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Attorneys for Plaintiff and the Aggrieved Employees

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

JASON GEORGE, as an individual and on
behalf of all others similarly situated,

Plaintiff,

v.

PALISADES TAHOE RESORT, LLC, a
Delaware Limited Liability Company;
SQUAW VALLEY RESORT, LLC, a
business organization, form unknown; and
DOES 1 through 50, inclusive,

Defendants.

CASE NO. S-CV-0049766

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

Date: October 31, 2024
Time: 8:30 A.M.
Dept.: 3

Action Filed: January 19, 2023
Trial Date: Not Set

[illegible]

I, Max W. Gavron, hereby declare and state 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 Jason George (“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. From the inception of the case, Plaintiff's counsel has zealously represented the interests of the aggrieved employees (or "PAGA Group"). 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, 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 PAGA Settlement Agreement is appropriate and in the best interests of Plaintiff and the PAGA Group.

4. 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.

5. 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.

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

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

12 8. I am currently an attorney at the law firm Diversity Law Group, P.C., an
13 employment law firm that has handled numerous wage and hour class and individual actions, on
14 both plaintiff and defense sides. My current practice focuses on employment matters involving
15 both class actions, and single plaintiffs. The firm currently has cases in the Los Angeles Superior
16 Courts, the Orange County Superior Courts, the San Diego County Superior Courts, and the
17 United States District Courts for the Central, Northern, and Eastern Districts of California. I am
18 currently handling, or have handled, numerous wage and hour class action lawsuits with the firm,
19 including, but not limited to: *Agar v. Sensient Natural Ingredients, LLC* (Case No. CV-19-
20 001906, Stanislaus County Superior Court); *Heredia v. Eddie Bauer LLC* (Case No.
21 16CV300475, United States District Court, Northern District of California); *Parsons v. Estenson*
22 *Logistics, LLC* (Case No. 34-2019-00252929, Sacramento County Superior Court); *Wood v.*
23 *Reeve Trucking Co., Inc.* (Case No. STK-CV-UOE-2018-0004414, San Joaquin County Superior
24 Court); *Coronel v. Pinnacle Agriculture* (Case No. 18CV004287, Monterey County Superior
25 Court), and *Tice v. Trader Joe's Company* (Case No. 20CV00892, Santa Barbara County
26 Superior Court), among others.

27 9. I have been certified as class counsel in a number of cases, including *Smith v.*
28 *Gold Country Health Center, Inc.* (Case No. PC20180491, El Dorado County Superior Court)

1 and *Pantoja v. RAMCO Enterprises, L.P.* (Case No. M126835, Monterey County Superior
2 Court). I have also assisted in numerous wage and hour class action mediations.

3 10. On June 14, 2019, I argued two related cases in front of the Ninth Circuit Court of
4 Appeals. One of them was *Rodriguez v Nike Retail Service Inc.*, Case No. 17-16866. On June 28,
5 2019, the Ninth Circuit issued a published decision, reversing and remanding in favor of our
6 clients. *Rodriguez v. Nike Retail Servs., Inc.*, 928 F.3d 810 (9th Cir. 2019). The related case
7 decision was *Chavez v. Converse, Inc.*, 772 Fed. Appx. 571 (June 28, 2019).

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

10 Executed on this 9th day of October 2024, at Los Angeles, California.

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Max W. Gavron