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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN JOAQUIN**

MARIA SANCHEZ, as an individual and
on behalf of all others similarly situated,

Plaintiffs,

vs.

LODI MEMORIAL HOSPITAL
ASSOCIATION, INC., a California
corporation; ADVENTIST HEALTH
SYSTEM/WEST, a California corporation;
and DOES 1 through 50, inclusive,

Defendants.

Case No.: STK-CV-UOE-2019-09557

(Assigned to the Hon. Roger Ross, Dept. 11B)

**DECLARATION OF MAX GAVRON IN
SUPPORT OF PLAINTIFFS' MOTION TO
APPROVE SETTLEMENT AGREEMENT
PURSUANT TO THE PRIVATE ATTORNEYS
GENERAL ACT**

Date: November 3, November 4, November 5,
November 6, or November 10, 2020

Time: 9:00 a.m.

Dept.: 11B

Complaint Filed: July 24, 2019

FAC Filed: October 10, 2019

SAC Filed: August 28, 2020

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I, Max Gavron, declare as follows:

1. I am an attorney at law, duly licensed to practice before all Courts in the State of California, and am with the law firm Diversity Law Group, P.C., counsel of record for Plaintiff Maria Sanchez, Eric Ridgeway, Michelle Bueno, Cindy Javier, Deborah Patterson, Monica Barajas, and Mary Gallegos (collectively, “Plaintiffs”). I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. From the inception of the case, Plaintiffs' Counsel have zealously represented the interests of Plaintiffs and the PAGA Members.

3. I strongly believe that Plaintiffs can prevail at trial. However, I also believe in the fairness of the settlement. After taking into account sharply disputed factual and legal issues involved in this litigation, the risks attending further prosecution, and the substantial benefits to be received pursuant to the compromise and settlement of the litigation, I have concluded that settlement on the terms set forth in the PAGA Representative Action Settlement Agreement and Release (“Settlement Agreement”) is appropriate and in the best interests of Plaintiff and the aggrieved employees.

4. My qualifications are as follows: I received a full-tuition scholarship, and graduated from Southwestern Law School in 2013, magna cum laude. I was in the top 5% of my class. During my time at Southwestern, I was a Notes and Comments Editor on the Southwestern Law Review. I also received awards for achieving the highest grade in my class in several courses. In 2012, I was a full-time extern, at the United States District Court for the Central District. Immediately after law school, I taught several courses at Southwestern, including Principles of Legal Analysis and Legal Methods. I taught those courses for approximately four years.

5. I practiced civil litigation at Haight Brown & Bonesteel LLP from approximately September 2013, through January 2016. I was third-chair in a federal court jury trial that resulted in a defense verdict in our client's favor on a \$21 million commercial breach of contract dispute. I also regularly litigated cases across the civil litigation spectrum, including employment matters.

1 6. From February 2016, through Fall 2017, I practiced at the international law firm
2 of Arnold & Porter, which had recently merged with Kaye Scholer, LLP. I defended Fortune 50
3 companies in Multi-District Litigation primarily in the product liability sphere. I also
4 successfully drafted an appellate brief in the Ninth Circuit resulting in the reversal of a summary
5 judgment decision regarding trade secret issues, in addition to working in several other practice
6 groups.

7 7. From September 2017, through September 2017, I served as a law clerk to a
8 Judge sitting on the United States District Court, Central District of California. I regularly
9 prepared bench memoranda, on cases involving all types of civil litigation, including regularly
10 working on wage and hour class actions.

11 8. I am currently an associate at the law firm Diversity Law Group, P.C., an
12 employment law firm that has handled numerous wage and hour class and individual actions, on
13 both plaintiff and defense sides. My current practice focuses on employment matters involving
14 both class actions, and single plaintiffs. The firm currently has cases in the Los Angeles Superior
15 Courts, the Orange County Superior Courts, the San Diego County Superior Courts, and the
16 United States District Courts for the Central, Northern, and Eastern Districts of California. I am
17 currently handling numerous wage and hour class action lawsuits with the firm, including, but
18 not limited to: *Agar v. Sensient Natural Ingredients, LLC* (Case No. CV-19-001906, Stanislaus
19 County Superior Court); *Cunningham, et al. v. Diverse Business Solutions* (Case No.
20 CIVDS1817095, San Bernardino County Superior Court); *Heredia v. Eddie Bauer LLC* (Case
21 No. 16CV300475, United States District Court, Northern District of California); *Parsons v.*
22 *Estenson Logistics, LLC* (Case No. 34-2019-00252929, Sacramento County Superior Court);
23 *Wood v. Reeve Trucking Co., Inc.* (Case No. STK-CV-UOE-2018-0004414, San Joaquin County
24 Superior Court); and *Coronel v. Pinnacle Agriculture* (Case No. 18CV004287, Monterey County
25 Superior Court).

26 9. On June 14, 2019, I argued two related cases in front of the Ninth Circuit Court of
27 Appeals. One of them was *Rodriguez v Nike Retail Service Inc.*, Case No. 17-16866. On June
28 28, 2019, the Ninth Circuit issued a published decision, reversing and remanding in favor of our

1 clients. *Rodriguez v. Nike Retail Servs., Inc.*, 928 F.3d 810 (9th Cir. 2019).

2 10. I have also assisted the firm in numerous wage and hour class action mediations.

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

5 Executed on this 5th day of October 2020, at Los Angeles, California.

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