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Attorneys for Plaintiff, the Class, and Aggrieved Employees

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN JOAQUIN

MARTIN MORENO, as an individual and
on behalf of all others similarly situated,

Plaintiffs,

vs.

MEDLINE INDUSTRIES, L.P., an Illinois
corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No.: STK-CV-UOE-2020-7446

(Assigned to the Hon. Erin Guy Castillo, Dept.
10B)

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

Date: May 11, 2022, May 12, 2022, or
May 13, 2022

Time: 9:00 a.m.

Dept.: 10B

Complaint Filed: September 8, 2020

FAC Filed: January 14, 2022

Trial: Not Set

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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 Martin Moreno (“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 competently do so.

3. Although Plaintiff believes that a class can be certified, Plaintiff also believes in the fairness of the settlement that is based on factoring in the uncertainty and risks to Plaintiff involved in not prevailing on one or more of the theories alleged in the operative First Amended Complaint, the possibility of non-certification, and the potential for appeals.

5. 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.

7. 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 lawsuits.

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1 handling employment cases. I primarily represent employees.

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

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

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

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

16 Executed on this 11 day of April 2022, at Hollister, California.

17 

18 _____
William L. Marder