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9 IN RE ARBITRATION

10 JAMS ALTERNATIVE DISPUTE RESOLUTION
11

12 JORDEN HOLLINGSWORTH,

13 Claimant,

14 v.

15 DRVM LLC

16 Respondent.

Case No. 5160000663

**RESPONDENT DRVM'S RESPONSES
TO CLAIMANT'S FIRST SET OF
DISCOVERY (Interrogatories and
Requests for Production of Documents)**

17 PROPOUNDING PARTY: Claimant, JORDEN HOLLINGSWORTH
18

19 RESPONDING PARTY: Respondent, DRVM LLC

20 SET NUMBER: One

21 In accordance with Fed. R. Civ. P. 26, 33, and 34, Respondent DRVM LLC ("Respondent"),
22 responds to Claimant's First Set of Interrogatories and First Set of Requests for Production of
23 Documents dated January 27, 2026 (the "Requests"), as set forth below. Respondent reserves the right
24 to revise and/or supplement its responses to Claimant's Requests if, in the course of discovery,
25 information or documents becomes available that would require revisions and/or supplementation in
26 order to correctly and/or adequately respond to Claimant's Requests.

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3 **PRELIMINARY STATEMENT**

4 1. Respondent’s responses to the Interrogatories and Requests for Production are made to
5 the best of its present knowledge, information, and belief. Said response is at all times subject to such
6 additional or different information that discovery or further investigation may disclose and, while based
7 on the present state of Respondent’s current recollection, is subject to such refreshing of recollection,
8 and such additional knowledge of facts, as may result from further discovery or investigation. It should
9 be noted that Respondent has not fully completed its investigation of the facts relating to this case and
10 has not fully completed discovery in this action, nor fully completed its preparation for trial.
11 Respondent reserves the right to make any use of, or to introduce at any hearing and at trial, information
12 responsive to the Interrogatories and Requests for Production, but, discovered subsequent to the date
13 of this response, including, but not limited to, any such information obtained in discovery herein.

14 2. The responses/objections herein are made solely for the purpose of this action.
15 Respondent reserves all objections or other questions as to the competency, relevance, materiality,
16 privilege or admissibility as evidence in any subsequent proceeding or trial of this or any other action
17 for any purpose whatsoever of its responses herein and any information provided in response to the
18 Interrogatories and Requests for Production.

19 3. The responses below are based upon information presently available to Respondent and
20 upon documents known to be in its possession, custody or control. No incidental or implied admissions
21 are intended. The fact that Respondent has responded to all or any part of any individual request or any
22 subpart thereof should not be taken as an admission that Respondent accepts or admits the existence of
23 any fact or facts set forth or assumed by such Interrogatory or Request for Production or that such
24 responses constitute admissible evidence. The fact that Respondent has responded to all or part of any
25 individual Interrogatory or Request for Production or subpart thereof is not intended to be and shall not
26 be construed to be a waiver by Respondent of all or any part of any objection which is made to any
individual request or subpart thereof.

1 Subject to the foregoing, Respondent hereby responds to specific Interrogatories and Requests
2 for Production as follows:

3 **GENERAL OBJECTIONS**
4

5 1. Respondent generally objects to Claimant's Requests to the extent Claimant imposes
6 requirements on Respondent that exceed those permitted by the Court pursuant to the Federal Rules of
7 Civil Procedure. Respondent will respond to the Requests only as required by those rules.

8 2. Respondent also objects to Claimant's Requests to the extent they require the disclosure
9 of information that is subject to the attorney-client privilege, the work product doctrine, or any other
10 applicable privilege or immunity.

11 3. Respondent further objects to any instructions or definitions to the extent they are
12 inconsistent with each other.

13 4. Respondent further generally objects to Claimant's Requests to the extent they require
14 the disclosure of third-party information of a nature that third parties, including but not limited to
15 employees and former employees, would normally not expect an employer to disclose.

16 5. Respondent further generally objects to Claimant's Requests to the extent they require
17 Respondent to respond/answer with information or documents that are not in its direct possession and/or
18 control or which is available to Claimant through reasonable efforts from sources other than Respondent.

