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

MARIA SANCHEZ, as an individual and
on behalf of all others similarly situated,

Plaintiffs,

vs.

LODI MEMORIAL HOSPITAL
ASSOCIATION, INC., a California
corporation; ADVENTIST HEALTH
SYSTEM/WEST, a California corporation;
and DOES 1 through 50, inclusive,

Defendants.

Case No.: STK-CV-UOE-2019-09557

(Assigned to the Hon. Roger Ross, Dept. 11B)

**DECLARATION OF WILLIAM L. MARDER
IN SUPPORT OF PLAINTIFFS' MOTION TO
APPROVE SETTLEMENT AGREEMENT
PURSUANT TO THE PRIVATE ATTORNEYS
GENERAL ACT**

Date: November 3, November 4, November 5,
November 6, or November 10, 2020

Time: 9:00 a.m.

Dept.: 11B

Complaint Filed: July 24, 2019

FAC Filed: October 10, 2019

SAC Filed: August 28, 2020

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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, LLP, one of the attorneys of record for Plaintiffs Maria Sanchez, Eric Ridgeway, Michelle Bueno, Cindy Javier, Deborah Patterson, Monica Barajas, and Mary Gallegos (collectively, "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 have been approved as class counsel in numerous other wage/hour class actions that have been granted class certification and final approval.

5. I have defended large institutional employers in employment cases. From 1995-1997, 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.

7. 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.

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

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

Executed on this 2nd day of October 2020, at Hollister, California.

Wm. L. Mander

William L. Marder