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Attorneys for Plaintiffs, the Class, and Aggrieved Employees

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN JOAQUIN**

GILBERT PARAMO and ROSEMARIE
SANTOS, as individuals and on behalf of
all others similarly situated,

Plaintiffs,

vs.

WEEE LOGISTICS INC., a Delaware
corporation; WEEE! INC., a Delaware
corporation; WEEE! LOGISTICS LLC, a
Delaware limited liability company; and
DOES 1 through 50, inclusive,

Defendants.

Case No.: STK-CV-UOE-2023-0001129

(Assigned to the Honorable Jayne Lee, Dept.
10C)

**DECLARATION OF MAX W. GAVRON IN
SUPPORT OF PLAINTIFFS’ MOTION FOR
FINAL APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: December 6, 2024

Time: 9:00 a.m.

Dept.: 10C

Complaint Filed: February 9, 2023

FAC Filed: August 1, 2023

Trial Date: None Set

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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
 nia, and am with the law firm Diversity Law Group, counsel of record for Plaintiffs
 Paramo and Rosemarie Santos (together, "Plaintiffs"). I have personal knowledge of the
 t forth below and if called to testify I could and would do so competently.

2. The Settlement Agreement was the product of negotiation between highly able experienced attorneys on both sides who possessed the relevant data and extensive legal knowledge which they had carefully analyzed. Plaintiff's Counsel engaged in extensive factual investigation and discovery before settling, including the exchange of informal discovery and relevant class data. This includes the number of putative class members employed by Defendants and through staffing agencies, number for former employees allegedly owed waiting time penalties, number of workweeks and pay periods at issue, applicable rates of pay for class members, a sample of time and pay records of the class members, as well as information regarding Defendants' payroll policies and practices at issue. The exchange of informal discovery allowed Class Counsel to conduct a full analysis of exposure.

3. The Parties engaged in arm's length negotiations at mediation with a highly skilled mediator, Gig Kyriacou, Esq. The Parties also engaged in post-mediation negotiations through the assistance of the mediator, after which settlement was reached.

4. The settlement in the case at bar warrants approval and carries a presumption of
5. As previously noted in the application for Preliminary Approval, this current settlement
6. negotiated at arm's length. I support the settlement as fair, reasonable, and adequate, and in
7. the best interest of the Settlement Class Members as a whole.

5. I have been approved as class counsel in numerous other wage/hour class actions and have been granted class certification and final approval.

6. I am one of the primary attorneys on this matter. My qualifications are as follows: I received a full-tuition scholarship, and graduated from Southwestern Law School in 2013, cum laude. I was in the top 5% of my class. During my time at Southwestern, I was a

1 Notes and Comments Editor on the Southwestern Law Review. I also received awards for
2 achieving the highest grade in my class in several courses. In 2012, I was a full-time extern, at
3 the United States District Court for the Central District. Immediately after law school, I taught
4 several courses at Southwestern, including Principles of Legal Analysis and Legal Methods. I
5 taught those courses for approximately four years.

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

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

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

20 10. I am currently an associate at the law firm Diversity Law Group, P.C., an
21 employment law firm that has handled numerous wage and hour class and individual actions, on
22 both plaintiff and defense sides. My current practice focuses on employment matters involving
23 both class actions, and single plaintiffs. The firm currently has cases in the Los Angeles Superior
24 Courts, the Orange County Superior Courts, the San Diego County Superior Courts, and the
25 United States District Courts for the Central, Northern, and Eastern Districts of California.

26 11. I am currently handling, or have handled, numerous wage and hour class action
27 lawsuits with the firm, including, but not limited to: *Agar v. Sensient Natural Ingredients, LLC*
28 (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); and *Rodas v. Goodyear Tire* (Case No. 21-cv-07526, United States District Court, Central District of California), among many others.

12. 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).

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

14. I have no conflicts with Legal Aid at Work, which is the proposed *cy pres* recipient of the unclaimed funds resulting from this proposed settlement.

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

Executed on this 8th day of November 2024, at Los Angeles, California.


Max W. Gavron