

EVAN S. GAINES, Esq. SBN 287668
GAINES LAW CORPORATION
4550 E. Thousand Oaks Blvd., Suite 100
Westlake Village, CA 91362
Telephone: (805) 892-8200
Facsimile: (805) 800-8928
Email: evan@gaines.law

Attorneys for Plaintiff Arthur Seals,
on behalf of himself and all “aggrieved employees”
pursuant to Labor Code § 2698 *et seq.*

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA

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

Plaintiff,

v.

LIFEMOVES, a California nonprofit
corporation, and DOES 1 through 10,
inclusive,

Defendants.

CASE NO: 24CV445868

Assigned to the Hon. Daniel T Nishigaya, Dept.
13

**STIPULATION AND [PROPOSED] ORDER
DISMISSING REPRESENTATIVE PRIVATE
ATTORNEYS GENERAL ACT ACTION**

[Labor Code § 2698 *et seq.*]

[Filed Concurrently with Declaration of Evan S.
Gaines]

Complaint Filed: August 22, 2024

STIPULATION

WHEREAS, on August 22, 2024, Plaintiff Arthur Seals, on behalf of himself and all “aggrieved employees” pursuant to Labor Code § 2698 *et seq.*, filed a Representative Action complaint pursuant to the Labor Code Private Attorneys General Act of 2004 against Defendant Lifemoves (“Defendant”) seeking civil penalties for violations of the California Labor Code premised on a June 18, 2024 notice submitted to the California Labor and Workforce Development Agency (“LWDA”) (Declaration of Evan S. Gaines [“Gaines Decl.”], ¶ 2);

WHEREAS, on September 12, 2024, Plaintiff amended his complaint to include additional PAGA claims premised on a July 9, 2024 supplemental notice submitted to the LWDA. The First Amended Complaint is the operative complaint in this Action (Gaines Decl., ¶ 3);

WHEREAS, after a review of the claims and defenses to the First Amended Complaint, and considering that a previously filed Class and Representative Action against Defendant (*Favela v. Lifemoves*, Santa Clara Superior Court Case No. 24CV436819—the “*Favela* Action”) will fully release the claims alleged in the First Amended Complaint, Plaintiff’s Counsel has concluded that it is in all Parties’ best interest to resolve Plaintiff’s individual claims only (Gaines Decl., ¶ 4);

WHEREAS, the Parties have negotiated a settlement of Plaintiff’s individual claims only, and Plaintiff’s PAGA claims will be dismissed *without* prejudice (the “Settlement”) (Gaines Decl., ¶ 5); and

WHEREAS, the Settlement between Plaintiff and Defendant does not contemplate the waiver of any claims by anyone other than Plaintiff and does not provide for the waiver of PAGA claims asserted on behalf of any employee or the state, such that there is no allocation of civil penalties in the Settlement. Indeed, these individuals and the state of California will be eligible to receive compensation from the previously filed *Favela* Action, referenced above. (Gaines Decl. ¶ 6).

NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the Parties hereto and through their respective attorneys of record that Plaintiff’s individual claims shall be dismissed with prejudice, the claims of all allegedly aggrieved employees (except Plaintiff) shall be dismissed without prejudice, and the Court shall retain jurisdiction pursuant to Code of Civil Procedure Section

664.6 with respect to all matters related to the consummation of the settlement, including to enforce the Settlement.

IT IS SO STIPULATED.

Dated: March 13, 2026

For Plaintiff:

GAINES LAW CORPORATION

By:


Evan S. Gaines, Esq.

For Defendant Scoot Education, Inc.

DORSEY & WHITNEY LLP

By:


Hannah Green, Esq.

ORDER

The Court, having reviewed the Parties' stipulation and any and all supporting papers, hereby
ORDERS that:

1. The action is hereby DISMISSED WITH PREJUDICE as to Arthur Seals' individual
claims, and DISMISSED WITHOUT PREJUDICE as to claims under PAGA asserted on behalf of
all allegedly aggrieved employees; and

2. The Court shall retain jurisdiction pursuant to Code of Civil Procedure Section 664.6
with respect to all matters related to the consummation of the settlement, including to enforce the
Settlement.

IT IS SO ORDERED.

Dated: _____

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 action. My business address is 4550 E. Thousand Oaks Blvd., Suite 100 Westlake Village, CA 91362.

4 _____ (For messenger) my business address is:

5 On March 13, 2026, I served the foregoing document described as **STIPULATION AND [PROPOSED]**
6 **ORDER DISMISSING REPRESENTATIVE PRIVATE ATTORNEYS GENERAL ACT ACTION** the interested
7 parties in this action by placing a true copy thereof enclosed in sealed envelopes addressed as follows:

8 **Nisha Verma - verma.nisha@dorsey.com**
9 **Hannah Green - Green.Hannah@dorsey.com**
10 **DORSEY & WHITNEY LLP**
11 **600 Anton Boulevard**
12 **Costa Mesa, CA 92626**

13 On the above date:

14 _____ (BY ☒ U.S. MAIL/ BY ☐ CERTIFIED MAIL, RETURN RECEIPT REQUESTED) The sealed envelope was
15 mailed with postage thereon fully prepaid. I am "readily familiar" with the firm's practice of collection and processing
16 correspondence for mailing. It is deposited with United States postal service on that same day in the ordinary course of
17 business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage
18 meter date is more than one day after date of deposit for mailing in affidavit.

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

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

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

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

26 Executed on March 13, 2026, at Westlake Village, California.

27 
28 _____
EVAN S. GAINES, ESQ.