

Clarkson Law Firm, P.C. | 22525 Pacific Coast Highway | Malibu, CA 90265

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CLARKSON LAW FIRM, P.C.

Ryan J. Clarkson (SBN 257074)
rclarkson@clarksonlawfirm.com
Bahar Sodaify (SBN 289730)
bsodaify@clarksonlawfirm.com
Alan Gudino (SBN 326738)
agudino@clarksonlawfirm.com
Ryan D. Ardi (SBN 348738)
rardi@clarksonlawfirm.com
22525 Pacific Coast Highway
Malibu, CA 90265
Tel: (213) 788-4050
Fax: (213) 788-4070

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

JASON KHALILI, individually and
on behalf of all others similarly
situated,

Plaintiff,

vs.

LINDT & SPRUNGLI (NORTH
AMERICA) INC., LINDT &
SPRUNGLI (USA) INC.,

Defendants.

Case No. 2:23-cv-02543-AB-AGR

Judge: Hon. Andre Birotte Jr.
Complaint Filed: April 4, 2023

**PLAINTIFF’S NOTICE OF
VOLUNTARY DISMISSAL
WITHOUT PREJUDICE PURSUANT
TO FEDERAL RULE OF CIVIL
PROCEDURE 41(a)(1)**

Clarkson Law Firm, P.C. | 22525 Pacific Coast Highway | Malibu, CA 90265

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i), Plaintiff Jason Khalili, by and through his counsel Ryan J. Clarkson, Bahar Sodaify, Alan Gudino, and Ryan D. Ardi of Clarkson Law Firm, P.C., hereby voluntarily dismisses this action without prejudice in its entirety.

Defendants Lindt & Sprungli (North America) Inc. and Lindt & Sprungli (USA) Inc. (“Defendants”) have not yet filed an answer or summary judgment in this action, therefore Defendants may be dismissed from this action without prejudice without an order from this Court.

DATED: April 18, 2023

CLARKSON LAW FIRM, P.C.

/s/ Bahar Sodaify
Ryan J. Clarkson, Esq.
Bahar Sodaify, Esq.
Alan Gudino, Esq.
Ryan D. Ardi, Esq.

Attorneys for Plaintiff