintiff filed the First Amended Complaint to include a ninth cause of action for damages
16 pursuant to the Private Attorneys General Act.

17 5. On July 16, 2025, after mediation, the Parties reached an agreement to dismiss
18 Plaintiff’s claims with prejudice and all claims related to the putative class members without
19 prejudice, in exchange for consideration paid by Defendant to Plaintiff.

20 6. Plaintiff requests that this matter be dismissed in its entirety with prejudice as to
21 Plaintiff and without prejudice as to the putative class members. Class certification has not occurred,
22 no unnamed class members have been notified of this action, and our office is unaware of any
23 putative class members who have refrained from bringing a similar claim due to the existence of
24 this action. As such, the putative class members will not be prejudiced by the dismissal.

25 7. Plaintiff also requests that the dismissal be entered without notice being required to
26 be given to the putative class members. California Rules of Court, rule 3.770(c) states, in part, that
27 if the Court has not ruled on class certification, “the action may be dismissed without notice to the
28 class members if the court finds that the dismissal will not prejudice them.” As discussed above, no

1 putative class member will be prejudiced by a dismissal. Accordingly, Plaintiff requests that notice
2 not be required.

3 I declare under penalty of perjury under the laws of the State of California that the foregoing
4 is true and correct.

5 Executed this 23rd day of September 2025, at El Segundo, California.

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8 Jasmine J. Badawi, Declarant
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