

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

JORDAN AVERY SAMPLE
March 7, 2024

1 SUPERIOR COURT OF THE STATE OF CALIFORNIA

2
3 FOR THE COUNTY OF EXAMPLE VALLEY

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5
6 RIVERBEND SUPPLY COMPANY,)

7)

8 Plaintiff,)

9)

Case No. 24-CV-000123

10 vs.)

11)

12 HARBORLINE LOGISTICS, INC.,)

13)

14 Defendant.)

15 _____

16
17 DEPOSITION OF JORDAN AVERY SAMPLE

18
19 March 7, 2024

20
21 Reported by:

22 Casey L. Stenwright, CSR No. 9021

23

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25

1 APPEARANCES:

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3 For the Plaintiff:

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5 WHITFIELD & MARSH LLP, BY: MR. WHITFIELD

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8 For the Defendant:

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10 OKONKWO LEGAL GROUP, BY: MS. OKONKWO

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I N D E X

WITNESS: JORDAN AVERY SAMPLE

EXAMINATION

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BY MR. WHITFIELD

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E X H I B I T S

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09:30:00AM 1

EXAMINATION BY MR. WHITFIELD

09:30:07AM 2

BY MR. WHITFIELD:

09:30:14AM 3

A. At the distribution center in Millbrook.

09:30:21AM 4

because the drivers needed a signature on each manifest

09:30:28AM 5

although nobody mentioned the scheduling change to me

09:30:35AM 6

MS. OKONKWO: Objection; vague as to time.

09:30:42AM 7

Q. Who supervised the dock on the night shift?

09:30:49AM 8

so I wrote the numbers down on the clipboard by the door

09:30:56AM 9

A. A shift lead named Parker handled the dock.

09:31:03AM 10

although nobody mentioned the scheduling change to me

09:31:10AM 11

so I wrote the numbers down on the clipboard by the door

09:31:17AM 12

MS. OKONKWO: Objection; vague as to time.

09:31:24AM 13

Q. Did anyone review the schedule with you?

09:31:31AM 14

and the paperwork went to the front office afterward

09:31:38AM 15

A. Yes, the coordinator went over it every Monday.

09:31:45AM 16

so I wrote the numbers down on the clipboard by the door

09:31:52AM 17

and the paperwork went to the front office afterward

09:31:59AM 18

MS. OKONKWO: Objection; vague as to time.

09:32:06AM 19

Q. How often was the forklift inspected?

09:32:13AM 20

because the drivers needed a signature on each manifest

09:32:20AM 21

A. Usually twice a week, sometimes more often.

09:32:27AM 22

and the paperwork went to the front office afterward

09:32:34AM 23

because the drivers needed a signature on each manifest

09:32:41AM 24

MS. OKONKWO: Objection; vague as to time.

09:32:48AM 25

Q. What did the maintenance log show for that week?

09:32:55AM 1 because the drivers needed a signature on each manifest

09:33:02AM 2 A. Usually twice a week, sometimes more often.

09:33:09AM 3 and the paperwork went to the front office afterward

09:33:16AM 4 (Marked Deposition [Exhibit 1](#))

09:33:23AM 5 MS. OKONKWO: Objection; vague as to time.

09:33:30AM 6 Q. Please look at [Exhibit 1](#) for a moment.

09:33:37AM 7 although nobody mentioned the scheduling change to me

09:33:44AM 8 A. It showed two repairs on the conveyor belt.

09:33:51AM 9 because the drivers needed a signature on each manifest

09:33:58AM 10 although nobody mentioned the scheduling change to me

09:34:05AM 11 MS. OKONKWO: Objection; vague as to time.

09:34:12AM 12 Q. When did you first notice the damaged pallet?

09:34:19AM 13 so I wrote the numbers down on the clipboard by the door

09:34:26AM 14 A. Right after the second truck arrived.

09:34:33AM 15 although nobody mentioned the scheduling change to me

09:34:40AM 16 so I wrote the numbers down on the clipboard by the door

09:34:47AM 17 MS. OKONKWO: Objection; vague as to time.

