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Attorneys for Plaintiff and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SONOMA

ARRON STANFIELD, as an individual
and on behalf of all others similarly
situated,

Plaintiffs,

vs.

THE F.A. BARTLETT TREE EXPERT
COMPANY, a Connecticut corporation;
and DOES 1 through 50, inclusive,

Defendants.

Case No.: SCV-265929

[Assigned for all purposes to the Honorable Patrick
Broderick, Dept. 16]

**DECLARATION OF WILLIAM L. MARDER
IN SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: TBD
Time: TBD
Dept.: 16

Complaint Filed: January 28, 2020
Trial Date: None Set

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I, William L. Marder, hereby declare and state as follows:

1. I am an attorney at law duly admitted to practice before all courts in the State of California and am a partner of the law firm of the Polaris Law Group, LLP, one of the attorneys of record for Plaintiff Arron Stanfield (“Plaintiff”), in the above-entitled action. I have personal knowledge of the matters set forth herein, and if called upon as a witness to testify thereto, I could and would competently do so.

2. Both Plaintiff's and Defendant's counsel have a great deal of experience in wage and hour class action litigation. Plaintiff's counsel has been approved as class counsel in a number of matters, has litigated numerous other class action cases, and are competent to represent the class.

3. Based on my review of all the information, and based on my experience in class action litigation, I believe this settlement to be fair, adequate, and reasonable. The Settlement was obtained for the benefit of the Class, as opposed to the individual Class Representative.

4. I graduated from UCLA Law School in 1993 and was admitted to the California Bar in 1994. Since that time, I have acquired substantial experience in employment litigation. I have represented both plaintiffs and defendants. I estimate that I have handled more than 300 employment cases, litigating cases in state and federal courts.

5. I have defended large institutional employers in employment cases. From 1995 to 1997, as an associate at Bolling, Walter & Gawthrop in Sacramento, I represented the City of Sacramento, Yolo County, the City of Davis, Solano County and other employers in employment litigation in state and federal courts.

6. From 1997 to 2000, I served as a Deputy County Counsel in San Benito, handling all of its employment matters. These matters include advising the county on compliance with wage and hour laws, arbitrations, and litigation.

7. From 2002 to 2006, I was a partner at Paxton O'Brien, LLP in Hollister, an AV rated firm, where I represented numerous plaintiffs and defendants in employment lawsuits.

8. In 2006, I co-founded the Polaris Law Group where I spend most of my time

1 handling employment cases. I primarily represent employees.

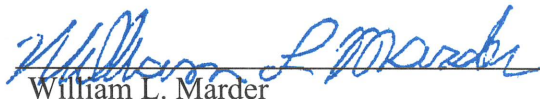
2 9. I have been the sole trial attorney in two jury trials in which I represented a
3 plaintiff who prevailed on wrongful termination claims brought pursuant to the California Fair
4 Employment & Housing Act, California Government § 12900 *et seq.* These cases are: *Gamayo*
5 *v. Drobny Law Offices*, Sacramento Superior Court Case No.: 34-2008-00005372CU; and
6 *Cherub Berlanga v. Willow Grove School District*, San Benito County Superior Case No.: CU-
7 09-00100.

8 10. I have been the sole trial attorney in two court trials in which I represented
9 plaintiffs who prevailed on wage and hour claims. These cases are: *Smith v. Joyce*, Monterey
10 County Superior Court Case No.: M74334; and *Nava v. Rodriguez*, San Benito County Superior
11 Court Case No.: CU-08-00022.

12 11. I have also been approved as class counsel in numerous cases including *Sison v.*
13 *Headway Technologies*, Case No. 1-13-CV-254591 and *Barrera v. Home Depot*, Northern
14 District of California Case No. C 12 5199 LHK.

15 I declare under penalty of perjury under the laws of the State of California that the
16 foregoing is true and correct.

17 Executed on this 30 day of October, 2020, at Hollister, California.

18
19 
20 William L. Marder