19 6. Respondent objects to Claimant's Requests to the extent they seek disclosure of
20 proprietary and/or confidential business information of Respondent. To the extent the Requests do seek
21 such information, Respondent will respond only pursuant to a protective order under Fed. R. Civ.
22 P.26(c).

23 7. When Respondent indicates that it will produce responsive documents, it will do so to
24 the extent that any such documents exist and can be located by a reasonable search. Neither the lack of
25 any objection to a request nor a statement that responsive documents will be produced shall constitute
26 an indication that any responsive documents exist or do not exist.

1 **RESPONSE TO INTERROGATORY NO. 2:** Respondent objects to this request on the grounds it
2 is vague and ambiguous as to the entire phase, leaving Respondent to wonder whether Claimant is
3 seeking a response that considers tax withholdings, reimbursements, and the like. Respondent objects
4 on the grounds that the request seeks information that is equally available to Claimant. Respondent
5 objects to the request to the extent the request impermissibly contains subparts and/or is compound,
6 conjunctive, or disjunctive. Respondent objects to this request to the extent it seeks private information
7 about third parties, which is protected by third party privacy rights under the Federal constitution and
8 applicable statutes. Respondent objects to this request to the extent that it seeks proprietary and
9 confidential information, and it may seek documents protected by the attorney-client privilege, the
10 attorney work product doctrine and/or other privileges, protections, or doctrines of similar effect.

11 *Subject to and without waiving the foregoing general and specific objections, Respondent*
12 *responds as follows:* Claimant's final gross compensation for the period Claimant worked between
13 December 9, 2024 and December 12, 2024, was six hundred and thirty-seven dollars and fifteen cents
14 (\$637.15). Respondent refers Claimant to the documents produced concurrently herewith at DRVM
15 000001. Respondent's investigation is ongoing, and discovery is continuing. Respondent reserves the
16 right to supplement this response upon the completion of further discovery.

17 **INTERROGATORY NO. 3:** Final Wages Paid. State the amount of wages
18 actually paid to Claimant upon termination, the date(s) on which such wages were
19 paid, and the method of payment.

20 **RESPONSE TO INTERROGATORY NO. 3:** Respondent objects to this request on the grounds it is
21 vague and ambiguous as to the entire phase, leaving Respondent to wonder whether Claimant is seeking
22 a response that considers tax withholdings, reimbursements, and the like. Respondent objects on the
23 grounds that the request seeks information that is equally available to Claimant. Respondent objects to
24 the request to the extent the request impermissibly contains subparts and/or is compound, conjunctive,
25 or disjunctive. Respondent objects to this request to the extent it seeks private information about third
26 parties, which is protected by third party privacy rights under the Federal constitution and applicable
statutes. Respondent objects to this request to the extent that it seeks proprietary and confidential

1 information, and it may seek documents protected by the attorney-client privilege, the attorney work
2 product doctrine and/or other privileges, protections, or doctrines of similar effect. Respondent objects
3 to this request to the extent it calls for a legal opinion and/or conclusion.

4 ***Subject to and without waiving the foregoing general and specific objections, Respondent***
5 ***responds as follows:*** Claimant’s final gross compensation for the period Claimant worked between
6 December 9, 2024 and December 12, 2024, was six hundred and thirty-seven dollars and fifteen cents
7 (\$637.15). Respondent refers Claimant to *see generally* the documents produced concurrently herewith
8 as Bates-stamped DRVM 000001 – DRVM 000100. Respondent’s investigation is ongoing, and
9 discovery is continuing. Respondent reserves the right to supplement this response upon the completion
10 of further discovery.

11 **INTERROGATORY NO. 4:** Reason for Non-Payment. If any wages owed
12 to Claimant were not paid on the date of termination, state all reasons why such
13 wages were not paid at that time.

14 **RESPONSE TO INTERROGATORY NO. 4:** Respondent objects to this request on the grounds it
15 calls for a legal opinion and/or conclusion. Respondent objects to this request to the extent it
16 impermissibly contains subparts and/or is compound, conjunctive, or disjunctive. Respondent objects
17 on the grounds that the information is equally available to Claimant. Respondent objects to this request
18 on the grounds it is vague and ambiguous as to the entire request as it requires Respondent to speculate
19 regarding “reasons why.” Respondent objects to this request to the extent it seeks private information
20 about third parties, which is protected by third party privacy rights under the Federal constitution and
21 applicable statutes. Respondent objects to this request to the extent that it seeks proprietary and
22 confidential information, and it may seek documents protected by the attorney-client privilege, the
23 attorney work product doctrine and/or other privileges, protections, or doctrines of similar effect.

