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Attorneys for Plaintiff, the Class, and Aggrieved Employees

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

JEANETTE OSMAN-BRAVARD, as an
individual and on behalf of all others similarly
situated,

Plaintiff,

vs.

PLACER TITLE COMPANY, a California
corporation; and DOES 1 through 50, inclusive,

Defendants.

Case No. CU21-085315

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

Date: October 21, 2022
Time: 10:00 a.m.
Dept.: 6

Complaint Filed: March 19, 2021
FAC Filed: March 26, 2021

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 Jeanette
5 Osman-Bravard ("Plaintiff"). I have personal knowledge of the facts set forth below and if called to
6 testify I could and would do so competently.

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

9 3. I do not have any relationship with or connection to the proposed *cy pres* beneficiary:
10 Loaves and Fishes.

11 4. I graduated from UCLA Law School in 1993 and was admitted to the California Bar in
12 1994. Since that time, I have acquired substantial experience in employment litigation. I have
13 represented both plaintiffs and defendants. I estimate that I have handled more than 200 employment
14 cases, litigating cases in state and federal courts.

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

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

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

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

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

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

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

Executed on this 19 day of September 2022, at Hollister, California.

William L. Marder
William L. Marder