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Attorneys for Plaintiff, the Class, and Aggrieved Employees

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**FOR THE COUNTY OF KERN**

LEOPOLDO ORDAZ, as an individual and  
on behalf of all others similarly situated,

Plaintiffs,

vs.

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

Defendants.

Case No.: BCV-20-102983

[Assigned for all purposes to the Hon. Thomas S.  
Clark, Department 17]

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

Date: August 5, 2022

Time: 8:30 A.M.

Dept.: 17

1                                    **DECLARATION OF WILLIAM L. MARDER**

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

3            1.        I am an attorney at law, duly licensed to practice before all Courts in the State of  
4 California, and am with the law firm Polaris Law Group, counsel of record for Named Plaintiff  
5 Leopoldo Ordaz ("Plaintiff"). I have personal knowledge of the facts set forth below and if  
6 called to testify I could and would do so competently.

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

12           3.        Any remaining monies from uncashed settlement checks will be distributed to the  
13 *cy pres* recipient, Legal Aid at Work, in accordance with C.C.P. § 384. I do not have any  
14 relationship with or connection to said organization.

15           4.        My qualifications are as follows: I graduated from UCLA Law School in 1993  
16 and was admitted to the California Bar in 1994. Since that time, I have acquired substantial  
17 experience in employment litigation. I have represented both plaintiffs and defendants. I estimate  
18 that I have handled more than 200 employment cases, litigating cases in state and federal courts.

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

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

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

28           8.        In 2006, I co-founded the Polaris Law Group where I spend most of my time

1 handling employment cases. I primarily represent employees.

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

4 Executed on July 8, 2022 at Hollister, California.

5  
6   
7 William L. Marder