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Attorneys for Plaintiff Charles Rodriguez, on behalf
of himself and all others similarly situated

Additional counsel listed on next page.

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

CHARLES RODRIGUEZ, an individual,
on behalf of himself and all others similarly
situated,

Plaintiff,

v.

U.S. BANK NATIONAL ASSOCIATION,
dba U.S. Bank; and DOES 1 through 100,
inclusive

Defendants.

Case No. BC617356

CLASS ACTION

Assigned to: Hon. Amy D. Hogue; Dept. 7

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

Date: March 9, 2022

Time: 9:30 a.m.

Dept.: 7

Action filed: April 15, 2016

Related Case: 19STCV17516

1 Larry W. Lee (State Bar No. 228175)
2 Kristen M. Agnew (State Bar No. 247656)
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4 **DIVERSITY LAW GROUP, P.C.**
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9 William L. Marder (State Bar No. 170131)
10 **Polaris Law Group LLP**
11 501 San Benito Street, Suite 200
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15 Attorneys for Plaintiff Ali Malik, Atefeh Yousefi,
16 and all others similarly situated.
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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
 nia and am a partner of the law firm of the Polaris Law Group, LLP, one of the attorneys of
 for Plaintiffs Ali Malik and Atefeh Yousefi (collectively, “Plaintiffs”), in the above entitled
 I have personal knowledge of the matters set forth herein, and if called upon as a witness to
 thereto, I could and would competently do so.

2. I have zealously represented the interests of the class throughout this litigation. The benefit was obtained for the benefit of the class, as opposed to the individual plaintiffs.

3. I have been approved as class counsel on a number of prior cases, have litigated numerous other class action cases, and am competent to represent the class. Based on my review of the information, and based on my experience in class action litigation, I believe this settlement to be adequate and reasonable.

4. I graduated from UCLA Law School in 1993 and was admitted to the California Bar. 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.

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

6. From 1997-2000, I served as a Deputy County Counsel in San Benito, handling all 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 here 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
g employment cases. I primarily represent employees.

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

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

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

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

Executed on November 29, 2021, at Hollister, California.

/s/ William L. Marder
WILLIAM L. MARDER

PROOF OF SERVICE

I am employed in the office of a member of the bar of this Court at whose direction this service was made. I am over the age of 18 and not a party to the within action; my business address is 9327 Fairway View Place, Ste. 100, Rancho Cucamonga, California 91730.

On November 29, 2021, I served the foregoing document described as **DECLARATION OF WILLIAM L. MARDER IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT AND PAGA SETTLEMENT** on the interested parties in this action as follows:

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SERVICE BY CASEANYWHERE

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DIVERSITY LAW GROUP, P.C.
515 S. Figueroa Street, Suite 1250
Los Angeles, CA 90071
Attorneys for Plaintiff Ali Malik and Atefeh Yousefi
SERVICE BY EMAIL

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PROOF OF SERVICE

1 I am “readily familiar” with the firm’s practice of services of process. Under that
2 practice, this document would be deposited:

3 **(VIA E-SERVICE)** I caused the document(s) to be served by CASEANYWHERE
4 by transmitting a true and correct copy to CASEANYWHERE to serve the parties listed
5 above; and

6 **(BY EMAIL)** I caused the document(s) to be sent to the person(s) at the electronic
7 address(es) listed above.

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

10 Executed on November 29, 2021 at Rancho Cucamonga, California.

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12 _____
13 Yvonne Medina
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