



ZAKAY LAW GROUP
A PROFESSIONAL LAW CORPORATION

Client #64801

October 10, 2024

Labor & Workforce Development Agency
Attn. PAGA Administrator
1515 Clay Street, Ste. 801
Oakland, CA 94612
PAGA@dir.ca.gov
Via Online Submission

Case Name: *Arif Akhtar v. Akraya Inc.*
LWDA No. LWDA-CM-972672-23
Re: Notice of Abandonment of Claims

Dear Sir/Madam:

Please be advised that on or around August 15, 2024, the Claimant in the above referenced matter entered into a settlement agreement whereby he agreed to release the Defendant from all liability for his individual claims. The settlement and release are without prejudice as to the Aggrieved Employees but with prejudice as to the Claimant's ability to pursue claims under PAGA. Therefore, this letter is intended to notify you of Claimant's abandonment of his PAGA claims. Enclosed, please find the Conformed Order Granting Dismissal of Entire Action.

If you have any questions or concerns, please do not hesitate to contact me at the above number and address.

Sincerely,

Shani O. Zakay
Attorney for Plaintiff

RECEIVED

VENTURA SUPERIOR COURT

10/3/24

ZAKAY LAW GROUP, APLC

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Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF VENTURA

ARIF AKHTAR an individual, on behalf of
himself, and on behalf of all persons similarly
situated,

Plaintiffs,

v.

AKRAYA INC., a California corporation; and
DOES 1-50, Inclusive,

Defendants.

Case No. 2023CUOE013456

**~~PROPOSED~~ ORDER GRANTING
DISMISSAL OF ENTIRE ACTION**

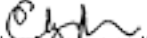
[Declaration of Shani O. Zakay, Esq. in Support
of Dismissal of Entire Action, Pursuant to
California Rule of Court 3.770 filed concurrently
herewith]

VENTURA SUPERIOR COURT

FILED

10/09/2024

Brenda L. McCormick
Executive Officer and Clerk


Elizabeth Muller

~~PROPOSED~~ ORDER

The Court, having carefully considered the Declaration of Shani O. Zakay, Esq. in Support of this dismissal, pursuant to CRC 3.770, and for good cause appearing, hereby orders as follows:

IT IS HEREBY ORDERED:

1. The Court dismisses, *without prejudice*, Plaintiff's class action claims.
2. The Court dismisses, *without prejudice*, Plaintiff's representative claim.
3. The Court dismisses, *with prejudice*, Plaintiff's individual wage and hour claims and individual PAGA claim.
4. The case is therefore dismissed in its entirety.
5. Plaintiff shall notify the Labor and Workforce Development Agency of the abandonment of Plaintiff's PAGA claims.
6. Each party bears their own fees and costs pursuant to the terms of the Settlement Agreement.

IT IS SO ORDERED.

Dated: 10/07/2024



JUDGE OF THE SUPERIOR COURT