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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF MERCED

JASON ADAMS, RAUL ALVARADO, EMMA
SARWAR, SERGIO RODRIGUEZ, and
SHENITA TATUM, as private attorneys general
and as an individual and on behalf of all others
similarly situated,

Plaintiffs,

vs.

SCHOLLE IPN PACKAGING, INC., a Nevada
corporation; SCHOLLE PACKAGING, INC., a
Nevada corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No. 20CV-02350

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

Date: May 8, 2025
Time: 8:15 a.m.
Department: 8

Complaint Filed: August 17, 2020
FAC Filed: August 30, 2024

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1 I, William L. Marder, declare as follows:

2 1. I am an attorney admitted to practice in the State of California and am a partner of the
3 law firm of Polaris Law Group, one of the attorneys of record for Plaintiffs Jason Adams and Shenita
4 Tatum. I make this declaration on the basis of my own personal knowledge, except as to those matters
5 stated on information and belief and, as to those matters, I believe them to be true. If called as a witness,
6 I could testify competently as to the facts stated in this declaration.

7 2. From the inception of the case, Class Counsel has zealously represented the interests of
8 the Class. Based on my review of all the information, and based on my experience in class action
9 litigation, I believe this settlement to be fair, adequate, and reasonable. Although I believe that a class
10 can be certified, I also believe in the fairness of the settlement, based on the uncertainty and risks to
11 Plaintiffs and the Class from not prevailing on one or more of the causes of action or theories alleged in
12 the operative Complaint, the possibility of non-certification, and potential for appeals. This settlement
13 was obtained for the benefit of the Class, as opposed to the individual Class Representatives.

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

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

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

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

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

8. 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 two 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.

9. 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.

10. I have also been approved as class counsel in numerous cases including *Sison v. Headway Technologies*, Santa Clara Superior Court 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 this 11th day of April 2025, at Hollister, California.

William L. Ward

William L. Marder