Electronically Received 07/14/2025 06:00 PM

ATTORNEY OR PARTY WITHOUT ATTORNEY
NAME: John A. Kawai
FIRM NAME: TRIAL LAWYERS FOR JUSTICE
STREET ADDRESS: 877 S Victoria Ave, Ste 201
CITY: VENTURA STATE: CA ZIP CODE: 93003
TELEPHONE NO.: 3108553727 FAX NO.:
EMAIL ADDRESS: teamojai@tl4j.com
ATTORNEY FOR (name): Michael Garcia
STATE BAR NUMBER: 260120

FOR COURT USE ONLY
FILED
Superior Court of California
County of Los Angeles
07/14/2025
David W. Slayton, Executive Officer / Clerk of Court
By: S. Wong Deputy

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES
STREET ADDRESS: 312 N. Spring Street
MAILING ADDRESS: 312 N. Spring Street
CITY AND ZIP CODE: Los Angeles 90012
BRANCH NAME: Spring Street Courthouse

PLAINTIFF/PETITIONER: Michael Garcia
DEFENDANT/RESPONDENT: Starbucks

REQUEST FOR DISMISSAL

CASE NUMBER: 20STCV10214

A conformed copy will not be returned by the clerk unless a method of return is provided with the document.

This form may not be used for dismissal of a derivative action or a class action or of any party or cause of action in a class action. (Cal. Rules of Court, rules 3.760 and 3.770.)

1. TO THE CLERK: Please **dismiss** this action as follows:
   a. (1) [X] With prejudice (2) [ ] Without prejudice (3) [ ] Without prejudice and with the court retaining jurisdiction (Code Civ. Proc., § 664.6)
   b. (1) [ ] Complaint (2) [ ] Petition
      (3) [ ] Cross-complaint filed on *(date):* by *(name):*
      (4) [ ] Cross-complaint filed on *(date):* by *(name):*
      (5) [X] Entire action of all parties and all causes of action
      (6) [ ] Other *(specify)*:*
2. *(Complete in all cases except family law cases.)*
   The court [ ] did [X] did not waive court fees and costs for a party in this case. *(This information may be obtained from the clerk. If court fees and costs were waived, the declaration on the back of this form must be completed.)*

Date: 07/14/2025

John A. Kawai
(TYPE OR PRINT NAME OF [X] ATTORNEY [ ] PARTY WITHOUT ATTORNEY)

(SIGNATURE)

Attorney or party without attorney for
[X] Plaintiff/Petitioner [ ] Defendant/Respondent
[ ] Cross-Complainant

* If dismissal requested is of specified parties only, of specified causes of action only, or of specified cross-complaints only, so state and identify the parties, causes of action, or cross-complaints to be dismissed

3. TO THE CLERK: Consent to the above dismissal is hereby given.†
Date:

(TYPE OR PRINT NAME OF [ ] ATTORNEY [ ] PARTY WITHOUT ATTORNEY)

(SIGNATURE)

Attorney or party without attorney for
[ ] Plaintiff/Petitioner [ ] Defendant/Respondent
[ ] Cross-Complainant

† If item 1a(3) is checked, all parties must sign.
If a cross-complaint—or *Response—Marriage/Domestic Partnership* (form FL-120) seeking affirmative relief—is on file, the attorney for cross-complainant (respondent) must sign this consent if required by Code of Civil Procedure section 581(i) or (j).

[ ] Check here and use form MC-025 or a separate page for additional signatures. Include date, printed name, and party information.

4. [✓] Dismissal entered as requested on *(date):* 07/15/2025
5. [ ] Dismissal entered on *(date):* as to only *(name):*
6. [ ] Dismissal **not entered** as requested for the following reasons *(specify):*

7. a. [✓] Attorney or party without attorney notified on *(date):* 07/15/2025
   b. [ ] Attorney or party without attorney not notified. Filing party failed to provide
      [ ] a copy to be conformed [ ] means to return conformed copy

Date: 07/15/2025

David W. Slayton, Executive Officer / Clerk of Court
Clerk, by S. Wong, Deputy

Form Adopted for Mandatory Use
Judicial Council of California
CIV-110 [Rev. January 1, 2025]

Code of Civil Procedure, § 581 et seq.;
Government Code, § 68637(c); Cal. Rules of Court, rule 3.1390
www.courts.ca.gov
Westlaw Doc & Form Builder™

PLAINTIFF/PETITIONER: Michael Garcia DEFENDANT/RESPONDENT: Starbucks	CASE NUMBER: 20STCV10214

COURT'S RECOVERY OF WAIVED COURT FEES AND COSTS

If a party whose court fees and costs were initially waived has recovered or will recover $10,000 or more in value by way of settlement, compromise, arbitration award, mediation settlement, or other means, the court has a statutory lien on that recovery. The court may refuse to dismiss the case until the lien is satisfied. (Gov. Code, § 68637.)

