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June 27, 2025

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[REDACTED] Thornton
Arbitration Practice Administrator
JAMS

Copy to: Claimant Jorden Hollingsworth (by email and first-class mail)

[REDACTED]
[REDACTED]
[REDACTED]

Re: *Jorden Hollingsworth v. DRVM LLC, et al.*
JAMS Ref. No.: 5160000821

Dear Ms. Thornton,

As you know, this firm represents Respondent DRVM LLC, in the above-referenced matter. I write on behalf of Respondent to register our formal non-consent to the appointment of Dr. Ryan Abbott as arbitrator in this matter. While we acknowledge Dr. Abbott's distinguished background in artificial intelligence and his co-authorship of the JAMS AI Guidelines, his expertise is entirely untethered from the narrow issues presented here—namely, an uncomplicated Oregon wage dispute.

This case does not turn on matters of algorithmic design, AI ethics, or emerging technology. Instead, it requires a neutral arbitrator with practical knowledge of Oregon wage statutes, industry-standard payroll practices, and statutory penalty calculations. Accordingly, Dr. Abbott's qualifications, however impressive, bear no relevance to the factual and legal questions before us.

To ensure efficient resolution and to honor the parties' mutual interest in a prompt determination, Respondent respectfully requests that JAMS appoint an arbitrator whose background and experience align with state-law wage disputes. Respondent will submit its arbitrator preferences through JAMS' Rank and Strike process and remains ready to proceed without further delay once an appropriately qualified arbitrator has been selected.

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Thank you for your attention to this matter. Please let me know if you require any additional information or further briefing on our position.

Sincerely,

A handwritten signature in black ink, appearing to read 'Stephen M. Scott', written over a horizontal line.

Stephen M. Scott
Partner
For FISHER & PHILLIPS LLP

SMS:be