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

DOUGLAS WORKMAN, individually, and on
behalf of all others similarly situated,

Plaintiff,

v.

VERSATILE STUDIOS, INC, a California
Corporation; MICHAEL DOS SANTOS, an
individual; SEAN FRENCH, an individual; and
DOE 1 through and including DOE 10,

Defendants.

Case No: 25STCV16425

Location: Dept. 7

Judge: Hon. Samantha Jessner

**PLAINTIFF'S REQUEST FOR
DISMISSAL OF CLASS ACTION
COMPLAINT WITHOUT PREJUDICE**

Date: December 9, 2025

Time: 9:00 a.m.

Dept.: 7

Spring Street Courthouse
312 North Spring Street
Los Angeles, CA 90012

File Date: June 4, 2025

Trial Date: None Set

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

3 Plaintiff respectfully requests that the Court dismiss this action in its entirety, with Plaintiff's
4 individual claims dismissed *with* prejudice, and class claims dismissed *without* prejudice. Plaintiff's
5 counsel has submitted an accompanying declaration in support of dismissal pursuant to California Rule
6 of Court 3.770. Plaintiffs are lodging a copy of the proposed settlement with the Court for approval.

7 Date: December 9, 2025

HARRIS & RUBLE

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11 David Garrett
12 Attorney for Plaintiff
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PROOF OF SERVICE

I am over the age of eighteen years, and not a party to the within action. My business address is Harris & Ruble, 655 North Central Avenue, 17th Floor, Glendale, California 91203. On October 30, 2025, I served the within documents:

REQUEST FOR DISMISSAL OF CLASS ACTION COMPLAINT

Electronic Service: I caused the above-entitled document(s) to be served by e-mail (CaseAnywhere) to:

Doug Roy doug@cypressllp.com
Alysse Florez alysse@cypressllp.com
Lilian Loh lilian@cypressllp.com

U.S. Mail: I am readily familiar with the Firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business, addressed as follows:

N/A

I declare under penalty of perjury that the above is true and correct. Executed on October 30, 2025, at Los Angeles, California.



Tom Brennan