24 ***Subject to and without waiving the foregoing general and specific objections, Respondent***
25 ***responds as follows:*** Respondent refers Claimant to *see generally* the documents produced
26 concurrently herewith as Bates-stamped DRVM 000001 – DRVM 000100. Respondent’s investigation

1 is ongoing, and discovery is continuing. Respondent reserves the right to supplement this response upon
2 the completion of further discovery.

3
4 **INTERROGATORY NO. 5:** Final Wage Calculation Method. Describe in
5 detail how DRVM LLC calculated Claimant's final wages, including any formulas,
6 classifications, conversions, payroll practices, or third-party processes used.

7 **RESPONSE TO INTERROGATORY NO. 5:** Respondent objects to this request on the grounds it is
8 vague and ambiguous as to the entire phase, leaving Respondent to wonder whether Claimant is seeking
9 a response that considers tax withholdings, reimbursements, and the like. Respondent objects on the
10 grounds that the request seeks information that is equally available to Claimant. Respondent objects to
11 the request to the extent the request impermissibly contains subparts and/or is compound, conjunctive,
12 or disjunctive. Respondent objects to this request to the extent it seeks private information about third
13 parties, which is protected by third party privacy rights under the Federal constitution and applicable
14 statutes. Respondent objects to this request to the extent that it seeks proprietary and confidential
15 information, and it may seek documents protected by the attorney-client privilege, the attorney work
16 product doctrine and/or other privileges, protections, or doctrines of similar effect. Respondent objects
17 to this request to the extent it calls for a legal opinion and/or conclusion.

18 *Subject to and without waiving the foregoing general and specific objections, Respondent*
19 *responds as follows:* Claimant's compensation structure is clearly evidenced in each of his wage
20 statements. Respondent refers Claimant to *see generally* the documents produced concurrently
21 herewith as Bates-stamped DRVM 000001 – DRVM 000100. Respondent's investigation is ongoing,
22 and discovery is continuing. Respondent reserves the right to supplement this response upon the
23 completion of further discovery.

24 **INTERROGATORY NO. 6:** Commission Treatment. State whether
25 commissions earned by Claimant as of the date of termination were included in final wages,
26 and if so, how those commissions were calculated, classified, and paid.

27 **RESPONSE TO INTERROGATORY NO. 6:** Respondent objects to this request on the grounds it is
28 vague and ambiguous as to the entire phrase, leaving Respondent to wonder whether Claimant is

1 seeking a response that considers tax withholdings, reimbursements, and the like. Respondent further
2 objects on the same grounds that the phrase “calculated, classified, and paid” and the term “earned” are
3 vague and ambiguous. Respondent objects on the grounds that the request seeks information that is
4 equally available to Claimant. Respondent objects to the request to the extent the request impermissibly
5 contains subparts and/or is compound, conjunctive, or disjunctive. Respondent objects to this request
6 to the extent it seeks private information about third parties, which is protected by third party privacy
7 rights under the Federal constitution and applicable statutes. Respondent objects to this request to the
8 extent that it seeks proprietary and confidential information, and it may seek documents protected by
9 the attorney-client privilege, the attorney work product doctrine and/or other privileges, protections, or
10 doctrines of similar effect. Respondent objects to this request to the extent it calls for a legal opinion
11 and/or conclusion.

12 ***Subject to and without waiving the foregoing general and specific objections, Respondent***
13 ***responds as follows:*** Claimant’s earned commission for the period Claimant worked between
14 December 9, 2024 and December 12, 2024 is displayed on his December 27, 2024 wage statement.
15 Respondent refers Claimant to *see generally* the documents produced concurrently herewith as Bates-
16 stamped DRVM 000001 – DRVM 000100. Respondent’s investigation is ongoing, and discovery is
17 continuing. Respondent reserves the right to supplement this response upon the completion of further
18 discovery.

