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Attorneys for Plaintiff Freddy Adriano,
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 LOS ANGELES

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

Plaintiff,

v.

TRATTORIA AMICI/AMERICANA, LP, a
California limited partnership, and DOES 1
through 10, inclusive,

Defendants.

Case No: 25NNCV00669

*Assigned to the Hon. William A. Crowfoot,
Dept. 3*

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

[Labor Code § 2698 *et seq.*]

[Filed Concurrently with Declaration of Evan
S. Gaines]

Complaint Filed: January 31, 2025

STIPULATION

WHEREAS, on January 31, 2025, Plaintiff Freddy Adriano, on behalf of himself and on behalf of all aggrieved employees filed an individual and representative complaint against Defendant TRATTORIA AMICI/AMERICANA, LP, a California limited partnership (“Defendant”), pursuant to the Labor Code Private Attorneys General Act of 2004 (“PAGA”), Labor Code § 2698 *et seq.*, seeking damages, unpaid gratuities, and civil penalties for violations of the California Labor Code (Declaration of Evan S. Gaines [“Gaines Decl.”], ¶ 2);

WHEREAS, after a review of the claims and defenses to the Action, and considering Defendant’s contentions that Plaintiff has been paid all wages due and owing and maintains claims that are individual to the other Aggrieved Employees, Plaintiff’s Counsel has concluded that it is in all Parties’ best interest to resolve Plaintiff’s individual claims only (Gaines Decl., ¶ 3);

WHEREAS, the Parties have negotiated a settlement of Plaintiff’s individual claims only, and the representative PAGA claims will be dismissed *without* prejudice (the “Settlement”) (Gaines Decl., ¶ 4);

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 representative PAGA claims asserted on behalf of any employee or the state, such that there is no allocation of civil penalties in the Settlement. (Gaines Decl. ¶ 5);

WHEREAS, concurrent to the filing of this Stipulation, the Parties have submitted the Settlement Agreement to the Labor and Workforce Development Agency in compliance with Labor Code section 2699(l)(2) (Gaines Decl. ¶ 6); and

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1 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the Parties hereto
2 and through their respective attorneys of record that Plaintiff's individual claims shall be dismissed
3 with prejudice, the claims of all allegedly aggrieved employees shall be dismissed without
4 prejudice, and the Court shall retain jurisdiction pursuant to Code of Civil Procedure Section 664.6
5 with respect to all matters related to the consummation of the settlement, including to enforce the
6 Settlement.

7 **IT IS SO STIPULATED.**

8 Dated: September 9, 2025

9 For Plaintiff Freddy Adriano:

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11 GAINES LAW CORPORATION

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13 By: /s/ Evan S. Gaines
14 Evan S. Gaines, Esq.

For Defendant Trattoria Amici/Americana, LP

10 GORDON REES SCULLY MANSUKHANI,
11 LLP

12 By: /s/ Neo Chen*

Dina Glucksman, Esq.

Neo Chen, Esq.

13 *as authorized by email on September 9,
14 2025

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 Freddy Adriano's individual claims, and DISMISSED WITHOUT PREJUDICE as to the representative 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 September 9, 2025, I served the foregoing document described as **STIPULATION AND [PROPOSED]**
6 **ORDER DISMISSING INDIVIDUAL AND REPRESENTATIVE PRIVATE ATTORNEYS GENERAL ACT**
7 **ACTION** the interested parties in this action by placing a true copy thereof enclosed in sealed envelopes addressed as
8 follows:

9 Dina Glucksman, Esq. – dglucksman@grsm.com
10 Neo Chen, Esq. – nchen@grsm.com
11 Susana Tello – stello@grsm.com
12 Rachel Merker – rmerker@grsm.com
13 **Gordon Rees Scully Mansukhani, LLP**

14 On the above date:

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

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

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

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

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

27 Executed on September 9, 2025, at Westlake Village, California.

28 /s/ Evan S. Gaines
EVAN S. GAINES, ESQ.