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Attorneys for Plaintiff and the Class

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ERIC CHAVEZ, as an individual and on
behalf of all others similarly situated,

Plaintiffs,

vs.

CONVERSE, INC., a Delaware
corporation; and DOES 1 through 50,
inclusive,
Defendants.

Case No.: 15-cv-03746-NC

**DECLARATION OF MAX W.
GAVRON IN SUPPORT OF MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: November 20, 2020
Time: 1:00 P.M.
Courtroom: 5, 4th Floor
Judge: Hon. Nathanael Cousins

DECLARATION OF MAX W. GAVRON

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, P.C., counsel of record for Plaintiff Eric Chavez ("Plaintiff"). I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. 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.

3. 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.

4. 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 decision regarding trade secret issues, in addition to working in several other practice groups. *See Experian Info. Solutions v. Nationwide Marketing Servs. Inc.*, 893 F.3d 1176 (9th Cir. 2018).

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

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

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

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

9. To date, I have incurred approximately 116.1 hours in connection with the litigation of this lawsuit. Attached hereto as **Exhibit A** is a summary of the hours I have incurred to date.

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EXHIBIT A

Chavez v Converse, Inc.
Time and Task Chart for Max W. Gavron

Hours	Description of Work
10.1	Factual investigation, review of file and prior rulings from court upon assignment to case.
35.1	Conduct legal research; analyze and review case law regarding security inspection cases, including California Supreme Court's ruling in <i>Troester</i> , for purposes of preparing and drafting opening brief to Ninth Circuit; analyze, review, and summarize 23 deposition transcripts submitted in briefing on summary judgment at trial court for purposes of drafting and revising opening brief to Ninth Circuit.
10.4	Draft and revise Appellant's Opening Brief; further analyze and review trial court rulings for purposes of drafting opening brief.
22.4	Analyze and review Appellee's Answering brief; conduct legal research re the same; analyze and review evidence cited by Appellee in support of answering brief; draft and revise Reply brief.
7.2	Prepare for oral argument in Ninth Circuit; analyze and review record on appeal; moot oral argument.
4.1	Travel to, and from, and attend oral argument at Ninth Circuit.
2.1	Analyze and review Ninth Circuit ruling and confer with co-counsel re strategy on remand.
3.5	Meet and confer with defense counsel re handling of case on remand, including telephonic conferences and correspondence re the same.
8.6	Prepare for and take depositions of two class members after remand.
1.7	Further draft and revise Plaintiff's motion for partial summary judgment.
1.6	Analyze and review Defendant's Motion to Stay; further draft and revise opposition to same.
.8	Analyze and review Court's Order granting partial summary judgment to Plaintiff; confer with co-counsel re case strategy in light of same.
2.1	Analyze and review Defendant's Motion for Summary Judgment; further draft and revise opposition and supporting documents in support of same.
1.1	Analyze and review Court's Order partially granting Defendant's Motion for Summary Judgment; confer with co-counsel re case strategy in light of same.
2.1	Analyze and review Defendant's Motion to Decertify Class; further draft and revise opposition to same; confer with co-counsel re strategy for opposing and considerations for purposes of mediation.
.9	Further review and revise long form settlement agreement.
1.1	Draft and revise motion for preliminary approval and supporting declaration.

1.2	Draft and revise motion for final approval and supporting declaration.
116.1	TOTAL HOURS