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Attorneys for Plaintiff and the Class

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

CHRISTIE MINES, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

SOUTHERN MONTEREY COUNTY
MEMORIAL HOSPITAL, a California
nonprofit corporation; and DOES 1
through 50, inclusive,

Defendants.

Case No.: 24CV005289

Assigned to the Honorable Thoman W. Wills, Dept.
15)

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

Date: April 10, 2026

Time: 8:30 A.M.

Dept.: 15

Action Filed: December 12, 2024

Trial Date: Not Set

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 Christie Mines (“Plaintiff”). I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. The proposed settlement meets the criteria for this Court to grant final approval of this matter on a class-wide basis, as the settlement is fair, adequate, and reasonable.

3. The Joint Stipulation of Class and PAGA Settlement (the “Stipulation” or “Agreement”) was the product of negotiations between highly able and experienced attorneys on both sides who possessed the relevant data and extensive legal research which they had carefully analyzed. The Parties engaged in arm’s length negotiations.

4. Class Counsel engaged in extensive factual investigation before settling, including formal and informal discovery. Plaintiff and Defendant served written discovery. Plaintiff reviewed Defendant’s production of class data and pay records for the putative class, which included the number of pay periods where employees were paid overtime/doubletime and any form of non-discretionary remuneration. This investigation enabled Plaintiff to perform an analysis of the putative class and Defendant’s potential liability.

5. I have spent significant time researching and pursuing the claims that have been alleged in this action. Based on my independent investigations and evaluations, I am of the opinion that the proposed settlement is fair, reasonable, and adequate, and is in the best interests of the Class, in light of all known facts and circumstances, and the expenses and risks inherent in litigation. The settlement was negotiated at arm’s length by experienced attorneys and thus, this settlement should be granted final approval.

6. The Court preliminary approved this settlement on November 21, 2025, directing distribution of the Notice of Class Action Settlement (“Class Notice”) and scheduling the hearing for final approval of the settlement (the “Preliminary Approval Order”). As directed by the Court, the Settlement Administrator selected by the Parties – Phoenix Settlement Administrators

1 – distributed the Class Notice to 184 Class Members. Class Counsel believes that the positive
2 results after the mailing of the Class Notice support confirmation of the Court’s preliminary
3 approval of the settlement with final approval of the settlement. The settlement has a 100%
4 participation rate. In light of this positive response from Class Members, an inference can be
5 made that the Settlement Class supports the Court’s Preliminary Approval Order finding that the
6 Stipulation is fair and reasonable.

7 7. There were no objections or disputes to the amount of attorneys’ fees or litigation
8 costs that Class Counsel seeks in this case and for which Plaintiff asks the Court for final
9 approval. Moreover, zero (0) individuals requested to be excluded from the settlement.

10 8. Any remaining monies from uncashed settlement checks will be distributed to the
11 *cy pres* recipient Legal Aid at Work, in accordance with Code of Civil Procedure § 384. I do not
12 have any relationship with or connection to said organization.

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

15 10. I am one of the primary attorneys on this matter. My qualifications are as
16 follows: I received a full-tuition scholarship, and graduated from Southwestern Law School in
17 2013, *magna cum laude*. I was in the top 5% of my class. During my time at Southwestern, I was
18 a Notes and Comments Editor on the Southwestern Law Review. I also received awards for
19 achieving the highest grade in my class in several courses. In 2012, I was a full-time extern, at
20 the United States District Court for the Central District. Immediately after law school, I taught
21 several courses at Southwestern, including Principles of Legal Analysis and Legal Methods. I
22 taught those courses for approximately four years.

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

28 12. 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. *See Experian Info. Solutions v. Nationwide Marketing Servs. Inc.*, 893 F.3d 1176 (9th
6 Cir. 2018).

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

11 14. I am currently an associate at the law firm of Diversity Law Group, P.C., an
12 employment law firm that has handled numerous wage and hour class and individual actions, on
13 both plaintiff and defense sides. My current practice focuses on employment matters involving
14 both class actions, and single plaintiffs. The firm currently has cases in courts throughout the
15 State of California, including but not limited to the Los Angeles Superior Court, Orange County
16 Superior Court, San Diego County Superior Courts, Santa Clara County Superior Court, 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); *Martin v. Streetplus*
22 *Company, LLC* (Case No. 19STCV15522, Los Angeles County Superior Court); *Parsons v.*
23 *Estenson Logistics, LLC* (Case No. 34-2019-00252929, Sacramento County Superior Court),
24 *Pevey v. Lumber City Corp.* (Case No. CIVDS2010240, San Bernardino County Superior Court),
25 and *Weybrew v. BEI Construction, Inc.* (Case No. FCS055658, Solano County Superior Court),
26 among many others.