19 **INTERROGATORY NO. 7:** Decision-Maker(s). Identify each person
20 who authorized, approved, directed, or exercised control over the timing and
21 amount of Claimant’s final wage payment, including any decision not to issue final
22 wages on the date of termination.

23 **RESPONSE TO INTERROGATORY NO. 7:** Respondent objects to the request to the extent the
24 request impermissibly contains subparts and/or is compound, conjunctive, or disjunctive. Respondent
25 objects to this request on the grounds it is vague and ambiguous as to the entire phrase, leaving
26 Respondent to speculate as to the meaning of the terms “authorized,” “approved,” “directed,” and
“timing,” and as to the phrase “exercised control” as used in this request. Respondent objects to this

1 request to the extent it seeks private information about third parties, which is protected by third party
2 privacy rights under the Federal constitution and applicable statutes. Respondent objects to this request
3 to the extent that it seeks proprietary and confidential information, and it may seek documents protected
4 by the attorney-client privilege, the attorney work product doctrine and/or other privileges, protections,
5 or doctrines of similar effect. Respondent objects to this request to the extent it calls for a legal opinion
6 and/or conclusion.

7 ***Subject to and without waiving the foregoing general and specific objections, Respondent***
8 ***responds as follows:*** Respondent refers Claimant to DRVM’s Initial Disclosures and documents
9 produced concurrently herewith as Bates-stamped DRVM 000001 – DRVM 000100. Respondent’s
10 investigation is ongoing, and discovery is continuing. Respondent reserves the right to supplement this
11 response upon the completion of further discovery.

12 **INTERROGATORY NO. 8:** Policies and Practice. State whether DRVM
13 LLC had any policy or practice governing the timing of final wage payments at the
14 time of Claimant’s termination and whether that policy or practice was followed in
15 Claimant’s case.

16 **RESPONSE TO INTERROGATORY NO. 8:** Respondent objects to the request to the extent the
17 request impermissibly contains subparts and/or is compound, conjunctive, or disjunctive. Respondent
18 objects to this request on the grounds it is vague and ambiguous as to the entire phrase, leaving
19 Respondent to speculate as to the meaning of the terms “policy,” “practice,” and “timing” as used in
20 this request. Respondent objects to this request to the extent it seeks private information about third
21 parties, which is protected by third party privacy rights under the Federal constitution and applicable
22 statutes. Respondent objects to this request to the extent that it seeks proprietary and confidential
23 information, and it may seek documents protected by the attorney-client privilege, the attorney work
24 product doctrine and/or other privileges, protections, or doctrines of similar effect. Respondent objects
25 to this request to the extent it calls for a legal opinion and/or conclusion.

26 ***Subject to and without waiving the foregoing general and specific objections, Respondent***
responds as follows: Respondent will produce non-confidential business records detailing any policies

1 regarding payment of wages upon employees' termination to the extent such records exist. Respondent
2 refers Claimant to *see generally* the documents produced concurrently herewith as Bates-stamped
3 DRVM 000001 – DRVM 000100. Respondent's investigation is ongoing, and discovery is continuing.
4 Respondent reserves the right to supplement this response upon the completion of further discovery.

5
6 **INTERROGATORY NO. 9:** Statutory Compliance. State whether DRVM
7 LLC contends it complied with all applicable final wage payment requirements at
8 the time of Claimant's termination, identify all facts supporting that contention, and
9 identify all persons involved in reaching that determination.

10 **RESPONSE TO INTERROGATORY NO. 9:** Respondent objects to this request on the grounds it
11 calls for a legal opinion and/or conclusion. Respondent objects to the request to the extent the request
12 impermissibly contains subparts and/or is compound, conjunctive, or disjunctive. Respondent objects
13 to this request on the grounds it is vague and ambiguous as to the entire phrase, leaving Respondent to
14 speculate regarding the meaning of the terms "compliance," "contends," "complied," "contention," and
15 the phrases "involved in reaching that determination" and "all applicable * * * requirements" as used
16 in this request. Respondent objects to the request on the grounds it is overbroad and burdensome as to
17 scope. Respondent objects to this request to the extent it seeks private information about third parties,
18 which is protected by third party privacy rights under the Federal constitution and applicable statutes.
19 Respondent objects to this request to the extent that it seeks proprietary and confidential information,
20 and it may seek documents protected by the attorney-client privilege, the attorney work product
21 doctrine and/or other privileges, protections, or doctrines of similar effect.

