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8 *Attorneys for Plaintiffs and the Class*

9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**

11 **ROSEMARIE RAMIREZ** and
12 **CHRISTOPHER BATES,**
13 *individually and on behalf of all*
14 *others similarly situated,*
15 Plaintiffs,
16 v.
17 **BEYOND MEAT, INC.,** a Delaware
18 Corporation,
19 Defendants.

Case No.: 2:22-cv-04404

**NOTICE OF DISMISSAL OF
ACTION WITHOUT PREJUDICE
PURSUANT TO FED R. CIV. PRO.
41(a)(1)(A)(i)**

1 **TO THE CLERK OF THE CENTRAL DISTRICT OF CALIFORNIA**
2 **AND ALL COUNSEL OF RECORD:**

3 **PLEASE TAKE NOTICE** Plaintiffs Rosemarie Ramirez and Christopher
4 Bates, pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i), notice the
5 dismissal of their Class Action Complaint against Defendant Beyond Meat, Inc.,
6 without prejudice as to Plaintiffs’ individual claims or the putative class members’
7 claims.

8 Dismissal is proper under Rule 41(a)(1)(A)(i), as Defendant has not served
9 its answer or a motion for summary judgment in this action. Indeed, Plaintiffs have
10 not yet served their complaint; therefore, Defendant has not occurred any cost in
11 this case. Additionally, Defendant has not paid Plaintiffs any compensation to
12 secure this dismissal.

13 A class has not been certified in this action; thus, this voluntary dismissal
14 does not implicate the requirements of Rule 23(e). FED. R. CIV. P. 23(e) (“The
15 claims, issues, or defenses of a certified class may be settled, voluntarily dismissed,
16 or compromised only with the court's approval.”); Committee Notes on Rule 23 –
17 2003 Amendment (“The new rule requires approval only if the claims, issues, or
18 defenses of a certified class are resolved by a settlement, voluntary dismissal, or
19 compromise.”).

20 Therefore, pursuant to Rule 41(a)(1)(A)(i), Plaintiffs may notice dismissal
21 of this case, without leave of the Court.

22
23 Dated: July 22, 2022

Respectfully submitted,

24
25 /s/ Trenton R. Kashima
Trenton R. Kashima (SBN 291405)
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Attorneys for Plaintiffs and the Class

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