

CLAIMANT'S FIRST SET OF DISCOVERY

(Final Wages and Statutory Penalty Wages Only)

Claimant: Jorden Hollingsworth

Respondent: DRVM LLC

JAMS Case No.: 5160000821

Pursuant to the Scheduling Order and the JAMS Employment Arbitration Rules, Claimant Jorden Hollingsworth propounds the following Interrogatories and Requests for Production to Respondent DRVM LLC. These discovery requests are narrowly tailored to issues concerning unpaid final wages and statutory penalty wages arising from Respondent's failure to timely pay all wages due upon termination.

These requests do not seek discovery related to enterprise liability, parent entities, or non-party corporate control.

I. DEFINITIONS

1. "Claimant" means Jorden Hollingsworth.
2. "Respondent" or "DRVM LLC" means DRVM LLC, including its officers, managers, employees, payroll personnel, agents, and any third party acting on its behalf with respect to Claimant's wages or final pay.
3. "Final wages" means all wages, compensation, commissions, or other earned remuneration owed to Claimant as of the date of termination, including any amounts required to be paid under applicable final wage statutes.

4. "Termination" means the end of Claimant's employment with DRVM LLC on or about December 12, 2024.
5. "Document" or "documents" has the broadest meaning permitted and includes writings, emails, text messages, spreadsheets, payroll records, electronic files, and data stored in any medium.
6. "Communication" means any oral, written, or electronic exchange of information, including emails, text messages, instant messages, letters, and memoranda.
7. "Identify" when referring to a person means to state the person's name, job title or role, and relationship to DRVM LLC. When referring to a document, it means to state its type, date, author, and general subject matter.
8. "Person" means any natural person or legal entity.

II. INSTRUCTIONS

1. Scope.

These discovery requests are limited to matters relevant to Claimant's unpaid final wages and statutory penalty wage claims arising from Respondent's failure to timely pay wages upon termination.

2. Time Period.

Unless otherwise stated, these requests cover the period from October 1, 2024 through the present, including any post-termination payments or adjustments.

3. Duty to Supplement.

Respondent has a continuing obligation to supplement or amend responses if additional responsive information becomes available.

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4. Complete Answers Required.

Each Interrogatory must be answered fully and separately. If Respondent cannot answer in full, it must state the reason and provide all information available.

5. Objections.

Any objection must state with specificity the grounds for the objection. General or boilerplate objections are not sufficient.

6. Partial Responses.

If Respondent objects to any portion of a request, Respondent shall answer the non-objectionable portion.

7. Documents Withheld.

If any responsive document is withheld based on privilege or other protection, Respondent shall identify the document by type, date, author, and general subject matter.

8. Form of Production.

Documents shall be produced as they are kept in the usual course of business or organized and labeled to correspond with the request to which they respond.

9. Third-Party Documents.

Documents in Respondent's possession, custody, or control include documents held by payroll providers or other third parties acting on Respondent's behalf.

10. Interpretation.

These requests shall be interpreted reasonably and in good faith to permit discovery of relevant information consistent with the Scheduling Order.

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11. Good Faith Interpretation.

These requests are intended to be interpreted consistent with the arbitrator's directive that discovery be proportional and focused on final wage and statutory penalty issues.

III. INTERROGATORIES

Interrogatory No. 1 – Termination Date

State the exact date and time Claimant's employment with DRVM LLC ended.

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Interrogatory No. 2 – Final Wages Owed

State the total amount of wages DRVM LLC contends were owed to Claimant as of the date of termination, including base wages, commissions, or any other earned compensation.

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Interrogatory No. 3 – Final Wages Paid

State the amount of wages actually paid to Claimant upon termination, the date(s) on which such wages were paid, and the method of payment.

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Interrogatory No. 4 – Reason for Non-Payment

If any wages owed to Claimant were not paid on the date of termination, state all reasons why such wages were not paid at that time.

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Interrogatory No. 5 – Final Wage Calculation Method

Describe in detail how DRVM LLC calculated Claimant's final wages, including any formulas, classifications, conversions, payroll practices, or third-party processes used.

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Interrogatory No. 6 – Commission Treatment

State whether commissions earned by Claimant as of the date of termination were included in final wages, and if so, how those commissions were calculated, classified, and paid.

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Interrogatory No. 7 – Decision-Maker(s)

Identify each person who authorized, approved, directed, or exercised control over the timing and amount of Claimant's final wage payment, including any decision not to issue final wages on the date of termination.

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Interrogatory No. 8 – Policies and Practice

State whether DRVM LLC had any policy or practice governing the timing of final wage payments at the time of Claimant's termination and whether that policy or practice was followed in Claimant's case.

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Interrogatory No. 9 – Statutory Compliance

State whether DRVM LLC contends it complied with all applicable final wage payment requirements at the time of Claimant's termination, identify all facts supporting that contention, and identify all persons involved in reaching that determination

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Interrogatory No. 10 – Defenses

Identify all defenses DRVM LLC contends apply to Claimant's unpaid wage and statutory penalty wage claims and state the factual basis for each defense. For each defense identified, state whether the defense is legal, factual, or both.

IV. REQUESTS FOR PRODUCTION

RFP No. 1 – Final Wage Calculation Documents

All documents reflecting the calculation, approval, and payment of Claimant's final wages.

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RFP No. 2 – Termination Records

All documents reflecting Claimant's termination, including internal communications concerning final wages or final pay timing.

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RFP No. 3 – Commission Records

All documents reflecting commissions earned by Claimant as of the date of termination.

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RFP No. 4 – Calculation Worksheets

All spreadsheets, worksheets, summaries, or internal records used to calculate Claimant's final wages or any statutory penalties.

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RFP No. 5 – Payroll Provider Communications

All communications between DRVM LLC and any payroll provider or payroll service regarding instructions, approvals, delays, or timing decisions concerning the calculation or issuance of Claimant's final wages.

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RFP No. 6 – Payment Timing Records

All documents reflecting when and how Claimant's final wages were issued, including payroll registers, bank confirmations, or payment authorizations.

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RFP No. 7 – Policies and Training Materials

All policies, handbooks, guidelines, or training materials governing final wage payments, commissions, or penalties applicable to Claimant.

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RFP No. 8 – Post-Termination Payments or Adjustments

All documents reflecting any post-termination payments, adjustments, corrections, or recalculations made to Claimant's wages.

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RFP No. 9 – Compliance Reliance Documents

All documents DRVM LLC reviewed, considered, or relied upon in determining that Claimant's final wages were timely and fully paid.

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RFP No. 10 – Decision Authority Documents

All documents reflecting or evidencing who authorized, approved, or controlled the timing of Claimant's final wage payment, including instructions to payroll personnel or third-party processors.

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Dated: January 27, 2026

Respectfully submitted,

/s/ Jordan Hollingsworth

Jordan Hollingsworth

Claimant, (Pro Se)