22 ***Subject to and without waiving the foregoing general and specific objections, Respondent***
23 ***responds as follows:*** Respondent will produce non-confidential business records detailing any policies
24 regarding payment of wages upon employees' termination to the extent such records exist. Respondent
25 refers Claimant to *see generally* the documents produced concurrently herewith as Bates-stamped
26 DRVM 000001 – DRVM 000100. Respondent's investigation is ongoing, and discovery is continuing.
Respondent reserves the right to supplement this response upon the completion of further discovery.

1 Respondent objects on the grounds this request is vague and ambiguous as to the terms “reflecting,”
2 “calculating,” and “approval.” Respondent objects on the grounds that the request is overbroad in terms
3 of scope. Respondent objects to this request on the grounds that information sought is neither relevant
4 to the subject matter of this litigation nor reasonably calculated to lead to discoverable evidence.
5 Respondent objects to this request because it seeks information from third parties and information not
6 within its possession, custody, control, or personal knowledge. Respondent objects to the extent the
7 request seeks proprietary and confidential information and documents protected by the attorney-client
8 privilege, the attorney work product doctrine and/or other privileges, protections, or doctrines of similar
9 effect. Finally, Respondent objects to this request to the extent that it seeks information protected by
10 third party privacy rights, specifically, information in which individuals have a legitimate expectation
11 of privacy or confidentiality under the Federal constitution, applicable statutes, and/or common law.

12 ***Subject to and without waiving the foregoing objections, Respondent responds as follows:***

13 After a diligent search and reasonable inquiry, Respondent refers Claimant to documents Bates-
14 stamped DRVM 000053 and 000058. Discovery is ongoing and Respondent reserves the right to
15 supplement this response.

16 **REQUEST FOR PRODUCTION NO. 2:** Termination Records. All
17 documents reflecting Claimant’s termination, including internal communications
18 concerning final wages or final pay timing.

19 **RESPONSE TO REQUEST FOR PRODUCTION NO. 2:** Respondent objects to this request on the
20 grounds it seeks information in the possession of, known to, or otherwise equally available to Claimant.
21 Respondent objects on the grounds this request is vague and ambiguous requiring Respondent to
22 speculate as to the terms “internal,” “reflecting,” and “concerning.” Respondent objects on the grounds
23 that the request is overbroad and burdensome in terms of time and scope. Respondent objects to this
24 request on the grounds that information sought is neither relevant to the subject matter of this litigation
25 nor reasonably calculated to lead to discoverable evidence. Respondent objects to this request to the
26 extent it seeks information from third parties and information not within its possession, custody,

1 control, or personal knowledge. Respondent objects to the extent the request seeks proprietary and
2 confidential information and documents protected by the attorney-client privilege, the attorney work
3 product doctrine and/or other privileges, protections, or doctrines of similar effect. Finally, Respondent
4 objects to this request to the extent that it seeks information protected by third party privacy rights,
5 specifically, information in which individuals have a legitimate expectation of privacy or
6 confidentiality under the Federal constitution, applicable statutes, and/or common law.

7 ***Subject to and without waiving the foregoing objections, Respondent responds as follows:***

8 After a diligent search and reasonable inquiry, Respondent refers Claimant to documents Bates-
9 stamped DRVM 000053, 000059, 000060-000062, and *see generally* DRVM 000063-000100.
10 Discovery is ongoing and Respondent reserves the right to supplement this response.

11 **REQUEST FOR PRODUCTION NO. 3:** Commission Records. All
12 documents reflecting commissions earned by Claimant as of the date of
13 termination.

