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Attorneys for Plaintiff,
Michael Radashkevich

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

<p>MICHAEL RADASHKEVICH; INDIVIDUALLY AND ON BEHALF OF ALL OTHERS SIMILARLY SITUATED,</p> <p>Plaintiff,</p> <p>v.</p> <p>SUN BROTHERS, LLC – d/b/a/ SUNWARRIOR,</p> <p>Defendant.</p>	<p>Case No.: 15-cv-02887-CAB-RBB</p> <p><u>CLASS ACTION</u></p> <p>NOTICE OF REQUEST FOR VOLUNTARY DISMISSAL OF ACTION PURSUANT TO FED. R. CIV. P. 41(a)</p> <p>Judge: Hon. Cathy Ann Bencivengo</p>
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2 Plaintiff Michael Radashkevich (“Mr. Radashkevich”) hereby requests
3 dismissal of the above-captioned action against Defendant Sun Brothers, LLC -
4 d/b/a SunWarrior without prejudice as to Plaintiff’s individual claims and as to the
5 putative class claims, pursuant to Fed. R. Civ. P. 41(a). Therefore, Mr.
6 Radashkevich respectfully requests that the above-captioned action be dismissed
7 **WITHOUT PREJUDICE** as to Plaintiff’s claims and **WITHOUT PREJUDICE** as
8 to the putative class claims.
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11 Dated: January 29, 2016

Respectfully submitted,

KAZEROUNI LAW GROUP, APC

BY: /s/ ANDREI ARMAS

ANDREI ARMAS, ESQ.

ATTORNEYS FOR PLAINTIFF

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9
10 *Attorneys for Plaintiff,*
Michael Radashkevich

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

13 **MICHAEL RADASHKEVICH;**
14 **INDIVIDUALLY AND ON**
15 **BEHALF OF ALL OTHERS**
16 **SIMILARLY SITUATED,**

Case No.: 3:15-cv-02887-CAB-RBB

17 Plaintiff,

18 v.

19 **SUN BROTHERS, LLC – d/b/a/**
20 **SUNWARRIOR,**

PROOF OF SERVICE TO
NOTICE OF REQUEST FOR
VOLUNTARY DISMISSAL OF
ACTION PURSUANT TO FED. R.
CIV. P. 41(a)

21 Defendant.

22 ///

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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, 1939 Harrison Street, Suite 912, Oakland, California 94612. On January 29, 2016, I served the within document(s):

**NOTICE OF REQUEST FOR VOLUNTARY DISMISSAL
OF ACTION PURSUANT TO FED. R. CIV. P. 41(a)**

CM/ECF - by transmitting electronically the document(s) listed above to the electronic case filing system on this date before 11:59 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 January 29, 2016, at Oakland, California.

/s/ Andrei Armas
ANDREI ARMAS

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