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Attorneys for Plaintiff and the Class

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

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

Plaintiffs,

vs.

CALIFORNIA RESOURCES
CORPORATION, a Delaware corporation;
and DOES 1 through 50, inclusive,

Defendants.

Case No.: 20STCV15170

[Assigned for all purposes to the Honorable
William F. Highberger, Department 10]

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

Date: September 21, 2021
Time: 10:00 a.m.
Dept.: 10

Complaint Filed: April 20, 2020
Trial Date: None Set

1 **DECLARATION OF WILLIAM L. MARDER**

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

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

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

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

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

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

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

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

28 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 v.*
5 *Drobny Law Offices*, Sacramento Superior Court Case No.: 34-2008-00005372CU; and *Cherub*
6 *Berlanga v. Willow Grove School District*, San Benito County Superior Case No.: CU-09-00100.

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

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

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

16 Executed on this 25 day of August 2021, at Hollister, California.

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18 William L. Marder
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