09:34:54AM 18 Q. Had you seen the manual before that day?

09:35:01AM 19 and the paperwork went to the front office afterward

09:35:08AM 20 A. I had read portions of it during orientation.

09:35:15AM 21 so I wrote the numbers down on the clipboard by the door

09:35:22AM 22 and the paperwork went to the front office afterward

09:35:29AM 23 MS. OKONKWO: Objection; vague as to time.

09:35:36AM 24 Q. Why was the north entrance closed that morning?

09:35:43AM 25 because the drivers needed a signature on each manifest

09:35:50AM 1 A. I had read portions of it during orientation.
09:35:57AM 2 so I wrote the numbers down on the clipboard by the door
09:36:04AM 3 and the paperwork went to the front office afterward

09:36:11AM 4 MS. OKONKWO: Objection; vague as to time.

09:36:18AM 5 Q. Why was the north entrance closed that morning?
09:36:25AM 6 because the drivers needed a signature on each manifest

09:36:32AM 7 A. They were repainting the loading area.
09:36:39AM 8 and the paperwork went to the front office afterward
09:36:46AM 9 because the drivers needed a signature on each manifest

09:36:53AM 10 MS. OKONKWO: Objection; vague as to time.

09:37:00AM 11 Q. Where were you employed in the spring?
09:37:07AM 12 although nobody mentioned the scheduling change to me

09:37:14AM 13 A. At the distribution center in Millbrook.
09:37:21AM 14 because the drivers needed a signature on each manifest
09:37:28AM 15 although nobody mentioned the scheduling change to me

09:37:35AM 16 MS. OKONKWO: Objection; vague as to time.

09:37:42AM 17 Q. Who supervised the dock on the night shift?
09:37:49AM 18 so I wrote the numbers down on the clipboard by the door

09:37:56AM 19 A. A shift lead named Parker handled the dock.
09:38:03AM 20 although nobody mentioned the scheduling change to me
09:38:10AM 21 so I wrote the numbers down on the clipboard by the door

09:38:17AM 22 MS. OKONKWO: Objection; vague as to time.

09:38:24AM 23 Q. Did anyone review the schedule with you?
09:38:31AM 24 and the paperwork went to the front office afterward

09:38:38AM 25 A. Yes, the coordinator went over it every Monday.

09:38:45AM 1 because the drivers needed a signature on each manifest

09:38:52AM 2 although nobody mentioned the scheduling change to me

09:38:59AM 3 MS. OKONKWO: Objection; vague as to time.

09:39:06AM 4 Q. Who supervised the dock on the night shift?

09:39:13AM 5 so I wrote the numbers down on the clipboard by the door

09:39:20AM 6 A. A shift lead named Parker handled the dock.

09:39:27AM 7 although nobody mentioned the scheduling change to me

09:39:34AM 8 so I wrote the numbers down on the clipboard by the door

09:39:41AM 9 MS. OKONKWO: Objection; vague as to time.

09:39:48AM10 Q. Did anyone review the schedule with you?

09:39:55AM11 and the paperwork went to the front office afterward

09:40:02AM12 A. Yes, the coordinator went over it every Monday.

09:40:09AM13 so I wrote the numbers down on the clipboard by the door

09:40:16AM14 and the paperwork went to the front office afterward

09:40:23AM15 MS. OKONKWO: Objection; vague as to time.

09:40:30AM16 Q. How often was the forklift inspected?

09:40:37AM17 because the drivers needed a signature on each manifest

09:40:44AM18 A. Usually twice a week, sometimes more often.

09:40:51AM19 and the paperwork went to the front office afterward

09:40:58AM20 because the drivers needed a signature on each manifest

09:41:05AM21 MS. OKONKWO: Objection; vague as to time.

09:41:12AM22 Q. What did the maintenance log show for that week?

09:41:19AM23 although nobody mentioned the scheduling change to me

09:41:26AM24 A. It showed two repairs on the conveyor belt.