Declaration Concerning Waived Court Fees

1. The court waived court fees and costs in this action for *(name):* NOT APPLICABLE
2. The person named in item 1 is *(check one below)*
   a. ☐ not recovering anything of value by this action.
   b. ☐ recovering less than $10,000 in value by this action.
   c. ☐ recovering $10,000 or more in value by this action. *(If item 2c is checked, item 3 must be completed.)*
3. All court fees and court costs that were waived in this action have been paid to the court *(check one):* ☐ Yes ☐ No

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

Date: 07/14/2025

John A. Kawai
(TYPE OR PRINT NAME OF ☐ ATTORNEY ☐ PARTY MAKING DECLARATION)

▶ _____
(SIGNATURE)

PROOF OF SERVICE

STATE OF CALIFORNIA, LOS ANGELES

I am employed in the County of Ventura, State of California. I am over the age of 18 and not a party to the within action. My business address is 877 S. Victoria Avenue, Suite 201, Ventura CA 93003.

On January 02, 2025, I served the foregoing document(s) described as **REQUEST FOR DISMISSAL,** on all interested parties in this action as set forth on the attached service list as follows:

☐ **BY MAIL:** I placed a true copy of the above captioned documents in a sealed envelope addressed as shown above. I deposited such envelope in the mail at Ventura, California. The envelope was mailed with postage thereon fully prepaid. I am readily familiar with the business practice at my place of business for collection and processing of correspondence for mailing with the United States Postal Service. Correspondence so collected and processed is deposited with the United States Postal Service that same day in the ordinary course of business.

☐ **BY OVERNIGHT MAIL:** By sealing the envelope and placing it for collection and overnight delivery in a box regularly maintained by an overnight delivery service with delivery fees paid or provided for in accordance with ordinary business practices.

☐ **BY PERSONAL SERVICE:** I caused such envelope to be delivered by hand to counsel for defendants.

☐ **BY ELECTRONIC TRANSFER/VIA FACSIMILE:** I caused all of the pages of the above-entitled document(s) to be sent to the recipients noted above via electronic transfer (FAX) at the respective telephone numbers indicated above.

X **BY ELECTRONIC SERVICE** Pursuant to California Code of Civil Procedure section 1010.6(e)(1), effective September 18, 2020, or an agreement of the parties to accept service by electronic transmission, I caused the document(s) to be electronically sent to the persons at the email address(es) indicated on the above list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

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

☐ FEDERAL: I declare that I am employed in the office of the member of the bar of this court at whose direction the service was made.

Executed on July 14, 2025, at Oxnard, California.

Veronica Stanwood

SERVICE LIST
Garcia vs. Starbucks Corporation, et al.
20STCV10214

Michael R. Parker, Esq.
Kenneth R. Shy, Esq.
M.R. PARKER LAW, PC
6700 Fallbrook Ave, Ste. 207
West Hills, CA 91307
Telephone: (818) 334-5711
Facsimile: (818) 394-6448
Email: michael@mrparkerlaw.com
ken@mrparkerlaw.com
daniel@mrparkerlaw.com
Attorneys for Plaintiff, MICHAEL GARCIA

Daniel B. Bidegaray. Esq.
BIDEGARAY LAW FIRM, LLC
1700 West Koch St., Suite 5
Bozeman, Montana 59715
Phone: (406) 522-7744
Fax: (406) 534-7629
Email: daniel@bidegaraylawfirm.com
Attorneys for Plaintiff, MICHAEL GARICA

Stephen T. Pelletier, Esq.
Samuel S. Baxter, Esq.
John W. Nielsen, Esq.
PRICE PELLETIER, LLP
530 "B" Street, Suite 1310
San Diego, CA 92101
Telephone (619) 349-5295
Facsimile (619) 349-5225
Email: pelletiers@pricepelletier.com
baxters@pricepelletier.com
marinom@pricepelletier.com
keownl@pricepelletier.com

LISA S. BLATT
lblatt@wc.com
RICHMOND T. MOORE
rmoore@wc.com
WILLIAMS & CONNOLLY LLP
680 Maine Ave., S.W.
Washington, DC 20024
TEL: 202.434.5000
Attorneys for Defendant, STARBUCKS CORPORATION