14 **RESPONSE TO REQUEST FOR PRODUCTION NO. 3:** Respondent objects to this request on the
15 grounds it seeks information in the possession of, known to, or otherwise equally available to Claimant.
16 Respondent objects on the grounds this request is vague and ambiguous, requiring Respondent to
17 speculate as to the term “reflecting,” and as to the phrase “as of the date of termination.” Respondent
18 objects on the grounds that the request is ambiguous in terms of the scope of the request. Respondent
19 objects to this request on the grounds that information sought is neither relevant to the subject matter
20 of this litigation nor reasonably calculated to lead to discoverable evidence. Respondent objects to this
21 request to the extent it seeks information from third parties and information not within its possession,
22 custody, control, or personal knowledge. Respondent objects to the extent the request seeks proprietary
23 and confidential information and documents protected by the attorney-client privilege, the attorney
24 work product doctrine and/or other privileges, protections, or doctrines of similar effect. Finally,
25 Respondent objects to this request to the extent that it seeks information protected by third party privacy
26 rights, specifically, information in which individuals have a legitimate expectation of privacy or
confidentiality under the Federal constitution, applicable statutes, and/or common law.

1 *Subject to and without waiving the foregoing objections, Respondent responds as follows:*

2 After a diligent search and reasonable inquiry, Respondent refers Claimant to documents Bates-
3 stamped DRVM 000052-000057, 000059. Discovery is ongoing and Respondent reserves the right to
4 supplement this response.

5 **REQUEST FOR PRODUCTION NO. 4:** Calculation Worksheets. All
6 spreadsheets, worksheets, summaries, or internal records used to calculate
7 Claimant's final wages or any statutory penalties.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 4:** Respondent objects on the grounds this
9 request is vague and ambiguous, requiring Respondent to speculate as to the meaning and scope of the
10 entire request. Respondent objects to this request on the grounds that information sought is neither
11 relevant to the subject matter of this litigation nor reasonably calculated to lead to discoverable
12 evidence. Respondent objects to this request to the extent it seeks information from third parties and
13 information not within its possession, custody, control, or personal knowledge. Respondent objects to
14 the extent the request seeks proprietary and confidential information and documents protected by the
15 attorney-client privilege, the attorney work product doctrine and/or other privileges, protections, or
16 doctrines of similar effect. Finally, Respondent objects to this request to the extent that it seeks
17 information protected by third party privacy rights, specifically, information in which individuals have
18 a legitimate expectation of privacy or confidentiality under the Federal constitution, applicable statutes,
19 and/or common law.

20 *Subject to and without waiving the foregoing objections, Respondent responds as follows:*

21 After a diligent search and reasonable inquiry, Respondent refers Claimant to documents Bates-
22 stamped DRVM 000052-000057, 000059, *see also* DRVM 000099-000100. Discovery is ongoing and
23 Respondent reserves the right to supplement this response.

24 **REQUEST FOR PRODUCTION NO. 5:** Payroll Provider
25 Communications. All communications between DRVM LLC and any payroll
26 provider or payroll service regarding instructions, approvals, delays, or timing
decisions concerning the calculation or issuance of Claimant's final wages.

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 5:** Respondent objects on the grounds this
2 request is vague and ambiguous, requiring Respondent to speculate as to the meaning of the terms
3 “instructions,” “approvals,” “delays,” and the phrase “timing decisions.” Respondent objects to this
4 request on the grounds that information sought is neither relevant to the subject matter of this litigation
5 nor reasonably calculated to lead to discoverable evidence. Respondent objects to this request because
6 it seeks information from third parties and information not within its possession, custody, control, or
7 personal knowledge. Respondent objects to the extent the request seeks proprietary and confidential
8 information and documents protected by the attorney-client privilege, the attorney work product
9 doctrine and/or other privileges, protections, or doctrines of similar effect. Finally, Respondent objects
10 to this request to the extent that it seeks information protected by third party privacy rights, specifically,
11 information in which individuals have a legitimate expectation of privacy or confidentiality under the
12 Federal constitution, applicable statutes, and/or common law.

13 ***Subject to and without waiving the foregoing objections, Respondent responds as follows:***

14 After a diligent search and reasonable inquiry, Respondent refers Claimant to documents Bates-
15 stamped DRVM 000060-0000097. Discovery is ongoing and Respondent reserves the right to
16 supplement this response.

17 **REQUEST FOR PRODUCTION NO. 6:** Payment Timing Records. All
18 documents reflecting when and how Claimant’s final wages were issued, including
19 payroll registers, bank confirmations, or payment authorizations.

