

1 Robert G. Klein, Esq.
2 LAW OFFICES OF ROBERT G. KLEIN
3 555 West 5th Street, 31st Floor
4 Los Angeles, CA 90013
5 (213) 996-8508
6
7 Attorneys for Plaintiff, RAYMUNDO ORTEGA

FILED
LOS ANGELES SUPERIOR COURT

JAN 29 2008

JOHN A. CLARKE, CLERK
V. S.
BY VICTOR E. SINO-CRUZ, DEPUTY

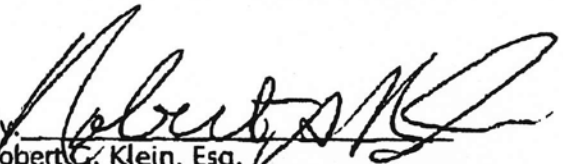
8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 IN AND FOR THE COUNTY OF LOS ANGELES, CENTRAL DISTRICT
10 UNLIMITED CIVIL CASE

11 RAYMUNDO ORTEGA, an individual,)	Case No.: BC372753
)	
12 Plaintiff,)	[The Honorable Michael L. Stern
)	Department "62"]
13 vs.)	
)	
14 LINDSAY LOHAN, an individual;)	PLAINTIFF'S WITHDRAWAL OF
CROSSHEART PRODUCTIONS, INC.; L.A.)	COMPLAINT FILED AGAINST THE
15 DESSERTS, INC. dba THE IVY, a business)	IVY
entity of unknown form; and DOES 1)	
16 through 100, inclusive,)	
)	
17 Defendants.)	

18
19 COMES NOW, plaintiff, RAYMUNDO ORTEGA, and withdraws all allegations
20 made by plaintiff against L.A. DESSERTS, INC. dba THE IVY in the above-referenced
21 matter.

22 Dated: January 22, 2008

LAW OFFICES OF ROBERT G. KLEIN

23
24
25 By 
26 Robert G. Klein, Esq.
Attorneys for Plaintiff, RAYMUNDO ORTEGA

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WITHDRAWAL OF COMPLAINT AGAINST THE IVY

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PROOF OF SERVICE

(Cal.Civ.Proc. Code §1013a)

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action; my business address is 20920 Warner Center Lane, Suite B, Woodland Hills, California 91367.

On January 28, 2008, I served the foregoing document described as **PLAINTIFF'S WITHDRAWAL OF COMPLAINT FILED AGAINST THE IVY** on parties therein in this action by placing a true copy thereof enclosed in a sealed envelope as follows:

Robert G. Klein, Esq.
LAW OFFICES OF ROBERT G. KLEIN
555 West 5th Street, 31st Floor
Los Angeles, CA 90013

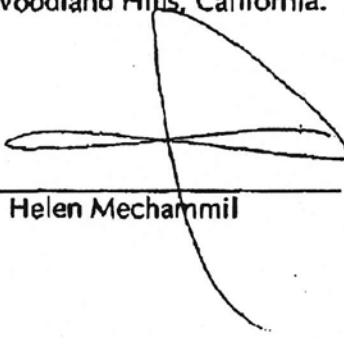
Attorneys for Cross-Defendant,
Raymundo Ortega
Brian G. Hummel, Esq.
GOMES, HIRSHIK & HUMMEL
16815 Von Karman, Suite 250
Irvine, CA 92606
(949) 930-6176
(949) 930-6101

Mark Williams, Esq.
Alfred W. Gerisch, Jr., Esq.
LA FOLLETTE, JOHNSON, DE HAAS,
FESLER & AMES
865 South Figueroa Street, 31st Floor
Los Angeles, CA 90017

I am familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice, it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Woodland Hills, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in affidavit.

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

Executed on January 28, 2008, at Woodland Hills, California.



