

1 Tarek H. Zohdy (Cal. Bar. No. 247775)
Tarek.Zohdy@capstonelawyers.com
2 Cody R. Padgett (Cal. Bar. No. 275553)
Cody.Padgett@capstonelawyers.com
3 Laura E. Goolsby (Cal Bar No. 321721)
Laura.Goolsby@capstonelawyers.com
4 CAPSTONE LAW APC
1875 Century Park East, Suite 1000
5 Los Angeles, CA 90067

6 James C. Shah (SBN 260435)
MILLER SHAH, LLP
7 1230 Columbia Street, Ste. 1140
San Diego, CA 92101
8 Telephone: 619-235-2416
Facsimile: 866-300-7367
9 jcshah@millershah.com

10 Norberto J. Cisneros (Cal. Bar No. 182001, NV Bar No. 8782)
Barbara McDonald (Cal. Bar. No. 281722, NV Bar No. 11651)
11 MADDOX & CISNEROS, LLP
3230 S. Buffalo Drive, Suite 108
12 Las Vegas, NV 89117

13 [Additional Counsel on Signature Page]

14 *Attorneys for Plaintiff*

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

17 MINERVA MARTINEZ,
18 individually, and on behalf of a class
of similarly situated individuals,

19 Plaintiff,

20 v.

21 NISSAN NORTH AMERICA INC.,
22 a Delaware corporation,

23 Defendant.

Case No. 3:21-cv-02146-L-DEB

**NOTICE OF VOLUNTARY
DISMISSAL**

24
25 Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(i), this matter is dismissed without
26 prejudice as to Plaintiff’s claims and without attorneys’ fees or costs to any party.
27
28

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

Dated: May 16, 2022

/s/ Tarek H. Zohdy
Tarek H. Zohdy (Cal. Bar. No. 247775)
Cody R. Padgett (Cal. Bar. No. 275553)
Laura E. Goolsby (Cal Bar No. 321721)
CAPSTONE LAW APC
1875 Century Park East, Suite 1000
Los Angeles, CA 90067
Tarek.Zohdy@capstonelawyers.com
Cody.Padgett@capstonelawyers.com
Laura.Goolsby@capstonelawyers.com

James C. Shah (SBN 260435)
MILLER SHAH, LLP
1230 Columbia Street, Ste. 1140
San Diego, CA 92101
Telephone: 619-235-2416
Facsimile: 866-300-7367
jcshah@millershah.com

Natalie Finkelman Bennett (*Admitted PHV*)
MILLER SHAH LLP
1845 Walnut Street
Philadelphia, PA 19103
Telephone: 866-540-5505
Facsimile: 866-300-7367
nfinkelman@millershah.com

Norberto J. Cisneros (Cal. Bar No. 182001)
Barbara McDonald (Cal. Bar. No. 281722)
MADDOX & CISNEROS, LLP
3230 S. Buffalo Drive, Suite 108
Las Vegas, NV 89117

Melissa S. Weiner (*Admitted PHV*)
PEARSON, SIMON & WARSHAW, LLP
800 LaSalle Avenue, Suite 2150
Minneapolis, MN 55402
Telephone: 612-389-0600
Facsimile: 612-389-0610
mweiner@pswlaw.com

Attorneys for Plaintiff

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

CERTIFICATE OF SERVICE

I hereby certify that on May 16, 2022, the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court’s electronic filing system. Parties may access this filing through the Court’s system.

/s/Tarek H. Zohdy
Tarek H. Zohdy