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Attorneys for Plaintiff JOSE DE LA TORRE,
individually and on behalf of all others similarly situated

(ADDITIONAL COUNSEL ON NEXT PAGE)

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

JOSE DE LA TORRE, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

WASTE MANAGEMENT OF
CALIFORNIA, INC., a California
Corporation, WASTE MANAGEMENT,
INC., a Texas Corporation, and DOES 1-50,
inclusive,
Defendants.

Case No. 20STCV16032

ASSIGNED FOR ALL PURPOSES TO
JUDGE: ELIHU M. BERLE, DEPT. 6

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

Date: August 28, 2025

Time: 10:00 a.m.

Place: Dept. SSC-6

Complaint Filed: April 24, 2020

ADDITIONAL COUNSEL

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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 member of the law firm of the Polaris Law Group, LLP, one of the attorneys of record for Plaintiff LORI ARELLANO (“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. I along with my co-counsels have diligently litigated this case and will continue to do so.

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.

ATTORNEY QUALIFICATIONS

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

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.

6. 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. 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.

1 8. I have been approved as class counsel in numerous cases, either as a result of the
2 granting of class certification or as part of the class settlement approval process, including
3 without limitation, the following cases:

- 4 a. *Sison v. Headway Technologies*, Case No. 1-13-CV-254591;
5 b. *Barrera v. Home Depot*, Northern District of California Case No. C 12
6 5199 LHK;
7 c. *Chavez v. Converse, Inc.*, N.D. Cal. Case No. 15-cv-03746-NC;
8 d. *Lao v. H&M Hennes & Mauritz*, N.D. Cal. Case No. 5:16-cv-333 EJD;
9 e. *Magadia v. Wal-Mart Assocs.*, N.D. Cal. Case No. 5:17-cv-00062-LHK;
10 f. *Naranjo v. Bank of America, N.A.*, N.D. Cal. Case No. C 14-02748 LHK;
11 g. *Ortegon-Ramirez v. Cedar Fair*, Santa Clara Sup. Ct. Case No. 1-13-CV-
12 254098;
13 h. *Rodriguez v. NIKE Retail Services, Inc.*, N.D. Cal. Case No. 5:14-CV-
14 1508 BLF;
15 i. *Vass v. Gardner Trucking*, San Joaquin Sup. Ct. Case No. 39-2013-
16 294819-CU-OE-STK;
17 j. *Huertas v. Chevron Stations*, Santa Clara Sup. Ct. Case No. 17CV309996;
18 k. *Chavez v. Hugo Boss, Inc.*, Santa Clara Sup. Ct Case No. 18CV322644.

19 9. I was part of the trial team that prevailed on behalf of the certified class in
20 *Magadia v. Wal-Mart Assocs., Inc.*, 384 F. Supp. 3d 1058 (N.D. Cal. 2019), in which we
21 obtained a \$102 million judgment for the class, but was reversed by the Ninth Circuit. I also am
22 counsel in *Rodriguez v. Nike Retail Servs., Inc.*, 928 F.3d 810, 818 (9th Cir. 2019), in which we
23 prevailed on class certification and in reversing the district court's granting of summary
24 judgment for the employer.

25 10. To date, my firm has incurred approximately 36.7 hours on this case. I have
26 attached a summary of the time I have spent on this matter, as Exhibit A, which reflects a
27 breakdown of the hours and activities spent by my firm on this matter. My current billing rate is
28 at \$900.00 per hour. Since 2020, I have been approved at \$750 per hour. In 2020, U.S. District

1 Judge David Davila approved my hourly rate of \$750 in *Ramirez v. Walgreen*, N.D. Cal. Case
2 No. 18-cv-03921-EJD (Dkt. No. 34), as well as the Santa Clara County Superior Court in
3 *Hernandez v. Wells Fargo Bank*, Santa Clara Super. Ct. Case No. 16CV299319. In 2023, I
4 increased my rate to \$850, and on January 1, 2025, I raised my rate to \$900.

5 11. I also anticipate incurring an additional 10 hours to administer this settlement,
6 including ensuring payment and communicating with class members/aggrieved employees and
7 the administrator. As such, the total of my firm's attorney's fees is \$42,030.00 (46.7 hours ×
8 \$900 per hour).

9 I declare under penalty of perjury under the laws of the State of California that the
10 foregoing is true and correct. Executed on June 13, 2025, at Hollister, California.

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14 William L. Marder
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EXHIBIT “A”

Description of Task	Amount
Conduct client intake	2.5
Review client documents	3.2
Review and revise PAGA complaint	2.9
Review and revise Joint CMC Statement	2.4
Review and revise class complaint	3.4
Confer with client on settlement	1.5
Review and revise motion for preliminary	4.5
Draft declaration in support of preliminary	3.9
Review class administrator communications and reports	1.5
Review and revise motion for final	6.4
Draft declaration in support of final	4.5
	Total
	36.7