Helen Mechammil

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name and Address): Robert G. Klein, Esq. LAW OFFICES OF ROBERT G. KLEIN 555 West 5th Street, 31st Floor Los Angeles, CA 90013	TELEPHONE NO.: (213) 996-8508 FOR COURT USE ONLY REC'D FILED LOS ANGELES SUPERIOR COURT JAN 29 2008 FLING WINDOW JAN 29 2008 JOHN A. CLARKE, CLERK <i>M. Carrillo</i> BY M. Carrillo, DEPUTY
ATTORNEY FOR (Name): PLAINTIFF, RAYMUNDO ORTEGA Insert name of court and name of judicial district and branch court, if any: LOS ANGELES SUPERIOR COURT CENTRAL DISTRICT	CASE NUMBER BC372753 <i>D62</i>
PLAINTIFF/PETITIONER: RAYMUNDO ORTEGA, an individual, DEFENDANT/RESPONDENT: LINDSAY LOHAN, an individual; CROSSHEART PRODUCTIONS, INC.; THE IVY, a business entity of unknown form; and DOES 1 through 100,	
REQUEST FOR DISMISSAL <input checked="" type="checkbox"/> Personal Injury, Property Damage, or Wrongful Death <input checked="" type="checkbox"/> Motor Vehicle <input type="checkbox"/> Other <input type="checkbox"/> Family Law <input type="checkbox"/> Eminent Domain <input type="checkbox"/> Other (specify):	

- A conformed copy will not be returned by the clerk unless a method of return is provided with the document. -

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

- a. (1) With prejudice (2) Without prejudice
- b. (1) Complaint (2) Petition
 (3) Cross-complaint filed by (name):
 (4) Cross-complaint filed by (name):
 (5) Entire action of all parties and all causes of action
 (6) Other (specify):* COMPLAINT FILED AGAINST DEFENDANT, THE IVY ONLY.

on (date):
on (date):

Date:

Robert G. Klein, Esq.

(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.

LAW OFFICES OF ROBERT G. KLEIN

Robert G. Klein
(SIGNATURE)
Attorney or party without attorney for: RAYMUNDO ORTEGA, an individual

Plaintiff/Petitioner Defendant/Respondent
 Cross-complainant

2. TO THE CLERK: Consent to the above dismissal is hereby given.**

Date:

(TYPE OR PRINT NAME OF ATTORNEY PARTY WITHOUT ATTORNEY)

** If a cross-complaint or Response (Family Law) 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(f) or (j).

(SIGNATURE)
Attorney or party without attorney for:

Plaintiff/Petitioner Defendant/Respondent
 Cross-complainant

(To be completed by clerk)

3. Dismissal entered as requested on (date): **JAN 29 2008**
4. Dismissal entered on (date): as to only (name):
5. Dismissal not entered as requested for the following reasons (specify):
6. a. Attorney or party without attorney notified on (date):
 b. Attorney or party without attorney not notified. Filing party failed to provide
 a copy to conform means to return conformed copy

Date:

JAN 29 2008

JOHN A. CLARKE

Clerk, by *M. Carrillo*, Deputy

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On January 28, 2008, I served the foregoing document described as **REQUEST FOR DISMISSAL** on parties therein in this action by placing a true copy thereof enclosed in a sealed envelope as follows:

Robert G. Klein, Esq.
LAW OFFICES OF ROBERT G. KLEIN
555 West 5th Street, 31st Floor
Los Angeles, CA 90013

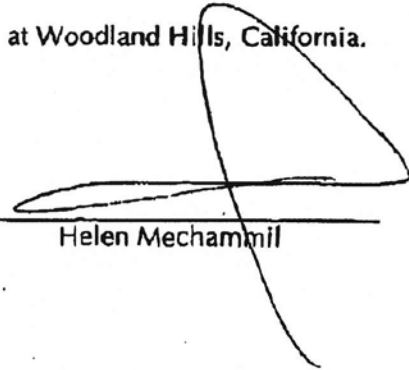
Attorneys for Cross-Defendant,
Raymundo Ortega
Brian G. Hummel, Esq.
GOMES, HIRSHIK & HUMMEL
16815 Von Karman, Suite 250
Irvine, CA 92606
(949) 930-6176
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Mark Williams, Esq.
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LA FOLLETTE, JOHNSON, DE HAAS,
FESLER & AMES
865 South Figueroa Street, 31st Floor
Los Angeles, CA 90017

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Executed on January 28, 2008, at Woodland Hills, California.



Helen Mechammil