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Attorneys for Plaintiffs
SHAYNIA VERNON and BENJAMIN CASTANEDA-RIVERA

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO**

SHAYNIA VERNON, as an individual and on
behalf of all others similarly situated;
BENJAMIN CASTANEDA-RIVERA, as an
individual and on behalf of all others similarly
situated,

Plaintiffs,

vs.

MCLANE/SUNEAST, INC., a Texas
corporation; MCLANE FOODSERVICE,
INC., a Texas corporation; and DOES 1
through 50, inclusive,

Defendants.

Case No.: CIVSB2123367

[Assigned for all Purposes to Hon. David Cohn,
Dept. S-26]

**DECLARATION OF WILLIAM L. MARDER
IN SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS AND
REPRESENTATIVE ACTION
SETTLEMENT**

Date: December 23, 2022

Time: 10:00 a.m.

Dept.: S-26

Complaint Filed: August 12, 2021

FAC Filed: September 8, 2022

Trial Date: None Set

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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, one of the attorneys of record for Plaintiffs Shaynia Vernon and Benjamin Castaneda-Rivera (together, "Plaintiffs"), 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.

3. 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 200 employment cases, litigating cases in state and federal courts.

5. From 1997-2000, 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.

6. From 2002-2006, 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.

7. In 2006, I co-founded the Polaris Law Group where I spend most of my time handling employment cases. I primarily represent employees.

8. I have been approved as class counsel in numerous other wage/hour class actions that have been granted class certification and final approval, including but not limited to:

Markham v. Quik Stop Markets, Inc., Santa Clara Superior Court Case No. 19CV341582, *Della Maggiora v. Watsonville Community Hospital*, Santa Cruz Superior Court Case No. 18CV00191, *Holman v. American Sugar Refining, Inc.*, Contra Costa Superior Court Case No. MSC18-00415, *Hanna v. Equinix LLC*, Santa Clara Superior Court Case No. 18CV339365, *Pittman v. Martinez Steel Corporation*, San Bernardino Superior Court Case No. CIVDS1823132, *Sanchez v. ExamOne WorldWide, Inc.*, Santa Clara Super Court Case No. 17CV30832, *Siron v. Raypak, Inc.*, Ventura Superior Court Case No. 56-2019-005279959-CU-OE-VTA, *Prexxie Pascual and Arturo Fonseca v. Satellite Healthcare, Inc.*, Santa Clara County Superior Court Case No. 19CV345211, *Ramirez v. Walgreen*, N.D. Cal. Case No. 18-cv-03921-EJD, *Reilly v. Recreational Equipment, Inc.*, N.D. Cal. Case No. 3:18-cv-07385-LB (Dkt. No. 61), *Chavez v. Converse, Inc.*, N.D. Cal. Case No. 15-cv-03746-NC (Dkt. No. 219), *Hernandez v. Wells Fargo Bank*, Santa Clara Superior Court Case No. 16CV299319, and *Carrillo v. New Balance Athletics, Inc.*, Santa Clara Superior Court Case No. 19CV352469.

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

Executed on this 29th day of November 2022, at Hollister, California.

William L. Marder