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Attorneys for Plaintiff James Sims,
the Class, and Aggrieved Employees

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

JAMES SIMS, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

QG PRINTING II LLC, a Connecticut
limited liability company; 74 QG
PRINTING II LLC, business
organization, form unknown; and
DOES 1 through 50, inclusive,

Defendants.

Case No. 5:20-cv-01632-DMG-DTBx

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

Date: April 19, 2024

Time: 10:00 A.M.

Courtroom: 8C

Judge: Hon. Dolly M. Gee

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I, William L. Marder, declare as follows:

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 Polaris Law Group, one of the attorneys of record for Plaintiff James Sims (“Plaintiff”), on behalf of himself and other similarly situated individuals, 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. After taking into account sharply disputed factual and legal issues involved in this litigation, the risks attending further prosecution, and the substantial benefits to be received pursuant to the compromise and settlement of the litigation, I have concluded that settlement on the terms hereinafter set forth is appropriate and in the best interests of the Parties and that this settlement is fair and reasonable. The lack of opt outs and objections support that the settlement is fair and reasonable.

3. I am one of the primary attorneys on this matter. My qualifications are as follows: 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 300 employment cases, litigating cases in state and federal courts.

4. I have defended large institutional employers in employment cases. From 1995 to 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.

5. From 1997 to 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 to 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

1 lawsuits.

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

4 8. I have been the sole trial attorney in two jury trials in which I represented a
5 plaintiff who prevailed on wrongful termination claims brought pursuant to the California
6 Fair Employment & Housing Act, California Government § 12900 *et seq.* These cases
7 are: *Gamayo v. Drobny Law Offices*, Sacramento Superior Court Case No.: 34-2008-
8 00005372CU; and *Cherub Berlanga v. Willow Grove School District*, San Benito County
9 Superior Case No.: CU-09-00100.

10 9. I have been the sole trial attorney in two court trials in which I represented
11 plaintiffs who prevailed on wage and hour claims. These cases are: *Smith v. Joyce*,
12 Monterey County Superior Court Case No.: M74334; and *Nava v. Rodriguez*, San Benito
13 County Superior Court Case No.: CU-08-010022.

14 10. I have also been approved as class counsel in numerous cases including
15 *Sison v. Headway Technologies*, Case No. 1:13-CV-254591; *Barrera v. Home Depot*,
16 Northern District of California Case No. C 12 5199 LHK; *Ramirez v. Walgreen*, N.D.
17 Cal. Case No. 18-cv-03921-EJD; *Reilly v. Recreational Equipment, Inc.*, N.D. Cal. Case
18 No. 3:18-cv-07385-LB; and *Chavez v. Converse, Inc.*, N.D. Cal. Case No. 15-cv-03746-
19 NC.

20 I declare under penalty of perjury and the laws of the United States of America and
21 the State of California that the foregoing is true and correct and that this declaration was
22 executed on this 5th day of April 2024, at Hollister, California.

23
24 /s/ William L. Marder
William L. Marder