

LAW OFFICES OF RONALD A. MARRON

RONALD A. MARRON (SBN 175650)

ron@consumersadvocates.com

MICHAEL T. HOUCHIN (SBN 305541)

mike@consumersadvocates.com

LILACH HALPERIN (323202)

lilach@consumersadvocates.com

651 Arroyo Drive

San Diego, California 92103

Telephone: (619) 696-9006

Facsimile: (619) 564-6665

Attorneys for Plaintiff and the Proposed Class

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

SANDRA BROWN, on behalf of
herself, all others similarly situated, and
the general public,

Plaintiff,

v.

STARBUCKS CORPORATION, a
Washington Corporation,

Defendant.

CASE NO. 3:18-cv-02286-JM-WVG

CLASS ACTION

**NOTICE OF VOLUNTARY
DISMISSAL WITHOUT
PREJUDICE PURSUANT TO
FEDERAL RULE OF CIVIL
PROCEDURE 41(a)(1)(A)(i)**

Judge: Hon. Jeffrey T. Miller

1 **TO THE HONORABLE COURT, ALL INTERESTED PARTIES, AND**
2 **THE ATTORNEYS OF RECORD:**

3 **PLEASE TAKE NOTICE** that, pursuant to Federal Rule of Civil Procedure
4 41(a)(1)(A)(i), Plaintiff Sandra Brown, by and through her counsel of record, hereby
5 gives notice that the above captioned action is voluntarily dismissed in its entirety,
6 without prejudice against Defendant Starbucks Corporation. Defendant Starbucks
7 Corporation has not yet served an answer or a motion for summary judgment in this
8 action and therefore dismissal under Federal Rule of Civil Procedure 41(a)(1)(A)(i)
9 is appropriate.

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11
12
13 DATED: September 13, 2019

Respectfully submitted,

14 /s/ Ronald A. Marron
15 RONALD A. MARRON

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17 **RONALD A. MARRON**
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19 *ron@consumersadvocates.com*
20 MICHAEL T. HOUCHIN
21 *mike@consumersadvocates.com*
22 LILACH HALPERIN (323202)
23 *lilach@consumersadvocates.com*
24 651 Arroyo Drive
25 San Diego, California 92103
26 Telephone: (619) 696-9006
27 Facsimile: (619) 564-6665
28 ***Counsel for Plaintiff and the Proposed***
Class

1 **LAW OFFICES OF RONALD A.**
MARRON
2 RONALD A. MARRON (SBN 175650)
ron@consumersadvocates.com
3 MICHAEL T. HOUCHIN (SBN 305541)
mike@consumersadvocates.com
4 LILACH HALPERIN (SBN 323202)
lilach@consumersadvocates.com
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San Diego, California 92103
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Facsimile: (619) 564-6665

7 *Attorneys for Plaintiff and the Proposed Class*

8
9 **UNITED STATES DISTRICT COURT**
FOR THE SOUTHERN DISTRICT OF CALIFORNIA

11 SANDRA BROWN, on behalf of
12 herself, all others similarly situated,
13 and the general public,

14 Plaintiff,

15 v.

17 STARBUCKS CORPORATION, a
18 Washington Corporation,

19 Defendant.

Case No: 18-cv-2286-JM(WVG)

CERTIFICATE OF SERVICE

1 I am employed in the County of San Diego, State of California. I am over the age of
2 eighteen years and not a party to the within action. My business address is 651 Arroyo
3 Drive, San Diego, California 92103. On September 13, 2019, I served the following
4 document(s):

5 • **NOTICE OF VOLUNTARY DISMISSAL**

6 On the following:

<p>7 Kavin S. Asfour <i>kevin.asfour@klgates.com</i> Paul W. Sweeney, Jr. <i>paul.sweeney@klgates.com</i> Kate G. Hummel <i>kate.hummel@klgates.com</i> K&L Gates LLP 1011 Santa Monica Boulevard Seventh Floor Los Angeles, CA 90067 Tel: (310) 552-5000 Fax: (310) 552-5001</p>	<p>Attorneys for Defendant Starbucks Corporation</p>
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16
17 **As Indicated on Service List, by Electronic Filing and Service Pursuant to**
18 **General Order 550:** I caused the document(s) listed above via the Court’s Electronic
19 Filing System which constitutes service, pursuant to General Order 550 of the above-titled
20 Court, upon the counsel on service list.

21 **By E-service:** I served the above-entitled document(s) by e-mail as a .pdf
22 attachment.

23 **By Facsimile:** I served said document(s) to be transmitted via facsimile. The
24 telephone number of the sending facsimile machine was (619) 564-6665. The name(s)
25 and facsimile machine telephone number(s) of the person(s) served are set forth in the
26 service list. A transmission report was properly issued by the sending facsimile machine,
27 and the transmission was reported as complete and without error.

1 [] **By Mail:** I am "readily familiar" with the firm's practice of collection and
2 processing correspondence for mailing. Under that practice it would be deposited with
3 the U.S. Postal Service on the same day with postage thereon fully prepaid at San Diego,
4 California in the ordinary course of business. I am aware that on motion of the party
5 served, service is presumed invalid if postage cancellation date or postage meter date is
6 more than one day after date of deposit for mailing in affidavit.

7 [] **By Personal Delivery:** I caused such envelope to be delivered by hand to the office
8 of addressee.

9 [] **By Overnight Delivery:** I caused such envelope to be delivered by California
10 Overnight courier service and/or Federal Express for next business day delivery.

11 [X] I declare under penalty of perjury under the laws of the United States of America
12 that I am employed in the office of a member of the bar of this Court, at whose direction
13 the service was made, and that the foregoing is true and correct.

14 [] I declare under penalty of perjury under the laws of the United States of America
15 that I am a member of the Bar of this Court and that the foregoing is true and correct.

16 Executed on September 13, 2019, at San Diego, California.

17 /s/ Ronald Marron
18 Ronald A. Marron