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

5 16. I have also assisted the firm in numerous wage and hour class action
6 mediations.

7 17. To date, I have incurred approximately 60.7 hours in connection with the
8 litigation of this lawsuit. Attached hereto as **Exhibit A** is a summary of the hours I have incurred
9 to date.

10 18. I also anticipate spending an additional 5 hours conferring and reviewing e-mails
11 and other written communications with counsel for Defendant, the Settlement Administrator, and
12 Class Members regarding post final approval matters, including payments and related issues.

13 19. I have been approved at \$750.00 per hour rate in *Aristondo v. Prospera*
14 *Management Inc.* Orange County Superior Court Case No. 30-2023-01334274-CU-OE-CXC
15 (July 30, 2025), *Torres v. Fidelity Management Services, LLC*, Santa Clara Superior Court Case
16 No. 23CV416377 (September 8, 2025), and *Custodio v. Randstad Inhouse Services, LLC*,
17 Alameda County Superior Court, Case No. 23cv029977 (January 15, 2026). Prior to that, I was
18 approved at \$700.00 per hour in *Abernathy v. Deacon Construction, LLC*, Santa Clara County
19 Superior Court Case No. 20CV367327 (February 10, 2025), *Middlebrooks v. Fleetpride, Inc.*,
20 Shasta County Superior Court, Case No. 23CV-0202247 (March 24, 2025), *Shams v. Revature*
21 *LLC*, Santa Clara Superior Court, Case No. 22cv394270 (June 6, 2025). Since January 2024, I
22 was approved at \$650.00 per hour in *Jaramillo v. USS-UPI, LLC*, Contra Costa County Case No.
23 C22-00641 (April 24, 2024). Prior to that, I have been approved at \$600.00 per hour in *Weybrew*
24 *v. BEI Construction*, Solano County Superior Court Case No. FCS055658 (January 14, 2022), *In*
25 *re See's Candies Wage and Hour Cases*, Case No. JCCP5004 (March 30, 2022), *Pevey v.*
26 *Lumber City Corp*, San Bernardino County Superior Court Case No. CIVDS2010240 (May 2,
27 2022), *Anguiano v. Mann Packing Co., Inc.*, Monterey County Superior Court Case No.
28 19CV001178, and *Schneider v. Amazon Retail LLC*, Los Angeles County Superior Court Case

No. 21STCV26226 (December 1, 2022), *Hyde v. Prime Now LLC*, Alameda County Superior Court Case No. RG20068286 (August 11, 2023), among others. Prior to that throughout 2020 and 2021, I was approved at an hourly rate of at \$550.00 per hour in *James v RADC Enterprises, Inc.*, San Bernardino County Superior Court, Case No. CIV-DS1933035 (September 29, 2020), *Hector Luna v. Triple Canopy, Inc.*, Santa Clara County Superior Court, Case No. 19CV345169 (October 22, 2020), *Melbert Magpugay v. Harbor Electronics, Inc.*, Santa Clara County Superior Court Case No. 19CV352547 (January 27, 2021), *Foster v. Schindler Elevator Corp.*, Alameda County Superior Court Case no. RG19029640 (March 2, 2021), *Martin v. Streetplus Company, LLC, et al*, Los Angeles Superior Court Case No. 19STCV15522 (July 13, 2021), *Morris v. Blue Mountain Enterprises, LLC*, Solano County Superior Court, Case No. FCS05858 (August 4, 2021).

20. I believe \$750.00 per hour is a reasonable rate for my services as demonstrated by the many courts throughout California approving that rate. However, in this motion, I request a reduced hourly rate of \$500.00, which considers the jurisdiction where this Action was litigated. Accordingly, the total lodestar for my hours will be approximately \$32,850.00 based on an hourly rate of \$500.00 per hour [(60.7 hours + 5 anticipated hours) x \$500].

21. Between my co-counsel and I, we will have spent approximately 107.2 hours litigating this case through final approval and settlement administration. The total lodestar is approximately \$56,820.50, which results in a slightly negative multiplier of 0.99. This further supports the fee award requested.

