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Attorneys for Plaintiff, the Class, and Aggrieved Employees

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO**

JOSE CABALO, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

JONES LANG LASALLE AMERICAS,
INC., a Maryland corporation; and DOES
1 through 50, inclusive,

Defendants.

Case No.: 37-2020-00044322-CU-OE-CTL

(Assigned to the Hon. Ronald F. Frazier, Dept. C-65)

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

Date: March 17, 2023

Time: 8:30 a.m.

Dept.: C-65

Complaint Filed: December 3, 2020

1 **DECLARATION OF WILLIAM L. MARDER**

2 I, William L. Marder, hereby declare and state as follows:

3 1. I am an attorney at law duly admitted to practice before all courts in the State of
4 California and am a partner of the law firm of the Polaris Law Group, one of the attorneys of
5 record for Plaintiff Jose Cabalo ("Plaintiff"), in the above-entitled action. I have personal
6 knowledge of the matters set forth herein, and if called upon as a witness to testify thereto, I
7 could and would competently do so.

8 2. Based on Class Counsel's independent investigations and evaluations, I am of the
9 opinion that the proposed settlement is fair, reasonable, and adequate, and is in the best interests
10 of the Class Members, in light of all known facts and circumstances, and the expenses and risks
11 inherent in litigation. The settlement was negotiated at arm's length and was facilitated by an
12 experienced and neutral mediator. Thus, this settlement should be granted final approval.

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

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

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

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

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

28 I declare under penalty of perjury under the laws of the State of California that the

1 foregoing is true and correct.

2 Executed on this 22 day of February 2023, at Hollister, California.

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4 William L. Marder
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