

1 CROSNER LEGAL, P.C.  
2 Michael T. Houchin (SBN 305541)  
3 mhouchin@crosnerlegal.com  
4 Craig W. Straub (SBN 249032)  
5 craig@crosnerlegal.com  
6 Zachary M. Crosner (SBN 272295)  
7 zach@crosnerlegal.com  
8 9440 Santa Monica Blvd. Suite 301  
9 Beverly Hills, CA 90210  
10 Tel: (866) 276-7637  
11 Fax: (310) 510-6429  
12 *Attorneys for Plaintiff and the Proposed*  
13 *Class*

14 **UNITED STATES DISTRICT COURT**  
15 **FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

16 KENYA NELSON, individually and on  
17 behalf of all others similarly situated,

18 Plaintiff,

19 v.

20 AMERICAN TEXTILE COMPANY,  
21 INC.,

22 Defendant.  
23  
24  
25  
26  
27  
28

Case No. 3:23-cv-01879-CAB-SBC

**NOTICE OF VOLUNTARY  
DISMISSAL WITH PREJUDICE  
PURSUANT TO FEDERAL RULE  
OF CIVIL PROCEDURE  
41(a)(1)(A)(ii)**

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiff Kenya Nelson (“Plaintiff”) and Defendant American Textile Company, Inc. (“Defendant” or “American Textile”) hereby stipulate and agree that this action shall be dismissed with prejudice as to Plaintiff’s individual claims and without prejudice as to the claims of the putative class members. Each party shall bear their own attorneys’ fees and costs.

Dated: June 24, 2024 CROSNER LEGAL, P.C.

By: /s/ Michael T. Houchin  
MICHAEL T. HOUCHIN

9440 Santa Monica Blvd. Suite  
301  
Beverly Hills, CA 90210  
Tel: (866) 276-7637  
Fax: (310) 510-6429  
mhouchin@crosnerlegal.com  
*Attorneys for Plaintiff and the  
Proposed Class*

DATED: April 30, 2024 SAUL EWING LLP

/s/ Michael J. Joyce  
MICHAEL J. JOYCE  
JAMES A. MORSCH  
DAWN B. EYERLY  
*Attorneys for Defendant,  
American Textile  
Company, Inc.*

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

**ELECTRONIC SIGNATURE CERTIFICATION**

I am the ECF user whose identification and password are being used to file the foregoing. I hereby attest that the other signatories have concurred in this filing.

Dated: June 24, 2024

CROSNER LEGAL, P.C.

By: /s/ Michael T. Houchin

---

MICHAEL T. HOUCHIN

9440 Santa Monica Blvd. Suite 301  
Beverly Hills, CA 90210  
Tel: (866) 276-7637  
Fax: (310) 510-6429  
mhouchin@crosnerlegal.com  
*Attorneys for Plaintiff and the Proposed Class*