22. My office has incurred costs in the amount of \$2,101.20. The costs are all litigation-related costs, such as filing fees, service of process costs, and postage. Attached hereto as **Exhibit B** is copy of the costs incurred in connection with prosecution of this lawsuit.

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23. Concurrent with this filing, my office uploaded the motion and supporting documents to the LWDA. Attached hereto as **Exhibit C** is a true and correct copy of the upload confirmation.

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

Executed on this 18th day of March 2026, at Los Angeles, California.


Max W. Gavron

EXHIBIT A

Mines v. Southern Monterey County Memorial Hospital
Max W. Gavron Time and Task Chart

Hours	Description of Work
12.8	Initial research and review of background facts in preparation for filing of class action claims; confer with co-counsel re theories of liability and conduct research re same; analysis and research re defendants and prior settlements.
3.4	Draft and revise joint case management statement; confer with defense counsel re same; analyze and review Defendant's Answer to evaluate defenses.
1.2	Draft and revise First Amended Complaint; confer with co-counsel re same.
5.7	Draft and revise first set of written discovery; analyze and review documents from client to prepare same; confer with co-counsel and client re same.
2.5	Analyze and review written discovery served by Defendant, including notice of deposition; confer with client re same.
1.5	Analyze and review prior settlements against Defendant to evaluate claims in this case and reasonable range of potential resolution; confer with co-counsel re same.
3.5	Confer with defense counsel re prospect of mediation as opposed to direct settlement negotiations given size of putative class and relatively focused theory of liability; draft and revise request for informal data to produce in advance of mediation.
4.9	Analyze and review sampling of time and pay records; conduct damages analysis; confer with co-counsel re same; further review of documents produced by Defendant considering review of sampling of time and pay records; conduct further legal research in light of same.
2.9	Negotiations with defense counsel, including significant correspondence and phone conversations to achieve proposed settlement.
8.9	Review and revise settlement agreement and related documents (i.e., settlement agreement, class notice); conversations with opposing counsel re same; confer with co-counsel re terms of settlement agreement and make revisions in light of same.
6.4	Draft and revise Motion for Preliminary Approval and Declarations thereto; confer with co-counsel and opposing counsel re same.
1.0	Analyze and review Court's preliminary approval order; confer with defense counsel and settlement administrator re same.
6.0	Draft and revise motion for final approval and supporting documents; confer with co-counsel and defense counsel re the same; confer with administrator to prepare declaration in support of final approval.
60.7	TOTAL HOURS

EXHIBIT B



INVOICE

Diversity Law Group

515 South Figueroa Street, Suite 1250,
Los Angeles, California, 90071
lwlee@diversitylaw.com

Invoice # 10397
Invoice Date 03/16/2026
Terms Upon Receipt
Due Date 03/16/2026
PO #

Summary- Mines, Christie v. Southern Monterey County Memorial Hospital (13181.001)

Type	Description	Amount
Fees & Other Charges		0.00
Billed Time		0.00
Expenses		2,101.20

Subtotal: \$2,101.20
Discount: \$0.00
Subtotal after Discount:\$2,101.20
Taxable Subtotal: \$2,101.20
Tax: \$0.00
Total: \$2,101.20

Details - Mines, Christie v. Southern Monterey County Memorial Hospital (13181.001)

Expenses

Date	Category	Expense Code	Description	Amount (\$)
12/02/2024		Court fees	LWDALWDA	75.00
12/12/2024		Court fees	Odyssey - ComplaintOdyssey - Complaint	1,478.06
12/31/2024	Postage and delivery		Postage	9.64
01/13/2025	Attorney Service		ACE - Complaint Service	199.50
01/22/2025	Court Fees		Odyssey - POS of Summons	4.50
02/05/2025	Court Fees		Odyssey - FAC	4.50
02/28/2025	Postage and delivery		Postage	1.25
04/01/2025	Court Fees		Odyssey - Joint CMS (Envelope Number: 18809900)	4.50
08/11/2025	Court Fees		Odyssey - Joint CMS (Envelope Number: 20438617)	4.50
10/29/2025	Court Fees		Odyssey - MPA (Envelope Number: 21410690)	65.25
11/25/2025	Court Fees		Odyssey - NOE (Envelope Number: 21737091)	4.50
02/18/2026	Court Fees		WIP - MFA Filing Costs	250.00
Subtotal:				\$2,101.20
Total:				\$2,101.20

EXHIBIT C