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Attorneys for Plaintiffs Peter Sumo, Francisco Mora,
Hector Lopez, Frank Brown, and Anthony West,
on behalf of themselves and all “aggrieved employees”
pursuant to Labor Code § 2698 *et seq.*

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN JOAQUIN

PETER SUMO, on behalf of himself and all
“aggrieved employees” pursuant to Labor
Code § 2698 *et seq.*,

Plaintiff,

v.

SOLARGISTIX LLC, a Delaware limited
liability company, and DOES 1 through 10,
inclusive,

Defendants.

CASE NO: STK-CV-UOE-2024-10506

Assigned to the Hon. George J. Abdallah, Dept. 10A

**PLAINTIFFS’ REQUEST FOR DISMISSAL;
[PROPOSED] ORDER**

[Filed Concurrently: Declaration of Evan S. Gaines in
Support of Request for Dismissal]

Complaint Filed: August 27, 2024

1 **REQUEST FOR DISMISSAL**

2 Based on the facts set forth in the concurrently-filed Declaration of Evan S. Gaines, Plaintiffs
3 Peter Sumo, Francisco Mora, Hector Lopez, Frank Brown, and Anthony West (“Plaintiffs”) hereby
4 requests that the Court enter a dismissal of this action ***WITH PREJUDICE*** as to Plaintiffs’ individual
5 claims and ***WITHOUT PREJUDICE*** as to the PAGA representative claims.

6 Dated: May 7, 2026

Respectfully submitted,

7 GAINES LAW CORPORATION

8
9 By:



10 EVAN S. GAINES

11 Attorneys for Plaintiffs

12 **ORDER**

13 Based on the Request for Dismissal and the concurrently-filed Declaration of Evan S. Gaines,
14 it is hereby ORDERED that this action is dismissed WITH PREJUDICE as to Plaintiffs’ individual
15 claims and WITHOUT PREJUDICE as to the PAGA representative claims.

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17 Dated: _____

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JUDGE OF THE SUPERIOR COURT

1 **PROOF OF SERVICE AND CERTIFICATION**

2 I am employed in the County of Ventura, State of California. I am over the age of 18 and not a party to the
3 within action; my business address is 4550 East Thousand Oaks Boulevard, Suite 100, Westlake Village, CA 91362.

4 On May 7, 2026, I served the foregoing document described as **PLAINTIFFS' REQUEST FOR DISMISSAL;**
5 **[PROPOSED] ORDER** on the interested parties in this action by placing a true copy' thereof enclosed in sealed envelopes
6 addressed as follows:

7 **Alidad Vakili**
8 **Womble Bond Dickinson (US) LLP**
9 **50 California Street, Suite 2750**
10 **San Francisco, CA 94111**
11 **Attorneys for Defendant**
12 **SOLARGISTIX LLC**
13 **Alidad.Vakili@wbd-us.com**

14 On the above date:

15 X (BY ELECTRONIC SERVICE) The above-stated document was submitted for service by electronic transmission
16 via email on the counsel of record listed above.

17 X (UPLOADED TO LWDA WEB PORTAL) I caused the above-described documents to be delivered to the Labor
18 & Workforce Development Agency via online process at the PAGA Filing website (www.dir.ca.gov)
19 in accordance with the procedure imposed by the LWDA.

20 I certify that the above document was printed on recycled paper.

21 I declare under penalty of perjury that the foregoing is true and correct.

22 Executed on May 7, 2026, at Westlake Village, California.

23 
24 _____
25 Evan S. Gaines