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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES
CENTRAL CIVIL WEST**

IN RE: TV WRITERS CASES

[Assigned to Hon. Emilie H. Elias for all purposes]

THIS DOCUMENT RELATES TO:

CASE NO. BC 268 836

Ruben, et al. v. Creative Artists Agency, LLC,
Case No. BC 268879;

**NOTICE OF DISMISSAL OF CERTAIN
CLAIMS WITH PREJUDICE**

This document shall be filed within 7 days of the Effective Date.

NOTICE OF DISMISSAL OF CLAIMS WITH PREJUDICE

Plaintiffs hereby dismiss, with prejudice, any claim that Defendant (i) was a joint employer with, or aided and abetted, any Released Person¹ in age discrimination, (ii) or that a

¹ The term Released Person shall have the same meaning set forth in the Settlement Agreements filed in Alch, et al. v. Time Warner Entertainment Company, L.P., et al., Case No. BC 268836; Bast, et al. v. Fox Entertainment Group, Inc., et al., Case No. BC 268839; Levy, et al., v. The Gersh Agency, Inc., Case No. BC 268 840; Brett, et al. v. The Walt Disney Company, et al., Case No. BC 268844; Brooks, et al. v. William Morris Agency, Inc., Case No. BC 268843; Distefano, et al. v. Columbia Tristar Television, Inc., Case No. BC 268845; Eisenson, et al., v. Lucy Stille

Released Person aided and abetted age discrimination by Defendant or any other Released Person, or (iii) is liable for failing to take reasonable steps to prevent age discrimination, if any, from occurring at a Released Person.

This dismissal with prejudice does not (a) preclude Plaintiffs from offering evidence for a purpose other than to prove the aforementioned dismissed claims, (b) preclude Plaintiffs from asserting and arguing that Defendant failed to take reasonable steps to prevent talent agents in its employ from discriminating against Plaintiffs on the basis of age in direct violation of the California Fair Employment & Housing Act, and/or (c) release any claim – or preclude Plaintiffs from seeking to introduce any evidence in prosecuting a claim against Defendant – for failure to represent, refer or otherwise adequately represent any writer in connection with any position or Work in direct violation of California’s Unruh Act.

Dated: _____, 2010

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& Associates, Inc., d/b/a Paradigm Talent & Literary Agency, et al., Case No. BC 268 847; Lang, et al., v. Shapiro-Lichtman, Inc., d/b/a Shapiro-Lichtman-Stein, Case No. BC 268 848; Neal, et al., v. The Endeavor Agency, Inc., Case No. BC 268 849; Edwards, et al. v. The Carsey-Werner Company, et al., Case No. BC 268841; Kalish, et al. v. Viacom Inc., et al., Case No. BC 268883; Kinghorn, et al. v. Universal Studios, Inc., et al., Case No. BC 268877; Moriarty, et al. v. Viacom Inc., et al., Case No. BC 268878; Yanok, et al., v. Agency for the Performing Arts, Inc., Case No. BC 268 880; Schwartz, et al., v. United Talent Agency, Inc., Case No. BC 268 881; Neal, et al. v. Viacom Inc., et al., Case No. BC 268837; Shayne, et al. v. Viacom Inc. amd CBS Broadcasting, Inc., Case No. BC268882; Wynn, et al. v. National Broadcasting Company, Inc., et al., Case No. BC 268842; and Young, et al. v. DreamWorks SKG TV, LLC, Case No. BC 268838.

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