20 **RESPONSE TO REQUEST FOR PRODUCTION NO. 6:** Respondent objects on the grounds this
21 request is vague and ambiguous, requiring Respondent to speculate as to the meaning of the terms
22 “reflecting,” “final wages,” and the phrase “payroll registers, bank confirmations, or payment
23 authorizations.” Respondent objects on the grounds that the request is overbroad and burdensome in
24 terms of scope and time. Respondent objects to this request on the grounds that the information sought
25 is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to
26 discoverable evidence. Respondent objects to this request because it seeks information from third

1 parties and information not within its possession, custody, control, or personal knowledge. Respondent
2 objects to the extent the request seeks proprietary and confidential information and documents protected
3 by the attorney-client privilege, the attorney work product doctrine and/or other privileges, protections,
4 or doctrines of similar effect. Finally, Respondent objects to this request to the extent that it seeks
5 information protected by third party privacy rights, specifically, information in which individuals have
6 a legitimate expectation of privacy or confidentiality under the Federal constitution, applicable statutes,
7 and/or common law.

8 ***Subject to and without waiving the foregoing objections, Respondent responds as follows:***

9 After a diligent search and reasonable inquiry, Respondent refers Claimant to documents Bates-
10 stamped DRVM 000059. Discovery is ongoing and Respondent reserves the right to supplement this
11 response.

12 **REQUEST FOR PRODUCTION NO. 7: Policies and Training Materials.**

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

15 **RESPONSE TO REQUEST FOR PRODUCTION NO. 7:** Respondent objects on the grounds this
16 request is vague and ambiguous in its entirety, requiring Respondent to speculate as to what documents
17 are actually being requested. Respondent objects to this request on the grounds that information sought
18 is neither relevant to the subject matter of this litigation nor reasonably calculated to lead to
19 discoverable evidence. Respondent objects to this request because it seeks information from third
20 parties and information not within its possession, custody, control, or personal knowledge. Respondent
21 objects to the extent the request seeks proprietary and confidential information and documents protected
22 by the attorney-client privilege, the attorney work product doctrine and/or other privileges, protections,
23 or doctrines of similar effect. Finally, Respondent objects to this request to the extent that it seeks
24 information protected by third party privacy rights, specifically, information in which individuals have
25 a legitimate expectation of privacy or confidentiality under the Federal constitution, applicable statutes,
26 and/or common law.

1 *Subject to and without waiving the foregoing objections, Respondent responds as follows:*

2 After a diligent search and reasonable inquiry, Respondent refers Claimant to documents Bates-
3 stamped DRVM 000001-000051. Discovery is ongoing and Respondent reserves the right to
4 supplement this response.

5 **REQUEST FOR PRODUCTION NO. 8:** Post-Termination Payments or
6 Adjustments. All documents reflecting any post-termination payments,
7 adjustments, corrections, or recalculations made to Claimant’s wages.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 8:** Respondent objects to this request
9 because it seeks information in the possession of, known to, or otherwise equally available to Claimant.
10 Respondent objects on the grounds this request is vague and ambiguous, requiring Respondent to
11 speculate as to the meaning of the terms “reflecting,” “adjustments,” “corrections,” “recalculations”
12 and the phrases “post-termination payments,” and “Claimant’s wages.” Respondent objects to this
13 request on the grounds that information sought is neither relevant to the subject matter of this litigation
14 nor reasonably calculated to lead to discoverable evidence. Respondent objects to this request to the
15 extent it seeks information from third parties and information not within its possession, custody,
16 control, or personal knowledge. Respondent objects to the extent the request seeks proprietary and
17 confidential information and documents protected by the attorney-client privilege, the attorney work
18 product doctrine and/or other privileges, protections, or doctrines of similar effect. Finally, Respondent
19 objects to this request to the extent that it seeks information protected by third party privacy rights,
20 specifically, information in which individuals have a legitimate expectation of privacy or
21 confidentiality under the Federal constitution, applicable statutes, and/or common law.

