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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF VENTURA

CHRISTIANE LANGE APPLGATE, as
an individual and on behalf of all others
similarly situated,

Plaintiff,

vs.

SEED BEAUTY, LLC, a California
limited liability company; COLOUR POP
DISC COMPANY, a California
corporation; and DOES 1 through 50,
inclusive,

Defendants.

Lead Case No.: 56-2021-00555658-CU-OE-VTA
(Consolidated with 56-2021-00556344-CU-OE-
VTA & 56-2021-00560437-CU-OE-VTA)

(Assigned for all purposes to the Hon. Benjamin F.
Coats, Department 43)

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

Date: April 3, 2024
Time: 8:30 a.m.
Dept.: 43

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I, Max W. 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, counsel of record for Plaintiff Christiane Lange Applegate (“Plaintiff”). 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, Plaintiff's counsel have zealously represented the interests of the aggrieved employees. The settlement was obtained for the benefit of the aggrieved employees, as opposed to the individual Plaintiff.

3. I strongly believe that Plaintiff can prevail at trial. However, I also believe in the fairness of the settlement, which is based on factoring in the inherent risks in drawn-out litigation, as well as the possibility of appeals.

4. After taking into account sharply disputed factual and legal issues involved in this litigation, the risks attending further prosecution, including the still-developing law under PAGA, 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 Joint Stipulation of Settlement and Release of PAGA Claims (“Settlement Agreement” or “Settlement”) is appropriate and in the best interests of Plaintiff and the aggrieved employees.

5. 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.

6. 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

1 in a defense verdict in our client's favor on a \$21 million commercial breach of contract dispute.
2 I also regularly litigated cases across the civil litigation spectrum, including employment matters.

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

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

13 9. I am currently an associate at the law firm Diversity Law Group, P.C., an
14 employment law firm that has handled numerous wage and hour class and individual actions, on
15 both plaintiff and defense sides. My current practice focuses on employment matters involving
16 both class actions, and single plaintiffs. The firm currently has cases in the Los Angeles Superior
17 Courts, the Orange County Superior Courts, the San Diego County Superior Courts, and the
18 United States District Courts for the Central, Northern, and Eastern Districts of California. I am
19 currently handling, or have handled, numerous wage and hour class action lawsuits with the firm,
20 including, but not limited to: *Agar v. Sensient Natural Ingredients, LLC* (Case No. CV-19-
21 001906, Stanislaus County Superior Court); *Heredia v. Eddie Bauer LLC* (Case No.
22 16CV300475, United States District Court, Northern District of California); *Parsons v. Estenson*
23 *Logistics, LLC* (Case No. 34-2019-00252929, Sacramento County Superior Court); and *Rodas v.*
24 *Goodyear Tire* (Case No. 21-cv-07526, United States District Court, Central District of
25 California), among many others.

26 10. 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 11. 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 11th day of March 2024, at Los Angeles, California.

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