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

MARK WARD, as an individual and on
behalf of all others similarly situated,

Plaintiffs,

vs.

SEAGATE US LLC, a Delaware limited
liability company; and DOES 1 through
50, inclusive,

Defendants.

Case No.: 20CV368917

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

Date: May 6, 2021
Time: 1:30 P.M.
Dept.: 1

Complaint Filed: August 9, 2019
Trial Date: Not Set

**Electronically Filed
by Superior Court of CA,
County of Santa Clara,
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Case #20CV368917
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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, one of the attorneys of record for Plaintiff Mark Ward ("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.

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

5. Any remaining monies from uncashed settlement checks will be distributed to Child Advocates of Silicon Valley. Plaintiff does not have any relationship or connection with or to Child Advocates of Silicon Valley.

7. 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.

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

4 9. From 2002-2006, I was a partner at Paxton O'Brien, LLP in Hollister, an AV
5 rated firm, where I represented numerous plaintiffs and defendants in employment lawsuits.

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

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

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

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

21 14. My co-counsel and I will adequately represent the Class Members in this action.
22 Plaintiff's Counsel have and will zealously represent Plaintiff and the Class and pursue this
23 lawsuit to its conclusion. I have no conflicts with the Class and will adequately represent the
24 Class.

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

27 Executed on this 12th day of April, 2021, at Hollister, California.

William L. Marder

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