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UNITED STATES DEPARTMENT OF LABOR

OFFICE OF ADMINISTRATIVE LAW JUDGES

In the Matter of,

JORDEN HOLLINGSWORTH,

Complainant,

v.

DRVM LLC, et al.,

Respondents.

OALJ Case No.: 2025-TAX-00022

OSHA Case No.: 301059686

**RESPONDENT DRVM LLC'S
INITIAL DISCLOSURES**

TO: Complainant Jorden Hollingsworth, P.O. Box 16142, Portland, Oregon 97292.

Pursuant to 29 C.F.R. § 18.50(c)(1) and Administrative Law Judge Henley's Notice of Docketing issued on November 14, 2025 (the "Notice"), Respondent DRVM LLC ("Respondent") hereby submits the following Initial Disclosures, based on information currently and reasonably available to Respondent.

I. PRELIMINARY STATEMENT

In making these disclosures, Respondent does not purport to identify every individual, document, data compilation, or tangible thing possibly relevant to this case. Rather, these disclosures represent a good faith effort to identify discoverable information Respondent currently and reasonably believes may be used to support its claims and defenses. Respondent makes these disclosures based on limited knowledge for the facts, circumstances, and legal theories involved in the case at this time and in a good faith effort to comply with the requirements of 29 C.F.R. § 18.50(c)(1) and the Notice. Respondent acknowledges that further discovery, investigation, legal research, and analysis may supply additional facts and theories, which may lead to substantial changes in these disclosures. Respondent, accordingly, reserves the right to supplement any and all disclosures in accordance with 29 C.F.R. § 18.53. These disclosures do not include information that may be used solely for impeachment purposes.

II. INITIAL DISCLOSURES

A. Persons Likely to Have Discoverable Information Respondent May Use to Support Its Defenses.

Pursuant to 29 C.F.R. § 18.50(c)(1)(A), the following individuals are likely to have discoverable information that Respondent may use to support its defenses:

1. Complainant Jorden Hollingsworth (“Complainant” or “Mr. Hollinsworth”). Mr. Hollingsworth may have information regarding all issues in this appeal of OSHA’s dismissal of Mr. Hollingsworth’s belated OSHA complaint (the “Complaint”) as untimely, including the date of his termination from Respondent’s employ, the date he filed his OSHA Complaint, and other information relating to his claims and Respondent’s defenses in this appeal.

2. Ryan Himes, Assistant Regional Administrator, Occupational Safety and Health Administration (“OSHA”), 90 Seventh Street, Suite 2650, San Francisco, CA 94103. Mr. Himes may have information regarding OSHA’s dismissal of the Complaint as untimely, communications to Mr. Hollingsworth and Respondent regarding the Complaint, its dismissal, and other information relating to Mr. Hollingsworth’s claims and Respondent’s defenses in this appeal.

3. Steve Dickert, Chief Financial Officer for DRVM, LLC. Mr. Dickert may have information regarding the relevant issues in this appeal, including the date and the cause of Mr. Hollingsworth’s termination and DRVM LLC’s tax and payroll processes. Mr. Dickert may be contacted through Respondent’s Counsel of Record, Fisher & Phillips LLP.

4. Joe Psaradelis, Vice President of Demo Operations for DRVM. Mr. Psaradelis may have information regarding Mr. Hollingsworth’s for-cause termination. Mr. Psaradelis may be contacted through Respondent’s Counsel of Record, Fisher & Phillips LLP.

5. Any witness(es) necessary for impeachment or rebuttal.

6. Any witness(es) necessary to authenticate records or documents.

7. Respondent may also use any witness identified by Mr. Hollingsworth in his initial disclosures, witnesses identified by the parties during discovery, and any witnesses who testify at depositions or the hearing of this appeal.

8. Any custodians of any records of Mr. Hollingsworth and/or any other party.

9. Respondent reserves the right to supplement its initial disclosures to identify other individuals who are likely to have discoverable information, as appropriate.

While making these disclosures, Respondent reserves, among other rights, (1) its right to object on the grounds of competency, privilege, work product, relevancy and materiality, admissibility, hearsay, or any other proper ground to the use of any disclosed information, for any purpose, in whole or in part in this action or any other action; and (2) its right to object on any and all proper grounds, at any time, to any discovery request or motion relating to the subject matter of these disclosures.

In addition, these disclosures do not identify or otherwise include information regarding expert witnesses, as Fed. R. Civ. P. 26(a) does not require Respondent to provide such information at this time. These disclosures are made subject to the above objections and qualifications.

B. Documents, Electronically Stored Information, or Tangible Things in Respondent's Possession, Custody, or Control That It May Use to Support Its Defenses.

Pursuant to 29 C.F.R. § 18.50(c)(1)(B), the following categories of documents, electronically stored information ("ESI"), and/or tangible things are in the possession, custody, or control of Respondent, and may be used by Respondent to support its defenses:

1. Mr. Hollingsworth's August 13, 2025, Whistleblower Retaliation Complaint under the Taxpayer First Act.
2. OSHA's September 9, 2025, letter summarily dismissing the Complaint ("Secretary's Findings") due to Mr. Hollingsworth's failure to make a prima facie showing of retaliation.
3. Mr. Hollingsworth's September 12, 2025, Objections to the Secretary's Findings.
4. Mr. Hollingsworth's post-termination emails and correspondence with DRVM and its payroll company regarding his termination and the payment of his final wages.

5. Mr. Hollingsworth's wage statements and personnel file.
6. Filings, documents, and non-privileged, non-confidential communications relating to Mr. Hollingsworth's Arbitration Demand against his former employer, DRVM LLC.
7. Respondent's proof of payment of the disputed underlying penalty, which was the only cognizable claim raised by Mr. Hollingsworth in his numerous arbitration demands.
8. Videos, documents, and other media and data created and posted by Mr. Hollingsworth that relate to his claims.
9. Respondent reserves the right to identify and use additional documents as discovered and any documents produced by Mr. Hollingsworth.
10. Respondent further reserves the right to submit as an exhibit or rely on at any proceeding any document or tangible item identified by any other party in this action or obtained from any third party. Respondent reserves the right to amend and/or supplement this list of documents and tangible things and discovery as this investigation proceeds.

C. Respondent's Damages Calculation.

Respondent denies that Mr. Hollingsworth has suffered any damages as a result of the alleged wrongdoing. Respondent has no documents responsive to 29 C.F.R. § 18.50(c)(1)(i)(C). Further, Respondent has not filed any counterclaim for damages in this case. Therefore, no response is required. Respondent, however, reserves the right to seek any and all damages to which discovery in this case reveals it is entitled, and this statement is without waiver or prejudice to the same.

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III. RESERVATION

Respondent reserves the right to supplement, add to, and/or change these disclosures.

DATED this 5th day of December 2025.

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