09:41:33AM25 because the drivers needed a signature on each manifest

09:41:40AM 1 because the drivers needed a signature on each manifest

09:41:47AM 2 MS. OKONKWO: Objection; vague as to time.

09:41:54AM 3 Q. What did the maintenance log show for that week?

09:42:01AM 4 although nobody mentioned the scheduling change to me

09:42:08AM 5 A. It showed two repairs on the conveyor belt.

09:42:15AM 6 because the drivers needed a signature on each manifest

09:42:22AM 7 although nobody mentioned the scheduling change to me

09:42:29AM 8 MS. OKONKWO: Objection; vague as to time.

09:42:36AM 9 Q. When did you first notice the damaged pallet?

09:42:43AM10 so I wrote the numbers down on the clipboard by the door

09:42:50AM11 A. Right after the second truck arrived.

09:42:57AM12 although nobody mentioned the scheduling change to me

09:43:04AM13 so I wrote the numbers down on the clipboard by the door

09:43:11AM14 MS. OKONKWO: Objection; vague as to time.

09:43:18AM15 Q. Had you seen the manual before that day?

09:43:25AM16 and the paperwork went to the front office afterward

09:43:32AM17 A. I had read portions of it during orientation.

09:43:39AM18 so I wrote the numbers down on the clipboard by the door

09:43:46AM19 and the paperwork went to the front office afterward

09:43:53AM20 MS. OKONKWO: Objection; vague as to time.

09:44:00AM21 Q. Why was the north entrance closed that morning?

09:44:07AM22 because the drivers needed a signature on each manifest

09:44:14AM23 A. They were repainting the loading area.

09:44:21AM24 and the paperwork went to the front office afterward

09:44:28AM25 because the drivers needed a signature on each manifest

09:44:35AM 1 MS. OKONKWO: Objection; vague as to time.

09:44:42AM 2 Q. Why was the north entrance closed that morning?

09:44:49AM 3 because the drivers needed a signature on each manifest

09:44:56AM 4 A. They were repainting the loading area.

09:45:03AM 5 and the paperwork went to the front office afterward

09:45:10AM 6 because the drivers needed a signature on each manifest

09:45:17AM 7 MS. OKONKWO: Objection; vague as to time.

09:45:24AM 8 Q. Where were you employed in the spring?

09:45:31AM 9 although nobody mentioned the scheduling change to me

09:45:38AM 10 A. At the distribution center in Millbrook.

09:45:45AM 11 because the drivers needed a signature on each manifest

09:45:52AM 12 although nobody mentioned the scheduling change to me

09:45:59AM 13 MS. OKONKWO: Objection; vague as to time.

09:46:06AM 14 Q. Who supervised the dock on the night shift?

09:46:13AM 15 so I wrote the numbers down on the clipboard by the door

09:46:20AM 16 A. A shift lead named Parker handled the dock.

09:46:27AM 17 although nobody mentioned the scheduling change to me

09:46:34AM 18 so I wrote the numbers down on the clipboard by the door

09:46:41AM 19 MS. OKONKWO: Objection; vague as to time.

09:46:48AM 20 Q. Did anyone review the schedule with you?

09:46:55AM 21 and the paperwork went to the front office afterward

09:47:02AM 22 A. Yes, the coordinator went over it every Monday.

09:47:09AM 23 so I wrote the numbers down on the clipboard by the door

09:47:16AM 24 and the paperwork went to the front office afterward

09:47:23AM 25 MS. OKONKWO: Objection; vague as to time.

09:47:30AM 1 Q. Did anyone review the schedule with you?
09:47:37AM 2 and the paperwork went to the front office afterward

09:47:44AM 3 A. Yes, the coordinator went over it every Monday.
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09:47:58AM 5 and the paperwork went to the front office afterward

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09:48:19AM 8 because the drivers needed a signature on each manifest

09:48:26AM 9 A. Usually twice a week, sometimes more often.
09:48:33AM 10 and the paperwork went to the front office afterward
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09:49:15AM 16 because the drivers needed a signature on each manifest
09:49:22AM 17 although nobody mentioned the scheduling change to me

09:49:29AM 18 MS. OKONKWO: Objection; vague as to time.

