

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): C. D. Michel (SBN: 144258) Michel & Associates, P.C. 180 East Ocean Blvd., Suite 200 Long Beach, CA 90802 TELEPHONE NO.: (562) 216-4444 FAX NO.: (562) 216-4445 E-MAIL ADDRESS: cmichel@michellawyers.com ATTORNEY FOR (Name): Danielle Jaymes, et al.	FOR COURT USE ONLY ELECTRONICALLY FILED Superior Court of California, County of San Diego 4/1/2025 4:48:41 PM Clerk of the Superior Court By E. SDCourt, Deputy Clerk
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO STREET ADDRESS: 1100 Union Street MAILING ADDRESS: 1100 Union Street CITY AND ZIP CODE: San Diego 92101 BRANCH NAME: Central Courthouse	PLAINTIFF/PETITIONER: Danielle Jaymes, et al. DEFENDANT/RESPONDENT: Nicolas Maduros
NOTICE OF ENTRY OF DISMISSAL AND PROOF OF SERVICE <input type="checkbox"/> Personal Injury, Property Damage, or Wrongful Death <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Other <input type="checkbox"/> Family Law <input type="checkbox"/> Eminent Domain <input checked="" type="checkbox"/> Other (specify): Unlimited Civil Complaint	
CASE NUMBER: 37-2024-00031147-CU-MC-CTL	

TO ATTORNEYS AND PARTIES WITHOUT ATTORNEYS: A dismissal was entered in this action by the clerk as shown on the *Request for Dismissal*. (Attach a copy completed by the clerk.)

Date: April 1, 2025

C. D. Michel

(TYPE OR PRINT NAME OF ☒ ATTORNEY ☐ PARTY WITHOUT ATTORNEY)



(SIGNATURE)

PROOF OF SERVICE

1. I am over the age of 18 and not a party to this cause. My residence or business address is:
180 East Ocean Blvd., Suite 200, Long Beach, CA 90802

2. ☐ I am a resident of or employed in the county where the mailing occurred. I served a copy of the *Notice of Dismissal* and *Request for Dismissal* by mailing them, in a sealed envelope with postage fully prepaid, as follows:
 - a. ☐ I deposited the envelope with the United States Postal Service.
 - b. ☐ I placed the envelope for collection and processing for mailing following this business's ordinary practice with which I am readily familiar. On the same day correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service.
 - c. Date of deposit: _____ d. Place of deposit (city and state): _____
 - e. Addressed as follows (name and address): _____

3. ☐ I served a copy of the *Notice of Entry of Dismissal* and *Request for Dismissal* by personally delivering copies as shown below:
 - a. Name of person served: _____
 - b. Address at which person served: _____
 - c. On (date): _____ d. At (time): _____

4. ☒ I served a copy of the *Notice of Entry of Dismissal* and *Request for Dismissal* by electronically serving copies as shown below (complete if electronic service is used based on a court order or agreement of the parties):
 - a. Name of person served: Kara Siegel; Angela K. Zugman; and Jennifer Henderson on behalf of Defendant Nicolas Maduros
 - b. Electronic service address of person served: Kara.Siegel@doj.ca.gov; Angela.Zugman@doj.ca.gov; Jennifer.Henderson@doj.ca.gov
 - c. On (date): April 1, 2025 d. At (time): _____
 - e. Electronic service address from which I served the documents: lfera@michellawyers.com
 - ☐ Proof of electronic service is attached.

5. ☐ Proof of service on additional parties is attached.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: April 1, 2025

Laura Fera



(TYPE OR PRINT NAME)

(SIGNATURE OF DECLARANT)

ATTORNEY OR PARTY WITHOUT ATTORNEY NAME: C.D. Michel FIRM NAME: Michel & Associates, P.C. STREET ADDRESS: 180 E. Ocean Blvd., Suite 200 CITY: Long Beach STATE: CA ZIP CODE: 90802 TELEPHONE NO.: (562) 216-4444 FAX NO.: (562) 216-4445 EMAIL ADDRESS: cmichel@michellawyers.com ATTORNEY FOR (name): DANIELLE JAYMES, JOSHUAH GERKEN, et al.	FOR COURT USE ONLY ELECTRONICALLY FILED Superior Court of California, County of San Diego 3/21/2025 5:29:01 PM Clerk of the Superior Court By L. McAlister , Deputy Clerk
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO STREET ADDRESS: 1100 Union Street MAILING ADDRESS: 1100 Union Street CITY AND ZIP CODE: San Diego 92101 BRANCH NAME: Central Courthouse	
PLAINTIFF/PETITIONER: DANIELLE JAYMES, JOSHUAH GERKEN, et al. DEFENDANT/RESPONDENT: NICOLAS MADUROS	
REQUEST FOR DISMISSAL	
CASE NUMBER: 37-2024-00031147-CU-MC-CTL	
A conformed copy will not be returned by the clerk unless a method of return is provided with the document.	
This form may not be used for dismissal of a derivative action or a class action or of any party or cause of action in a class action. (Cal. Rules of Court, rules 3.760 and 3.770.)	

