

In The Matter Of:
RIVERBEND SUPPLY COMPANY v.
HARBORLINE LOGISTICS, INC.

JORDAN AVERY SAMPLE
March 7, 2024

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1	SUPERIOR COURT OF THE STATE OF CALIFORNIA	1	I N D E X
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3	FOR THE COUNTY OF EXAMPLE VALLEY	3	
4		4	WITNESS: JORDAN AVERY SAMPLE
5		5	
6	RIVERBEND SUPPLY COMPANY,)	6	EXAMINATION PAGE
7	)	7	
8	Plaintiff,)	8	BY MR. WHITFIELD 5
9	) Case No. 24-CV-000123	9	
10	vs.)	10	
11	)	11	
12	HARBORLINE LOGISTICS, INC.,)	12	
13	)	13	
14	Defendant.)	14	
15		15	
16		16	
17	DEPOSITION OF JORDAN AVERY SAMPLE	17	
18		18	
19	March 7, 2024	19	
20		20	
21	Reported by:	21	
22	Casey L. Stenwright, CSR No. 9021	22	
23		23	
24		24	
25		25	
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1	APPEARANCES:	1	E X H I B I T S
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3	For the Plaintiff:	3	EXHIBIT DESCRIPTION PAGE
4		4	
5	WHITFIELD & MARSH LLP, BY: MR. WHITFIELD	5	Exhibit 1 Warehouse safety manual 6
6		6	
7		7	Exhibit 2 Loading dock schedule 12
8	For the Defendant:	8	
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10	OKONKWO LEGAL GROUP, BY: MS. OKONKWO	10	
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1 EXAMINATION BY MR. WHITFIELD 2 BY MR. WHITFIELD: 3 A. At the distribution center in Millbrook. 4 because the drivers needed a signature on each manifest 5 although nobody mentioned the scheduling change to me 6 MS. OKONKWO: Objection; vague as to time. 7 Q. Who supervised the dock on the night shift? 8 so I wrote the numbers down on the clipboard by the door 9 A. A shift lead named Parker handled the dock. 10 although nobody mentioned the scheduling change to me 11 so I wrote the numbers down on the clipboard by the door 12 MS. OKONKWO: Objection; vague as to time. 13 Q. Did anyone review the schedule with you? 14 and the paperwork went to the front office afterward 15 A. Yes, the coordinator went over it every Monday. 16 so I wrote the numbers down on the clipboard by the door 17 and the paperwork went to the front office afterward 18 MS. OKONKWO: Objection; vague as to time. 19 Q. How often was the forklift inspected? 20 because the drivers needed a signature on each manifest 21 A. Usually twice a week, sometimes more often. 22 and the paperwork went to the front office afterward 23 because the drivers needed a signature on each manifest 24 MS. OKONKWO: Objection; vague as to time. 25 Q. What did the maintenance log show for that week?		1 A. I had read portions of it during orientation. 2 so I wrote the numbers down on the clipboard by the door 3 and the paperwork went to the front office afterward 4 MS. OKONKWO: Objection; vague as to time. 5 Q. Why was the north entrance closed that morning? 6 because the drivers needed a signature on each manifest 7 A. They were repainting the loading area. 8 and the paperwork went to the front office afterward 9 because the drivers needed a signature on each manifest 10 MS. OKONKWO: Objection; vague as to time. 11 Q. Where were you employed in the spring? 12 although nobody mentioned the scheduling change to me 13 A. At the distribution center in Millbrook. 