22 *Subject to and without waiving the foregoing objections, Respondent responds as follows:*

23 After a diligent search and reasonable inquiry, Respondent refers Claimant to documents Bates-
24 stamped DRVM 000052, 000053, 000058, 000059, and *see generally* DRVM 000060-000100.
25 Discovery is ongoing and Respondent reserves the right to supplement this response.

1 **REQUEST FOR PRODUCTION NO. 9:** Compliance Reliance
2 Documents. All documents DRVM LLC reviewed, considered, or relied upon in
3 determining that Claimant’s final wages were timely and fully paid.

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 9:** Respondent objects on the grounds this
5 request is vague and ambiguous, requiring Respondent to speculate as to the meaning and scope of the
6 terms “timely,” “fully,” and the phrases “compliance reliance,” and “reviewed, considered, or relied
7 upon,” and “Claimant’s final wages.” Respondent objects to this request because it seeks information
8 from third parties and information not within its possession, custody, control, or personal knowledge.
9 Respondent objects to the extent the request seeks proprietary and confidential information and
10 documents protected by the attorney-client privilege, the attorney work product doctrine and/or other
11 privileges, protections, or doctrines of similar effect. Finally, Respondent objects to this request to the
12 extent that it seeks information protected by third party privacy rights, specifically, information in
13 which individuals have a legitimate expectation of privacy or confidentiality under the Federal
14 constitution, applicable statutes, and/or common law.

15 *Subject to and without waiving the foregoing objections, Respondent responds as follows:*

16 After a diligent search and reasonable inquiry, Respondent refers Claimant to documents Bates-
17 stamped DRVM 000060-0000100. Discovery is ongoing and Respondent reserves the right to
18 supplement this response.

19 **REQUEST FOR PRODUCTION NO. 10:** Decision Authority
20 Documents. All documents reflecting or evidencing who authorized, approved, or
21 controlled the timing of Claimant’s final wage payment, including instructions to
22 payroll personnel or third-party processors.

23 **RESPONSE TO REQUEST FOR PRODUCTION NO. 10:** Respondent objects on the grounds this
24 request is vague and ambiguous, requiring Respondent to speculate as to the meaning and scope of the
25 terms “reflecting,” “evidencing,” and the phrases “decision authority,” and “who authorized, approved,
26 or controlled the timing,” and “Claimant’s final wage payment.” Respondent objects to this request on
the grounds that information sought is neither relevant to the subject matter of this litigation nor
reasonably calculated to lead to discoverable evidence. Respondent objects to this request because it

1 seeks information from third parties and information not within its possession, custody, control, or
2 personal knowledge. Respondent objects to the extent the request seeks proprietary and confidential
3 information and documents protected by the attorney-client privilege, the attorney work product
4 doctrine and/or other privileges, protections, or doctrines of similar effect. Finally, Respondent objects
5 to this request to the extent that it seeks information protected by third party privacy rights, specifically,
6 information in which individuals have a legitimate expectation of privacy or confidentiality under the
7 Federal constitution, applicable statutes, and/or common law.

8 ***Subject to and without waiving the foregoing objections, Respondent responds as follows:***

9 After a diligent search and reasonable inquiry, Respondent refers Claimant to documents Bates-
10 stamped DRVM 000060-0000100. Discovery is ongoing and Respondent reserves the right to
11 supplement this response.

12 DATED this 26th day of February 2026.

13 FISHER & PHILLIPS LLP

14 

15 _____
16 Stephen M. Scott, OSB No. 134800

17 smscott@fisherphillips.com

18 Bobbi J. Edwards, OSB No. 211574

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20 503.242.4262 Tel.

21 503.242.4263 Fax

22 Attorneys for Respondent DRVM LLC
23
24
25
26

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on the date written below, I caused a true and correct copy of the
3 foregoing document to be served on the following party via the method(s) indicated:

4 Jorden Hollingsworth
5 PO Box 16142
6 Portland, OR 97292

7 *Claimant Pro Se*

First-Class Mail, postage prepaid

Email (courtesy only)
jordentimothy11@gmail.com

8
9 DATED this 26th day of February 2026.

10 FISHER & PHILLIPS LLP

11 

12
13 _____
Bobbi J. Edwards, OSB No. 211574

14 Attorneys for Respondent DRVM LLC