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Attorneys for Plaintiff and the Class

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

RICHARD TOBIN, as an individual
and on behalf of all others similarly
situated,

Plaintiff,

vs.

RYDER TRUCK RENTAL, INC., a
Florida corporation; and DOES 1
through 50, inclusive,

Defendants.

Case No.: 5:20-cv-01569-JGB-SHK

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

Date:

Time: 9:00 A.M.

Location: Courtroom 1
3470 Twelfth Street
Riverside, CA 92501

1 **DECLARATION OF WILLIAM L. MARDER**

2 I, William L. Marder, declare as follows:

3 1. I am an attorney at law duly admitted to practice before all courts in
4 the State of California and am a member of the law firm of the Polaris Law Group,
5 LLP, one of the attorneys of record for Plaintiff Richard Tobin ("Plaintiff"), in the
6 above entitled action. I have personal knowledge of the matters set forth herein,
7 and if called upon as a witness to testify thereto, I could and would competently do
8 so.

9 2. I along with my co-counsel have diligently litigated this case and will
10 continue to do so.

11 3. Based on my review of all the information, and based on my
12 experience in class action litigation, I believe this settlement to be fair, adequate
13 and reasonable.

14 **ATTORNEY QUALIFICATIONS**

15 4. I graduated from UCLA Law School in 1993 and was admitted to the
16 California Bar in 1994. Since that time, I have acquired substantial experience in
17 employment litigation. I have represented both plaintiffs and defendants. I estimate
18 that I have handled more than 200 employment cases, litigating cases in state and
19 federal courts.

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

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

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

1 employment lawsuits.

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

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

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

9 Executed on this 8 day of March, 2021, at San Jose, California.

10 
11 _____
12 William L. Marder