

Request to Proceed with Arbitrator Appointment – Hollingsworth v. DRVM LLC et al. JAMS
Ref. No. 5160000821

Date: April 14th, 2025

To: [REDACTED] Thornton ([REDACTED]@jamsadr.com)

Cc: Nicole Demmon (ndemmon@grsm.com), Rachael Curtis (rcurtis@grsm.com)

Dear Ms. Thornton,

I am writing in response to the April 14, 2025 correspondence submitted by counsel for DRVM LLC.

While I understand the need for parties to confirm representation, the letter provides no substantive explanation as to why, after months of prior filings and active participation, counsel is now uncertain whether they will represent additional parties named in this arbitration. Notably, DRVM LLC is a dissolved entity that functioned as a shell within the broader business and benefits structure, and is not the core respondent that benefits from the conduct at issue. It is unclear how counsel can file on behalf of one entity while disclaiming whether they represent other core parties named in the agreement and subject to this proceeding.

This contradiction—paired with a vague request for additional time—strongly suggests a procedural stall tactic. Claimant has submitted a Fourth Amended Complaint supported by over 100 exhibits, and all respondents have been properly served in accordance with the binding Mutual Arbitration Agreement and JAMS rules.

At this stage, further delay risks prejudicing the Claimant and undermining the efficiency and neutrality that arbitration is meant to provide. Therefore, I respectfully request that JAMS proceed with arbitrator appointment without further delay. Any clarification regarding representation can be addressed post-appointment as the case progresses, as is common in multiparty proceedings.

Please let me know if I can provide any additional information or documentation to support this request.

Sincerely,

Jorden Hollingsworth
[REDACTED]