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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 GAVRON IN
SUPPORT OF PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
AND REPRESENTATIVE ACTION
SETTLEMENT**

Date: TBD
Time: 3:00 p.m.
Dept.: 17

Complaint Filed: March 23, 2022
Trial Date: None

1 I, Max W. Gavron, declare:

2 1. I am an attorney at law, duly licensed to practice before all Courts in the State
3 of California, and am with the law firm Diversity Law Group, P.C., counsel of record for
4 Plaintiff Thalia Maravilla (“Class Representative” or “Plaintiff”). I have personal knowledge
5 of the facts set forth below and if called to testify I could and would do so competently.

6 2. I am one of the primary attorneys on this matter. I strongly believe that Plaintiffs
7 can prevail at trial. However, based on my own independent investigation and evaluation, I am
8 also of the opinion that settlement for the consideration and on the terms set forth in the Joint
9 Stipulation of Class and Representative Action Settlement (“Agreement” or “Settlement
10 Agreement”) is fair, reasonable, and adequate and is in the best interests of the Class, in light of
11 all known facts and circumstances and the expenses and risks inherent in litigation.

12 3. The funds represented by uncashed settlement checks will be paid out pursuant
13 to California Code of Civil Procedure section 384 to Legal Aid at Work, the designated *cy pres*
14 recipient. I do not maintain an interest in and/or relationship with Legal Aid at Work.

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

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

28 6. 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

1 companies in Multi-District Litigation primarily in the product liability sphere. I also
2 successfully drafted an appellate brief in the Ninth Circuit resulting in the reversal of a
3 summary judgment decision regarding trade secret issues, in addition to working in several
4 other practice groups. *See Experian Info. Solutions v. Nationwide Marketing Servs. Inc.*, 893
5 F.3d 1176 (9th Cir. 2018).

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

10 8. I am currently a lawyer at the law firm Diversity Law Group, P.C., an
11 employment law firm that has handled numerous wage and hour class and individual actions,
12 on both plaintiff and defense sides. My current practice focuses on employment matters
13 involving both class actions, and single plaintiffs. The firm currently has cases in the Los
14 Angeles Superior Courts, the Orange County Superior Courts, the San Diego County Superior
15 Courts, and the United States District Courts for the Central, Northern, and Eastern Districts of
16 California. I am currently handling and have handled, numerous wage and hour class action
17 lawsuits with the firm, including, but not limited to: *Agar v. Sensient Natural Ingredients, LLC*
18 (Case No. CV-19-001906, Stanislaus County Superior Court); *Cunningham, et al. v. Diverse*
19 *Business Solutions* (Case No. CIVDS1817095, San Bernardino County Superior Court);
20 *Heredia v. Eddie Bauer LLC* (Case No. 16CV300475, United States District Court, Northern
21 District of California); *Parsons v. Estenson Logistics, LLC* (Case No. 34-2019-00252929,
22 Sacramento County Superior Court); and *Coronel v. Pinnacle Agriculture* (Case No.
23 18CV004287, Monterey County Superior Court); *Johnson v. Foot Locker Retail, Inc.* (Case
24 No. 3:21-cv-02040-WHO, United States District Court for the Northern District of California).

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

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

1 11. My co-counsel and I will adequately represent the Class Members in this action.
2 Class Counsel has and will zealously represent Plaintiffs and the Class and pursue this lawsuit
3 to its conclusion.

4 I declare under penalty of perjury under the laws of the State of California and United
5 States of America that the foregoing is true and correct. Executed on October 1, 2024, in Los
6 Angeles, California.

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