1. TO THE CLERK: Please **dismiss** this action as follows:

- a. (1) ☐ With prejudice (2) ☒ Without prejudice (3) ☐ Without prejudice and with the court retaining jurisdiction (Code Civ. Proc., § 664.6)
- b. (1) ☐ Complaint (2) ☐ Petition
- (3) ☐ Cross-complaint filed on (date): by (name):
- (4) ☐ Cross-complaint filed on (date): by (name):
- (5) ☒ Entire action of all parties and all causes of action
- (6) ☐ Other (specify)*:

2. (Complete in all cases except family law cases.)

The court ☐ did ☒ did not waive court fees and costs for a party in this case. (This information may be obtained from the clerk. If court fees and costs were waived, the declaration on the back of this form must be completed.)

Date: March 17, 2025

C.D. Michel

(TYPE OR PRINT NAME OF ☒ ATTORNEY ☐ PARTY WITHOUT ATTORNEY)

* If dismissal requested is of specified parties only, of specified causes of action only, or of specified cross-complaints only, so state and identify the parties, causes of action, or cross-complaints to be dismissed



(SIGNATURE)

Attorney or party without attorney for

- ☒ Plaintiff/Petitioner ☐ Defendant/Respondent
☐ Cross-Complainant

3. TO THE CLERK: Consent to the above dismissal is hereby given.†

Date:

(TYPE OR PRINT NAME OF ☐ ATTORNEY ☐ PARTY WITHOUT ATTORNEY)

† If item 1a(3) is checked, all parties must sign.

If a cross-complaint—or Response—Marriage/Domestic Partnership (form FL-120) seeking affirmative relief—is on file, the attorney for cross-complainant (respondent) must sign this consent if required by Code of Civil Procedure section 581(i) or (j).

☐ Check here and use form MC-025 or a separate page for additional signatures. Include date, printed name, and party information.

4. ☒ Dismissal entered as requested on (date): **3/21/2024**
5. ☐ Dismissal entered on (date): as to only (name):
6. ☐ Dismissal **not entered** as requested for the following reasons (specify):

7. a. ☒ Attorney or party without attorney notified on (date): **4/1/2025**
- b. ☐ Attorney or party without attorney not notified. Filing party failed to provide
☐ a copy to be conformed ☐ means to return conformed copy

Date: **4/1/2025**

Clerk, by



, Deputy

L. McAlister

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PLAINTIFF/PETITIONER: DANIELLE JAYMES, JOSHUAH GERKEN, et al.
DEFENDANT/RESPONDENT: NICOLAS MADUROS

CASE NUMBER:
37-2024-00031147-CU-MC-CTL

COURT'S RECOVERY OF WAIVED COURT FEES AND COSTS

If a party whose court fees and costs were initially waived has recovered or will recover \$10,000 or more in value by way of settlement, compromise, arbitration award, mediation settlement, or other means, the court has a statutory lien on that recovery. The court may refuse to dismiss the case until the lien is satisfied. (Gov. Code, § 68637.)

Declaration Concerning Waived Court Fees

1. The court waived court fees and costs in this action for *(name)*:
2. The person named in item 1 is *(check one below)*
 - a. ☐ not recovering anything of value by this action.
 - b. ☐ recovering less than \$10,000 in value by this action.
 - c. ☐ recovering \$10,000 or more in value by this action. *(If item 2c is checked, item 3 must be completed.)*
3. All court fees and court costs that were waived in this action have been paid to the court *(check one)*: ☐ Yes ☐ No

I declare under penalty of perjury under the laws of the State of California that the information above is true and correct.

Date:

(TYPE OR PRINT NAME OF ☐ ATTORNEY ☐ PARTY MAKING DECLARATION)



(SIGNATURE)