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Attorneys for Plaintiff and the Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA**

MENCHILA VILLARUBIA WOODALL,
as an individual and on behalf of all others
similarly situated,

Plaintiffs,

vs.

VASONA MANAGEMENT, INC., an
California corporation; and DOES 1 through
50, inclusive,

Defendants.

Case No.: 20CV366143

(Assigned to the Honorable Patricia M. Lucas,
Dept. 3)

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

Date: June 16, 2021

Time: 1:30 p.m.

Dept.: 3

Complaint Filed: April 20, 2020

FAC Filed: July 16, 2020

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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 partner of the law firm of the Polaris Law Group, LLP, one of the attorneys of record for Plaintiff Menchila Villarubia Woodall (“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 support the settlement as fair, reasonable, and adequate, and in the best interest of the Plaintiff and the aggrieved employees as a whole.

3. I have been approved as class counsel in numerous other wage/hour class actions that have been granted class certification and final approval.

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.

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.

9. To date, my firm has incurred approximately 10.8 hours on this case. I have attached a summary of the time I have spent on this matter, as **Exhibit A**, which reflects a

breakdown of the hours and activities spent by my firm on this matter.

10. My current billing rate is at \$750.00 per hour. In the past year I have been approved at this rate in a number of cases, including but not limited to: *Markham v. Quik Stop Markets, Inc.*, Santa Clara Superior Court Case No.19CV341582, *Della Maggiora v. Watsonville Community Hospital*, Santa Cruz Superior Court Case No.18CV00191, *Holman v. American Sugar Refining, Inc.*, Contra Costa Superior Court Case No. MSC18-00415, *Hanna v. Equinix LLC*, Santa Clara Superior Court Case No. 18CV339365, *Pittman v. Martinez Steel Corporation*, San Bernardino Superior Court Case No. CIVDS1823132, *Sanchez v. ExamOne WorldWide, Inc.*, Santa Clara Super Court Case No. 17CV30832, *Siron v. Raypak, Inc.*, Ventura Superior Court Case No. 56-2019-005279959-CU-OE-VTA, and *Prexxie Pascual and Arturo Fonseca v. Satellite Healthcare, Inc.*, Santa Clara County Superior Court Case No. 19CV345211. As such, the total of my firm's attorneys' fees through final approval is expected to be \$8,100.

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

Executed on this 24 day of ^{May}~~March~~ 2021, at Hollister, California.


William L. Marder

EXHIBIT A

**Woodall v. Vasona Management
Time and Task Chart for William L. Marder**

<u>Hours</u>	<u>Description of Work</u>
3.9	Review documents provided by client. Do public records search for other lawsuits against employer. Telephone conferences with client re potential case.
1.5	Research and analysis re defendant's liability for Labor Code violations and likely penalties which could be obtained.
2.5	Review and analyze settlement agreement and supporting documents. Explain settlement to client and obtain client's signature.
2.9	Review, analyze and edit motion for settlement approval and supporting documents.

TOTAL: 10.8