09:49:36AM 19 Q. When did you first notice the damaged pallet?
09:49:43AM 20 so I wrote the numbers down on the clipboard by the door

09:49:50AM 21 A. Right after the second truck arrived.
09:49:57AM 22 although nobody mentioned the scheduling change to me
09:50:04AM 23 so I wrote the numbers down on the clipboard by the door

09:50:11AM 24 MS. OKONKWO: Objection; vague as to time.

09:50:18AM 25 Q. Had you seen the manual before that day?

09:50:25AM 1 so I wrote the numbers down on the clipboard by the door

09:50:32AM 2 A. Right after the second truck arrived.

09:50:39AM 3 although nobody mentioned the scheduling change to me

09:50:46AM 4 (Marked Deposition [Exhibit 2](#))

09:50:53AM 5 MS. OKONKWO: Objection; vague as to time.

09:51:00AM 6 Q. Please look at [Exhibit 2](#) for a moment.

09:51:07AM 7 and the paperwork went to the front office afterward

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09:52:38AM 20 A. At the distribution center in Millbrook.

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09:52:52AM 22 although nobody mentioned the scheduling change to me

09:52:59AM 23 MS. OKONKWO: Objection; vague as to time.

09:53:06AM 24 Q. Who supervised the dock on the night shift?

09:53:13AM 25 so I wrote the numbers down on the clipboard by the door

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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ERRATA SHEET

Deposition of JORDAN AVERY SAMPLE

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Signature: _____

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belt (4) 6:8;8:24;9:5; 11:15	employed (3) 7:11; 10:8;12:18 entrance (5) 6:24;7:5; 9:21;10:2;12:12 EXAMINATION (1) 5:1 Exhibit (4) 6:4,6;12:4,6	named (4) 5:9;7:19;8:6; 10:16 needed (26) 5:4,20,23; 6:1,9,25;7:6,9,14;8:1, 17,20,25;9:1,6,22,25; 10:3,6,11;11:8,11,16; 12:13,16,21 night (5) 5:7;7:17;8:4; 10:14;12:24 nobody (23) 5:5,10;6:7, 10,15;7:12,15,20;8:2, 7,23;9:4,7,12;10:9, 12,17;11:14,17,22; 12:3,19,22 north (5) 6:24;7:5;9:21; 10:2;12:12 notice (3) 6:12;9:9; 11:19 numbers (24) 5:8,11, 16;6:13,16,21;7:2,18, 21;8:5,8,13;9:10,13, 18;10:15,18,23;11:4, 20,23;12:1,9,25	read (4) 6:20;7:1;9:17; 12:8 repainting (4) 7:7;9:23; 10:4;12:14 repairs (4) 6:8;8:24; 9:5;11:15 review (5) 5:13;7:23; 8:10;10:20;11:1 Right (4) 6:14;9:11; 11:21;12:2	Usually (4) 5:21;6:2; 8:18;11:9
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damaged (3) 6:12;9:9; 11:19 day (3) 6:18;9:15;11:25 Deposition (2) 6:4;12:4 distribution (4) 5:3; 7:13;10:10;12:20 dock (9) 5:7,9;7:17,19; 8:4,6;10:14,16;12:24 door (24) 5:8,11,16; 6:13,16,21;7:2,18,21; 8:5,8,13;9:10,13,18; 10:15,18,23;11:4,20, 23;12:1,9,25 down (24) 5:8,11,16; 6:13,16,21;7:2,18,21; 8:5,8,13;9:10,13,18; 10:15,18,23;11:4,20,	handled (4) 5:9;7:19; 8:6;10:16			week (8) 5:21,25;6:2; 8:18,22;9:3;11:9,13 WHITFIELD (2) 5:1,2 wrote (24) 5:8,11,16; 6:13,16,21;7:2,18,21; 8:5,8,13;9:10,13,18; 10:15,18,23;11:4,20, 23;12:1,9,25
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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