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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF STANISLAUS

CHELSEY RICHARDSON, BETHANY
JEANNE REINKER, and CHARMAINE
HUFF as individuals and on behalf of all
others similarly situated and aggrieved
employees,

Plaintiffs,

vs.

TELECARE CORPORATION, a
California corporation; and DOES 1
through 50, inclusive,

Defendants.

Case No. CV-24-006292

[Assigned for All Purposes to:
Hon. John R. Mayne, Dept. 21]

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

(Filed concurrently with Supporting
Declarations and [Proposed] Order)

Date: January 30, 2026

Time: 8:30 a.m.

Dept.: 21

Action Filed: August 9, 2024

Trial Date: None Set

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1 successfully drafted an appellate brief in the Ninth Circuit resulting in the reversal of a
2 summary judgment decision regarding trade secret issues, in addition to working in several
3 other practice groups.

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

8 7. I am currently an attorney at the law firm Diversity Law Group, P.C., an
9 employment law firm that has handled numerous wage and hour class and individual actions,
10 on both plaintiff and defense sides. My current practice focuses on employment matters
11 involving both class actions, and single plaintiffs. The firm currently has cases in the Los
12 Angeles Superior Courts, the Orange County Superior Courts, the San Diego County Superior
13 Courts, and the United States District Courts for the Central, Northern, and Eastern Districts of
14 California. I am currently handling, or have handled, numerous wage and hour class action
15 lawsuits with the firm, including, but not limited to: *Weybrew v. BEI Construction*, Solano
16 County Superior Court Case No. FCS055658 (January 14, 2022), *In re See's Candies Wage*
17 *and Hour Cases*, Case No. JCCP5004 (March 30, 2022), Los Angeles Superior Court, *Pevey*
18 *v. Lumber City Corp.*, San Bernardino County Superior Court Case No. CIVDS2010240 (May
19 2, 2022), *Ross v Stater Bros. Markets*, San Bernardino County Superior Court Case No.
20 CIVDS1902518 (September 8, 2022), and *Schneider v. Amazon Retail LLC*, Los Angeles
21 County Superior Court Case No. 21STCV26226 (December 1, 2022); *James v RADC*
22 *Enterprises, Inc.*, San Bernardino County Superior Court, Case No. CIV-DS1933035
23 (September 29, 2020), *Hector Luna v. Triple Canopy, Inc.*, Santa Clara County Superior
24 Court, Case No. 19CV345169 (October 22, 2020), *Melbert Magpugay v. Harbor Electronics,*
25 *Inc.*, Santa Clara County Superior Court Case No. 19CV352547 (January 27, 2021), *Foster v.*
26 *Schindler Elevator Corp.*, Alameda County Superior Court Case no. RG19029640 (March 2,
27 2021), *Martin v. Streetplus Company, LLC, et al*, Los Angeles Superior Court Case No.
28 19STCV15522 (July 13, 2021), *Morris v. Blue Mountain Enterprises, LLC*, Solano County
Superior Court, Case No. FCS05.858 (August 4, 2021).

8. 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).

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

10. My co-counsel and I will adequately represent the Class Members in this action. Class Counsel has and will zealously represent Plaintiff and the Class Members and pursue this lawsuit to its conclusion.

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 December 2025, at Los Angeles, California.


Max W. Gavron