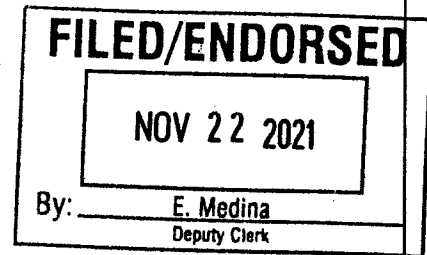


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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SACRAMENTO**

EDWARD ALCANTAR, as an individual
and on behalf of all others similarly situated,

Plaintiffs,

vs.

AEROJET ROCKETDYNE, INC., an Ohio
corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No.: 31-2020-00281224

**DECLARATION OF MAX W. GAVRON IN
SUPPORT OF PLAINTIFF'S MOTION FOR
FINAL APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: December 16, 2021
Time: 9:00 a.m.
Dept.: 54

Complaint Filed: June 29, 2020
FAC Filed: July 12, 2021

BY FAX

DECLARATION OF MAX W. GAVRON

I, Max W. Gavron, declare as follows:

1. I am an attorney at law duly admitted to practice before all courts in the State of California and am a member of the law firm of the Diversity Law Group, P.C., one of the attorneys of record for Plaintiff Edward Alcantar (“Plaintiff”) in the above-entitled action. I have personal knowledge of the matters set forth herein, and if called upon as a witness to testify thereto, I could and would competently do so.

2. The Notice of Class Action Settlement (“Settlement Class Notice”) provided Class Members with my office’s contact information, where they could further seek information regarding the class settlement, leave questions for the Settlement Administrator, and update their address.

3. There were no objections to the amount of attorneys’ fees or litigation costs that Class Counsel seek in this case and for which Plaintiff asks the Court for final approval.

4. The Settlement Agreement and Release (“Settlement Agreement”) was the product of negotiation between highly able and experienced attorneys on both sides who possessed the relevant data and extensive legal research which they had carefully analyzed. Class Counsel engaged in extensive factual investigation before settling, including the exchange of informal discovery. Defendant represented that it employed approximately 382 Class Members during the Settlement Class Period (April 6, 2019 through September 10, 2020). Defendant further provided the number of payroll periods during which Class Members earned shift differential wages and/or additive pay during the Settlement Class Period. Using the data provided by Defendant, I performed a comprehensive damages analysis, and negotiated the settlement amount based on a clear understanding of the maximum exposure in this case, as explained more fully in Plaintiff’s Motion for Preliminary Approval.

5. The settlement in the case at bar warrants approval and carries a presumption of fairness. As previously noted in the application for Preliminary Approval, this current settlement was negotiated at arm’s length. I support the settlement as fair, reasonable, and adequate, and in the best interest of the Class Members as a whole.

1 6. My firm has a great deal of experience in wage and hour class action litigation
2 and has been approved as class counsel in a number of class actions.

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

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

15 9. From February 2016, through Fall 2017, I practiced at the international law firm
16 of Arnold & Porter, which had recently merged with Kaye Scholer, LLP. I defended Fortune 50
17 companies in Multi-District Litigation primarily in the product liability sphere. I also
18 successfully drafted an appellate brief in the Ninth Circuit resulting in the reversal of a summary
19 judgment decision regarding trade secret issues, in addition to working in several other practice
20 groups. *See Experian Info. Solutions v. Nationwide Marketing Servs. Inc.*, 893 F.3d 1176 (9th
21 Cir. 2018).

22 10. From September 2017, through September 2018, I served as a law clerk to a
23 Judge sitting on the United States District Court, Central District of California. I regularly
24 prepared bench memoranda, on cases involving all types of civil litigation, including regularly
25 working on wage and hour class actions.

26 11. I am currently an attorney at the law firm Diversity Law Group, P.C., an
27 employment law firm that has handled numerous wage and hour class and individual actions, on
28 both plaintiff and defense sides. My current practice focuses on employment matters involving

1 both class actions, and single plaintiffs. The firm currently has cases in the Los Angeles Superior
2 Courts, the Orange County Superior Courts, the San Diego County Superior Courts, and the
3 United States District Courts for the Central, Northern, and Eastern Districts of California. I am
4 currently handling, or have handled, numerous wage and hour class action lawsuits with the firm,
5 including, but not limited to: *Agar v. Sensient Natural Ingredients, LLC* (Case No. CV-19-
6 001906, Stanislaus County Superior Court); *Heredia v. Eddie Bauer LLC* (Case No.
7 16CV300475, United States District Court, Northern District of California); *Parsons v. Estenson*
8 *Logistics, LLC* (Case No. 34-2019-00252929, Sacramento County Superior Court); *Wood v.*
9 *Reeve Trucking Co., Inc.* (Case No. STK-CV-UOE-2018-0004414, San Joaquin County Superior
10 Court); *Coronel v. Pinnacle Agriculture* (Case No. 18CV004287, Monterey County Superior
11 Court), and *Tice v. Trader Joe's Company* (Case No. 20CV00892, Santa Barbara County
12 Superior Court), among others.

13 12. I have been certified as class counsel in a number of cases, including *Smith v.*
14 *Gold Country Health Center, Inc.* (Case No. PC20180491, El Dorado County Superior Court)
15 and *Pantoja v. RAMCO Enterprises, L.P.* (Case No. M126835, Monterey County Superior
16 Court). I have also assisted in numerous wage and hour class action mediations.

17 13. On June 14, 2019, I argued two related cases in front of the Ninth Circuit Court of
18 Appeals. One of them was *Rodriguez v Nike Retail Service Inc.*, Case No. 17-16866. On June
19 28, 2019, the Ninth Circuit issued a published decision, reversing and remanding in favor of our
20 clients. *Rodriguez v. Nike Retail Servs., Inc.*, 928 F.3d 810 (9th Cir. 2019). The related case
21 decision was *Chavez v. Converse, Inc.*, 772 Fed.Appx. 571 (June 28, 2019).

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

24 Executed on this 22nd day of November 2021, at Los Angeles, California.

25 

26 _____
27 Max W. Gavron
28