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*Attorneys for Plaintiff,*  
Suzanne Alaei

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

SUZANNE ALAEI, Individually And On  
Behalf Of All Others Similarly Situated,

Plaintiff,

v.

THE KRAFT HEINZ FOODS  
COMPANY,

Defendant.

Case No. 3:15-cv-02961-MMA-DHB

**JOINT MOTION FOR  
DISMISSAL**

District Judge: Hon. Michael M. Anello  
Magistrate Judge: Hon. David H. Bartick

Plaintiff Suzanne Alaei (“Plaintiff”) and Defendant The Kraft Heinz Foods Company (“Defendant”) (together the “Parties”), through their counsel of record, jointly request dismissal of the action with prejudice as to Plaintiff’s individual claims and without prejudice as to the claims of the putative class members. The Parties are to bear their own fees and costs.

Therefore, the Court may proceed to dismiss the entire action with prejudice as to Plaintiff’s individual claims and without prejudice as to the claims of the putative class members.

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Dated: September 30, 2016 **KAZEROUNI LAW GROUP, APC**

By: s/ Abbas Kazerounian  
ABBAS KAZEROUNIAN  
JASON A. IBEY  
*Attorneys for Plaintiffs SUZANNE ALAEI*

Dated: September 30, 2016 **WILSON TURNER KOSMO LLP**

By: s/ Vickie E. Turner  
VICKIE E. TURNER  
MERYL C. MANEKER  
ROBERT K. DIXON  
*Attorneys for Defendant*  
THE KRAFT HEINZ FOODS COMPANY

**SIGNATURE ATTESTATION**

Pursuant to Local Rule 5.4(f) and Section 2(f)(4) of the Southern District of California’s CM/ECF Administrative Policies and Procedures Manual, I hereby certify that authorization for the filing of this document has been obtained from each of the other signatories shown above and that all signatories concur in the filing’s content.

s/ Abbas Kazerounian  
Abbas Kazerounian  
*Attorney for Plaintiff*

Kazerouni Law Group, APC  
Costa Mesa, California

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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, 245 Fischer Avenue, Suite D1, Costa Mesa, California 92626. On September 30, 2016, I served the within document(s):

**JOINT MOTION FOR DISMISSAL**

- 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 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. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on September 30, 2016, at Costa Mesa, California.

/s/ Abbas Kazerounian  
ABBAS KAZEROUNIAN