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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
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: October 25, 26 or November 7, 8, 10, 2023

Time: 9:00 a.m.

Dept.: 10C

Complaint Filed: February 9, 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 California, and am with the law firm Diversity Law Group, counsel of record for Plaintiffs Gilbert Paramo and Rosemarie Santos (together, “Plaintiffs”). I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. Based on my independent investigations and evaluation, I believe that settlement for the consideration and on the terms set forth in the Settlement Agreement is fair, reasonable, and adequate and is in the best interests of the Settlement Class in light of all known facts and circumstances and the expenses and risks inherent in litigation.

3. After taking into account sharply disputed factual and legal issues involved in this litigation, the risks attending further prosecution, and the substantial benefits to be received pursuant to the compromise and settlement of the litigation, Plaintiffs and Class Counsel have concluded that settlement on the terms set forth in the Settlement Agreement is appropriate and in the best interests of the Parties and that this settlement is fair and reasonable.

4. 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, 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.

6. From February 2016, through Fall 2017, I practiced at the international law firm

1 of Arnold & Porter, which had recently merged with Kaye Scholer, LLP. I defended Fortune 50
2 companies in Multi-District Litigation primarily in the product liability sphere. I also
3 successfully drafted an appellate brief in the Ninth Circuit resulting in the reversal of a summary
4 judgment decision regarding trade secret issues, in addition to working in several other practice
5 groups.

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 an associate 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, on
12 both plaintiff and defense sides. My current practice focuses on employment matters involving
13 both class actions, and single plaintiffs. The firm currently has cases in the Los Angeles Superior
14 Courts, the Orange County Superior Courts, the San Diego County Superior Courts, and the
15 United States District Courts for the Central, Northern, and Eastern Districts of California.

16 9. I am currently handling, or 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); *Heredia v. Eddie Bauer LLC*
19 (Case No. 16CV300475, United States District Court, Northern District of California); *Parsons*
20 *v. Estenson Logistics, LLC* (Case No. 34-2019-00252929, Sacramento County Superior Court);
21 and *Rodas v. Goodyear Tire* (Case No. 21-cv-07526, United States District Court, Central
22 District of California), among many others.

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

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

28 12. My co-counsel and I will adequately represent the Settlement Class Members in

1 this action. Plaintiffs' counsel have and will zealously represent Plaintiffs and the Settlement
2 Class and pursue this lawsuit to its conclusion.

3 13. I have no conflicts with the Settlement Class and will adequately represent the
4 Settlement Class.

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

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

9 Executed on this 19th day of September 2023, at Los Angeles, California.

10 
11 Max W. Gavron