

KAZEROUNI LAW GROUP, APC  
245 FISCHER AVENUE, UNIT D1  
COSTA MESA, CA 92626

**KAZEROUNI LAW GROUP, APC**  
Abbas Kazerounian, Esq. (SBN: 249203)  
ak@kazlg.com  
Mona Amini, Esq. (SBN: 296829)  
mona@kazlg.com  
245 Fischer Avenue, Unit D1  
Costa Mesa, CA 92626  
Telephone: (800) 400-6808  
Facsimile: (800) 520-5523

**HYDE & SWIGART**  
Robert L. Hyde, Esq. (SBN: 227183)  
bob@westcoastlitigation.com  
Joshua B. Swigart, Esq. (SBN: 225557)  
josh@westcoastlitigation.com  
2221 Camino Del Rio South, Suite 101  
San Diego, CA 92108  
Telephone: (619) 233-7770  
Facsimile: (619) 297-1022

*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA**

**THOMAS A. TRAX,  
INDIVIDUALLY AND ON  
BEHALF OF ALL OTHERS  
SIMILARLY SITUATED,**

Plaintiff,

v.

**LIFELOCK, INC.,**

Defendant.

**Case No.: 3:15-CV-00220-MMA-WVG**

**PLAINTIFF'S NOTICE OF  
VOLUNTARY DISMISSAL  
WITHOUT PREJUDICE  
PURSUANT TO F.R.C.P. 41(A)**

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

**KAZEROUNI LAW GROUP, APC  
245 FISCHER AVENUE, UNIT D1  
COSTA MESA, CA 92626**

1 NOTICE IS HEREBY GIVEN that pursuant to Fed. R. Civ. P.  
2 41(a)(1)(A)(i), Plaintiff THOMAS A. TRAX (“Plaintiff”) hereby moves to  
3 voluntarily dismiss the above-captioned action, without prejudice as to the named  
4 Plaintiff; and without prejudice as to the claims of putative class members.

5 Defendant has neither answered Plaintiff’s Complaint, nor filed a motion for  
6 summary judgment. Accordingly, this matter may be dismissed without prejudice  
7 and without an Order of the Court. <sup>1</sup>

8  
9 Respectfully submitted,

10 Dated: May 11, 2015

**KAZEROUNI LAW GROUP, APC**

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13 BY: /s/ MONA AMINI, ESQ.  
14 ABBAS KAZEROUNIAN, ESQ.  
15 MONA AMINI, ESQ.  
16 ATTORNEYS FOR PLAINTIFF  
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27 <sup>1</sup> This dismissal is effective upon filing and does not require the Court’s approval.  
28 See Fed. R. Civ. P. 41(a)(1)(A)(i); *Commercial Space Mgmt. Co., Inc. v. Boeing Co., Inc.*, 193 F.3d 1074, 1077 (9th Cir. 1999); *Bailey v. Shell W. E&P, Inc.*, 609 F.3d 710, 719 (5th Cir. 2010).

NAZEROUNI LAW GROUP, APC  
245 FISHER AVENUE, UNIT D1  
COSTA MESA, CA 92626

**PROOF OF SERVICE**

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is Kazerouni Law Group, APC, 245 Fischer Avenue, Unit D1, Costa Mesa, CA 92626. On May 11, 2015, I served the within document(s):

**PLAINTIFF’S NOTICE OF VOLUNTARY DISMISSAL  
WITHOUT PREJUDICE PURSUANT TO F.R.C.P. 41(A)**

- FACSIMILE - by transmitting via facsimile the document(s) listed above to the fax number(s) set forth on the attached Telecommunications Cover Page(s) on this date before 5:00 p.m.
- MAIL - by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Costa Mesa, California addressed as set forth below.
- PERSONAL SERVICE - by personally delivering the document(s) listed above to the person(s) at the address(es) set forth below.
- OVERNIGHT COURIER - by placing the document(s) listed above in a sealed envelope with shipping prepaid, and depositing in a collection box for next day delivery to the person(s) at the address(es) set forth below via.
- CM/ECF - by transmitting electronically the document(s) listed above to the electronic case filing system on this date before 5:00 p.m. The Court’s CM/ECF system sends an e-mail notification of the filing to the parties and counsel of record who are registered with the Court’s CM/ECF system.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on May 11, 2015, at Costa Mesa, California.

\_\_\_\_\_  
/s/ Mona Amini  
MONA AMINI, ESQ.