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**BEFORE THE HEARING EXAMINER  
CITY OF SEATTLE**

In the Matter of the Appeals of  
Baja Concrete USA Corp., Newway  
Forming Inc., and Antonio  
Machado,  
From a Final Order of the Director,  
City of Seattle Office of Labor  
Standards, Respondent.

Hearing Examiner Files:  
LS-21-002, LS-21-003, LS-21-004  
(consolidated)

**NOTICE OF INTENT TO WITHDRAW**

**CR 71(c)**

Department Reference: 2020-00186-LS

TO: HEARING EXAMINER, CITY OF SEATTLE; and

AND TO: ALL COUNSEL AND PARTIES OF RECORD

MDK Law, Mark D. Kimball and Alex T. Larkin hereby give notice pursuant to  
CR 71(c) of intent to withdraw as counsel for Appellant Baja Concrete USA Corp., effective  
October 28, 2022, without order of court or the Hearing Examiner unless an objection thereto is  
served on the undersigned prior to said date.

The names and addresses of the parties for whom this Notice applies are as follows:

Claudia Penunuri  
Baja Concrete USA Corp.  
12736 SW 133<sup>rd</sup> St.  
Miami, FL 33186

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DATED: October 13, 2022

/s/ Mark D. Kimball  
Mark D. Kimball, WSBA # 13146  
MDK Law  
777 108<sup>th</sup> Avenue N.E., Ste. 2000  
Bellevue, WA 98004  
Phone: (425) 455-9610  
Email: mkimball@mdklaw.com

DATED: October 13, 2022

/s/ Alex T. Larkin  
Alex T. Larkin, WSBA #36613  
MDK Law  
777 108<sup>th</sup> Avenue N.E., Ste. 2000  
Bellevue, WA 98004  
Phone: (425) 455-9610  
Email: alarkin@mdklaw.com

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**CERTIFICATE OF SERVICE**

I certify that on October 13, 2022, I caused to be served two copies (one via certified mail, postage prepaid, and one via First Class United States Postal Service Mail, postage prepaid) of the foregoing Notice of Intent to Withdraw upon:

Claudia Penunuri  
Baja Concrete USA Corp.  
12736 SW 133<sup>rd</sup> St.  
Miami, FL 33186

Signed at Bellevue, Washington, this 13<sup>th</sup> day of October, 2022.

/s/ Mark N. Niehoff  
Mark N. Niehoff, Paralegal