

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

3 FOR THE COUNTY OF EXAMPEE VALLEY

6 RIVERBEND SUPPLY COMPANY,

8 Plaintiff,

Case No. 24-CV-000123

10 vs

12 HARBORLINE LOGISTICS, INC.,

14 Defendant.

16 DEPOSITION OF JORDAN AVERY SAMPLE

18 March 7, 2024

20 Reported by

22 Case L. Sternwright, CSR No. 9024

1 APPEARANCES:

2 For the Plaintiff:

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5 WHITEFIELD & MARSH LLP, BY: MR. WHITEFIELD

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7 For the Defendant:

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10 OKONKWO LEGAL GROUP, BY: MS. OKONKWO

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WITNESS JORDAN EVERY SAMPLE

EXAMINATION

BY MR. WHITEFIELD

PAGE

EXHIBITS

EXHIBIT	DESCRIPTION	PAGE
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Exhibit 1	Warehouse safety manual	6
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Exhibit 2	Loading dock schedule	12
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09:30:00AM EXAMINATION BY MR. WHITEFIELD

09:30:07AM 2 BY MR. WHITEFIELD:

09:30:14AM 3 A. At the distribution center in Midbrook.

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.

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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.

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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?
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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. Steenright, CSR No. 9031

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

ERRATA SHEET

Deposition of JORDAN AVERY SAMDIN

Page No. _____ Line No. _____ Change to: _____

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Signature: _____

ERRATA SHEET

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Signature: _____

A afterward (24) 5:14,17,22;6:3,9,22;7:3,8,24;8:13,14,19;9:16,19,24;10:5,21,24;11:2,5,10;12:7,10,15 although (23) 5:5,19,6:7,10,15;7:12,15,20;8:2,7,23;9:4,7,13,14;10:9,12,12;11:14,17,22;12:3,19,22 area (4) 7:3,9,23;10:4,12;14:3 arrived (4) 6:14;9:11;11:21;12:2	5:12;1:9,25 drivers (26) 5:4,20,23;6:1,9,25;7:6,9,14;8:1,20,25;9:1,6,22,25;10:3,6,11;11:8,11,16;12:13,16,21 during (4) 6:20;7:1;9:17;12:8 E employed (3) 7:11;10:3;12:18 entrance (5) 6:24;7:5;9:21;10:2;12:12 EXAMINATION (1) 5:1 Exhibit (4) 6:4,12;4:6	8:2,7,22;9:4,7,12;10:9,12,17;11:14,16;12:12,3,19,22 Millbrook (4) 5:8;7:13;10:10;12:20 moment (2) 6:6;12:6 Monday (5) 5:45;7:25;8:12;10:22;11:3 more (4) 5:21;6:2;8:18;10:9 morning (5) 6:2,7:5;9:21;10:2;12:12 N named (4) 5:9;7:19;8:6;10:16 needed (26) 5:4,20,23;6:1,9,25;7:6,9,14;8:1,20,25;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) 6:5,10;6:7,10,15;7:3,12,15,20;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;11:2,20,23;12:9,25	P pages (3) 6:12;9:9;11:19 paperwork (24) 5:14,17,22;6:3,19,22;7:3,8,24;8:11,14,19;9:16,19,24;10:5,21,24;11:2,5,10;12:7,10,15 Parker (4) 5:9;7:9;8:6;10:16 Please (2) 6:6;12:6 portions (4) 6:20;7:1;9:17;12:8 R read (4) 6:20;7:1;9:17;12:8 repairing (4) 7:7;9:23;10:4;12:14 repairs (4) 6:8;8:24;9:9;11:15 review (5) 5:13;7:23;8:20;10:20;11:1 Right (4) 6:19;9:11;11:21;12:3 S schedule (5) 5:13;7:23;8:10;10:20;11:1 scheduling (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 second (4) 6:12;9:11;11:21;12:2 show (9) 5:7,9;7:12;9:25;10:14,16;12:24 slow (4) 5:25;8:2,9,3;11:13 showed (4) 6:8;8:24;9:5;11:15 signature (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 sometimes (5) 7:21;6:2;8:18;11:9 spring (3) 7:13;10:8;12:18 supervised (5) 5:7;7:13;8:4;10:14;12:24 T truck (4) 6:1,9;11;11:21;12:3	twice (4) 5:21;6:2;8:18;11:9 two (4) 6:8;8:24;9:5;11:15; U usually (4) 5:21;6:2;8:18;11:9 V vague (33) 5:6,12,18,24;6:5,17,17,23;7:4,10,16,23;8:7,9,15,21;9:23;10:4,20;10:1,7,13,19,25;11:6,12,18,24;12:5,11,17,23 W week (8) 5:25;6:2;8:20;22;9:3;11:9,13 WHITEFIELD (2) 5:1,2 wrote (24) 6:8,11,16,16,13,16,21;7:2,18,21;8:5,8,13;9:10,13,18;10:10,18,23;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

Exhibit 1.pdf

Synthetic Exhibit 1

PREVIEW * 870e51f6d4dbcc84

EXHIBIT 2

Loading dock schedule

Marked for identification at page 12, line 4

Exhibit 2 self

Synthetic Exhibit 2