14 because the drivers needed a signature on each manifest 15 although nobody mentioned the scheduling change to me 16 MS. OKONKWO: Objection; vague as to time. 17 Q. Who supervised the dock on the night shift? 18 so I wrote the numbers down on the clipboard by the door 19 A. A shift lead named Parker handled the dock. 20 although nobody mentioned the scheduling change to me 21 so I wrote the numbers down on the clipboard by the door 22 MS. OKONKWO: Objection; vague as to time. 23 Q. Did anyone review the schedule with you? 24 and the paperwork went to the front office afterward 25 A. Yes, the coordinator went over it every Monday.	
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1 because the drivers needed a signature on each manifest 2 A. Usually twice a week, sometimes more often. 3 and the paperwork went to the front office afterward 4 (Marked Deposition Exhibit 1) 5 MS. OKONKWO: Objection; vague as to time. 6 Q. Please look at Exhibit 1 for a moment. 7 although nobody mentioned the scheduling change to me 8 A. It showed two repairs on the conveyor belt. 9 because the drivers needed a signature on each manifest 10 although nobody mentioned the scheduling change to me 11 MS. OKONKWO: Objection; vague as to time. 12 Q. When did you first notice the damaged pallet? 13 so I wrote the numbers down on the clipboard by the door 14 A. Right after the second truck arrived. 15 although nobody mentioned the scheduling change to me 16 so I wrote the numbers down on the clipboard by the door 17 MS. OKONKWO: Objection; vague as to time. 18 Q. Had you seen the manual before that day? 19 and the paperwork went to the front office afterward 20 A. I had read portions of it during orientation. 21 so I wrote the numbers down on the clipboard by the door 22 and the paperwork went to the front office afterward 23 MS. OKONKWO: Objection; vague as to time. 24 Q. Why was the north entrance closed that morning? 25 because the drivers needed a signature on each manifest		1 because the drivers needed a signature on each manifest 2 although nobody mentioned the scheduling change to me 3 MS. OKONKWO: Objection; vague as to time. 4 Q. Who supervised the dock on the night shift? 5 so I wrote the numbers down on the clipboard by the door 6 A. A shift lead named Parker handled the dock. 7 although nobody mentioned the scheduling change to me 8 so I wrote the numbers down on the clipboard by the door 9 MS. OKONKWO: Objection; vague as to time. 10 Q. Did anyone review the schedule with you? 11 and the paperwork went to the front office afterward 12 A. Yes, the coordinator went over it every Monday. 13 so I wrote the numbers down on the clipboard by the door 14 and the paperwork went to the front office afterward 15 MS. OKONKWO: Objection; vague as to time. 16 Q. How often was the forklift inspected? 17 because the drivers needed a signature on each manifest 18 A. Usually twice a week, sometimes more often. 19 and the paperwork went to the front office afterward 20 because the drivers needed a signature on each manifest 21 MS. OKONKWO: Objection; vague as to time. 22 Q. What did the maintenance log show for that week? 23 although nobody mentioned the scheduling change to me 24 A. It showed two repairs on the conveyor belt. 25 because the drivers needed a signature on each manifest	

