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Attorneys for Plaintiff,
DANIEL CAMACHO

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

DANIEL CAMACHO, an individual, and in his
representative capacity on behalf of the State of
California, and other Aggrieved Employees,

Plaintiff,

vs.

STONE EMPIRE FABRICATION, a California
Limited Liability Company, and DOES 1-15

Defendants.

Case No. 24CV097237

**NOTICE OF MOTION AND 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: September 10, 2025

Time: 3:00 p.m.

Dept: 20

Hon. Karin Schwartz

Hearing Reservation Number: 502026028855

Complaint Filed: October 24, 2024

Trial Date: April 24, 2026

**TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD: PLEASE TAKE
NOTICE THAT** on September 10, 2025 at 3:00 p.m., or as soon thereafter as the matter may be
heard, in Department 20 of the above-entitled Court, Plaintiff Daniel Camacho will respectfully
request the Court's approval of the proposed and unopposed Dismissal of Entire Action, including

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

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

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

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18 DATED: May 13, 2025

EMRAN LAW FIRM

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20 By: Harris Emran
21 Harris Emran
22 Attorney for PLAINTIFF and OTHER
23 AGGRIEVED EMPLOYEES
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