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Attorneys for Defendant

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

AALIYAH GANDARA, individually, and on
behalf of other members of the general public
similarly situated;

Plaintiff,

v.

CHOICE HOMECARE, LLC, a Delaware
limited liability company; and DOES 1 through
100, inclusive;

Defendants.

Case No.: 24STCV32325

Assigned for All Purposes to:
Honorable Elihu Berle
Department 6

**JOINT STIPULATION AND
~~PROPOSED~~ ORDER TO LIFT THE
STAY AND TO GRANT REQUEST
FOR DISMISSAL**

[Request for Dismissal and Declaration of
Douglas Han filed concurrently herewith]

Complaint Filed: December 6, 2024
Trial Date: None Set

FILED
Superior Court of California
County of Los Angeles

07/07/2026

David W. Slayton, Executive Officer / Clerk of Court

By: B. Cumplido Deputy

**TO THE HONORABLE COURT, ALL PARTIES AND THEIR ATTORNEYS OF
RECORD:**

Plaintiff Aaliyah Gandara (“Plaintiff”) and Defendant Choice Homecare, LLC (“Defendant”) (collectively, the “Parties”), by and through their respective counsel of record, hereby stipulate as follows:

WHEREAS, on December 6, 2024, Plaintiff filed the class action and Private Attorneys General Act of 2004 (“PAGA”) lawsuit against Defendant in the Superior Court of California, County of Los Angeles (Case No. 24STCV32325);

WHEREAS, on May 16, 2025, the Court granted Defendant’s Motion to Compel Individual Arbitration, Dismiss the Class Claims, and Stay Non-Individual PAGA Claims Pending Outcome of Arbitration;

WHEREAS, on June 24, 2026, the Parties entered into an individual settlement agreement, which entailed the dismissal of this lawsuit;

WHEREAS, this lawsuit is stayed and dismissal cannot be completed until the stay has been lifted. As a result, the Parties have agreed to stipulate to lift the stay on this lawsuit.

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1 IT IS HEREBY STIPULATED by the undersigned Parties that the stay placed on this
2 lawsuit should be lifted and that the Request for Dismissal requesting for the dismissal of the
3 representative PAGA claims without prejudice and dismissal of the individual claims with
4 prejudice that has been filed concurrently herewith should be granted.

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6 Dated: July 2, 2026

JUSTICE LAW CORPORATION

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8 By: 
9 Douglas Han
10 Talia Lux
11 *Attorneys for Plaintiff*

12
13 Dated: July 2, 2026

POLSINELLI LLP

14 By: /s/ Sarah Oh
15 Lindsay David
16 Sarah Oh
17 *Attorneys for Defendant*
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~~PROPOSED~~ ORDER

Pursuant to the above Stipulation and good cause appearing, IT IS HEREBY ORDERED that: (1) the stay placed on this lawsuit is lifted; and (2) the Request for Dismissal requesting for the dismissal of the representative PAGA claims without prejudice and dismissal of the individual claims with prejudice that has been filed concurrently herewith pursuant to the individual settlement agreement is granted.

IT IS SO ORDERED.



Elihu M. Berle

Dated: 7/7/2026

Elihu M. Berle / Judge
Honorable Elihu Berle
Judge of the Superior Court

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I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 751 N. Fair Oaks Avenue, Suite 101, Pasadena, CA 91103 and my electronic service address is nalonsoesteban@justicelawcorp.com

On July 9, 2026, I served the foregoing document described as

for the following case:	Gandara v. Choice HomeCare, LLC
LWDA/Court Case No.:	LWDA Case No.: CM-1052286-24
	Court Case No.: 24STCV32325
	Los Angeles County Superior Court

on interested parties in this action by electronically submitting as follows:

State of California
Labor & Workforce Development Agency
800 Capitol Mall, MIC-55
Sacramento, California 95814

[X] BY ELECTRONIC SUBMISSION

Pursuant to California Senate Bill No. 836, I caused the documents described above to be electronically submitted by and through the procedure stated on the website of the State of California Labor and Workforce Development Agency.

[X] STATE

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

Executed on July 9, 2026, at Pasadena, California.

Rocky

Noelia Alonso Esteban