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1 because the drivers needed a signature on each manifest 2 MS. OKONKWO: Objection; vague as to time. 3 Q. What did the maintenance log show for that week? 4 although nobody mentioned the scheduling change to me 5 A. It showed two repairs on the conveyor belt. 6 because the drivers needed a signature on each manifest 7 although nobody mentioned the scheduling change to me 8 MS. OKONKWO: Objection; vague as to time. 9 Q. When did you first notice the damaged pallet? 10 so I wrote the numbers down on the clipboard by the door 11 A. Right after the second truck arrived. 12 although nobody mentioned the scheduling change to me 13 so I wrote the numbers down on the clipboard by the door 14 MS. OKONKWO: Objection; vague as to time. 15 Q. Had you seen the manual before that day? 16 and the paperwork went to the front office afterward 17 A. I had read portions of it during orientation. 18 so I wrote the numbers down on the clipboard by the door 19 and the paperwork went to the front office afterward 20 MS. OKONKWO: Objection; vague as to time. 21 Q. Why was the north entrance closed that morning? 22 because the drivers needed a signature on each manifest 23 A. They were repainting the loading area. 24 and the paperwork went to the front office afterward 25 because the drivers needed a signature on each manifest	1 Q. Did anyone review the schedule with you? 2 and the paperwork went to the front office afterward 3 A. Yes, the coordinator went over it every Monday. 4 so I wrote the numbers down on the clipboard by the door 5 and the paperwork went to the front office afterward 6 MS. OKONKWO: Objection; vague as to time. 7 Q. How often was the forklift inspected? 8 because the drivers needed a signature on each manifest 9 A. Usually twice a week, sometimes more often. 10 and the paperwork went to the front office afterward 11 because the drivers needed a signature on each manifest 12 MS. OKONKWO: Objection; vague as to time. 13 Q. What did the maintenance log show for that week? 14 although nobody mentioned the scheduling change to me 15 A. It showed two repairs on the conveyor belt. 16 because the drivers needed a signature on each manifest 17 although nobody mentioned the scheduling change to me 18 MS. OKONKWO: Objection; vague as to time. 19 Q. When did you first notice the damaged pallet? 20 so I wrote the numbers down on the clipboard by the door 21 A. Right after the second truck arrived. 22 although nobody mentioned the scheduling change to me 23 so I wrote the numbers down on the clipboard by the door 24 MS. OKONKWO: Objection; vague as to time. 25 Q. Had you seen the manual before that day?		
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1 MS. OKONKWO: Objection; vague as to time. 2 Q. Why was the north entrance closed that morning? 3 because the drivers needed a signature on each manifest 4 A. They were repainting the loading area. 5 and the paperwork went to the front office afterward 6 because the drivers needed a signature on each manifest 7 MS. OKONKWO: Objection; vague as to time. 8 Q. Where were you employed in the spring? 9 although nobody mentioned the scheduling change to me 10 A. At the distribution center in Millbrook. 11 because the drivers needed a signature on each manifest 12 although nobody mentioned the scheduling change to me 13 MS. OKONKWO: Objection; vague as to time. 14 Q. Who supervised the dock on the night shift? 15 so I wrote the numbers down on the clipboard by the door 16 A. A shift lead named Parker handled the dock. 17 although nobody mentioned the scheduling change to me 18 so I wrote the numbers down on the clipboard by the door 19 MS. OKONKWO: Objection; vague as to time. 20 Q. Did anyone review the schedule with you? 21 and the paperwork went to the front office afterward 22 A. Yes, the coordinator went over it every Monday. 23 so I wrote the numbers down on the clipboard by the door 24 and the paperwork went to the front office afterward 25 MS. OKONKWO: Objection; vague as to time.	1 so I wrote the numbers down on the clipboard by the door 2 A. Right after the second truck arrived. 3 although nobody mentioned the scheduling change to me 4 (Marked Deposition Exhibit 2) 5 MS. OKONKWO: Objection; vague as to time. 6 Q. Please look at Exhibit 2 for a moment. 7 and the paperwork went to the front office afterward 8 A. I had read portions of it during orientation. 9 so I wrote the numbers down on the clipboard by the door 10 and the paperwork went to the front office afterward 11 MS. OKONKWO: Objection; vague as to time. 12 Q. Why was the north entrance closed that morning? 13 because the drivers needed a signature on each manifest 14 A. They were repainting the loading area. 15 and the paperwork went to the front office afterward 16 because the drivers needed a signature on each manifest 17 MS. OKONKWO: Objection; vague as to time. 18 Q. Where were you employed in the spring? 19 although nobody mentioned the scheduling change to me 20 A. At the distribution center in Millbrook. 21 because the drivers needed a signature on each manifest 22 although nobody mentioned the scheduling change to me 23 MS. OKONKWO: Objection; vague as to time. 24 Q. Who supervised the dock on the night shift? 25 so I wrote the numbers down on the clipboard by the door		

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REPORTER'S CERTIFICATE

I, the undersigned, a Certified Shorthand Reporter
of the State of California, do hereby certify:

That the foregoing proceedings were taken before me
at the time and place therein set forth, at which
time the witness was placed under oath by me;

That the testimony of the witness was recorded by
me in shorthand and transcribed under my direction;

I further certify that I am neither counsel for nor
related to any party to said action.

Dated: March 21, 2024



Casey L. Stenwright, CSR No. 9021

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DECLARATION UNDER PENALTY OF PERJURY

I, the undersigned, declare under penalty of perjury
under the laws of the State of California that I have
read the foregoing transcript and that it is true and
correct, subject to any changes on the errata sheet.

Executed on the ____ day of _____, 2024,
at _____, California.

JORDAN AVERY SAMPLE

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ERRATA SHEET

Deposition of JORDAN AVERY SAMPLE

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Signature: _____

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ERRATA SHEET

Deposition of JORDAN AVERY SAMPLE

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Signature: _____

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EXHIBIT 1

Warehouse safety manual

Marked for identification at page 6, line 4

Synthetic Exhibit 1

EXHIBIT 2

Loading dock schedule

Marked for identification at page 12, line 4

Synthetic Exhibit 2