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Attorneys for Plaintiff and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SONOMA

THALIA MARAVILLA, as an individual
and on behalf of all others similarly
situated,

Plaintiff,

vs.

LCS COMMUNITY EMPLOYMENT
LLC, an Iowa limited liability company;
and DOES 1 through 50, inclusive,

Defendants.

Case No.: SCV-270452

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

Date: March 12, 2025

Time: 3:00 p.m.

Dept.: 17

Complaint Filed: March 23, 2020

Trial Date: None

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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 Thalia Maravilla (“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 competently do so.

3. To date, I have incurred approximately 46.2 hours in connection with the litigation of this lawsuit. Attached as **Exhibit 1** is a true and correct copy of a summary of the hours worked on this action.

4. The total lodestar for my hours will be approximately \$32,340 based on an hourly rate of \$700.00 per hour (46.20 hours x \$700.00 per hour). In 2025, I increased my hourly rate to \$700. I have been approved at this rate in *Abernathy v. Deacon Construction, LLC*, Santa Clara County Superior Court Case No. 20CV367327 (February 10, 2025). Since January 2024, I have been approved at the rate of \$650.00 per hour. I was approved at this rate in *Jaramillo v. USS-UPI, LLC*, Contra Costa County Case No. C22-00641 (April 24, 2024), *Conner v Red Wing Brands of America, Inc.*, San Mateo County Case No. 22CIV03830 (August 12, 2024), and *Buford, et al. v. Estenson Logistics, LLC, et al.*, San Bernardino County Case No. CIVSB2133332 (October 23, 2024). Starting January 2025, I increased my rate to \$700 per hour. Prior to that, I have been approved at \$600.00 per hour in *Weybrew v. BEI Construction*, Solano County Superior Court Case No. FCS055658 (January 14, 2022), *In re See's Candies Wage and Hour Cases*, Case No. JCCP5004

(March 30, 2022), Los Angeles Superior Court, *Pevey v. Lumber City Corp*, San Bernardino County Superior Court Case No. CIVDS2010240 (May 2, 2022), *Ross v Stater Bros. Markets*, San Bernardino County Superior Court Case No. CIVDS1902518 (September 8, 2022), and *Schneider v. Amazon Retail LLC*, Los Angeles County Superior Court Case No. 21STCV26226 (December 1, 2022). Prior to that throughout 2020 and 2021, I was approved at an hourly rate of at \$550.00 per hour in *James v RADC Enterprises, Inc.*, San Bernardino County Superior Court, Case No. CIV-DS1933035 (September 29, 2020), *Hector Luna v. Triple Canopy, Inc.*, Santa Clara County Superior Court, Case No. 19CV345169 (October 22, 2020), *Melbert Magpugay v. Harbor Electronics, Inc.*, Santa Clara County Superior Court Case No. 19CV352547 (January 27, 2021), *Foster v. Schindler Elevator Corp.*, Alameda County Superior Court Case no. RG19029640 (March 2, 2021), *Martin v. Streetplus Company, LLC, et al*, Los Angeles Superior Court Case No. 19STCV15522 (July 13, 2021), *Morris v. Blue Mountain Enterprises, LLC*, Solano County Superior Court, Case No. FCS05858 (August 4, 2021).

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 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.

7. From February 2016, through Fall 2017, I practiced at the international law firm of Arnold & Porter, which had recently merged with Kaye Scholer, LLP. I defended Fortune 50 companies in Multi-District Litigation primarily in the product liability sphere. I also successfully drafted an appellate brief in the Ninth Circuit resulting in the reversal of a summary judgment

1 decision regarding trade secret issues, in addition to working in several other practice groups.
2 During this time, the firm routinely charged \$500 per hour for my services to clients.

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

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

20 10. On June 14, 2019, I argued two related cases in front of the Ninth Circuit Court of
21 Appeals. One of them was *Rodriguez v Nike Retail Service Inc.*, Case No. 17-16866. On June 28,
22 2019, the Ninth Circuit issued a published decision, reversing and remanding in favor of our clients.
23 *Rodriguez v. Nike Retail Servs., Inc.*, 928 F.3d 810 (9th Cir. 2019).

24 11. I have also assisted the firm in numerous wage and hour class action mediations.

25 12. I do not have any conflicts of interest with the proposed cy pres recipient, Legal Aid
26 at Work.

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

1 Executed on this 18th day of February 2025, at Los Angeles, California.

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EXHIBIT 1

Maravilla v. LCS Community Employment LLC
Time and Task Chart for Max W. Gavron

Hours	Description of Work
4.8	Factual investigation, interviews with client; further confer with co-counsel and client to prepare for filing of action.
1.4	Analyze, review, and revise first amended complaint.
1.1	Review and revise initial written discovery.
3.5	Review Defendant's discovery responses and document production; confer with co-counsel re additional docs and information necessary.
5.3	Conduct legal analysis re Public Readiness and Emergency Preparedness preemption; confer with co-counsel re preemption analysis.
6.9	Analyze and review data requests in advance of mediation; analyze and review data produced for same; confer with co-counsel re exposure analysis and liability in advance of mediation.
3.4	Draft and revise mediation brief; confer with co-counsel re strategy.
8.8	Prepare for and attend mediation.
4.5	Review and revise MOU and longform settlement agreement; confer w/ co-counsel re same.
6.5	Draft and revise settlement approval motions and supporting declarations.
46.2	<u>TOTAL HOURS</u>