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Attorneys for Plaintiff and the Class

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

RAKESH RAY, as an individual and on
behalf of all others similarly situated,

Plaintiffs,

vs.

C&W FACILITY SERVICES, INC.,
Massachusetts corporation; and DOES 1
through 50, inclusive,

Defendants.

Case No.: CIVSB2101321

[Assigned for all purposes to the Hon. David Cohn,
Department S-26]

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

Date: April 5, 2022

Time: 10:00 A.M.

Dept.: S-26

Complaint Filed: January 28, 2021

FAC Filed: April 22, 2021

SAC Filed: October 1, 2021

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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, LLP, one of the attorneys of record for Plaintiff Rakesh Ray (“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 and would competently do so.

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

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

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

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1 a summary of the time I have spent on this matter, as **Exhibit A**, which reflects a breakdown of the
2 hours and activities spent by my firm on this matter.

3 9. My current billing rate since 2018 has been \$750.00 per hour. I was previously
4 approved at this rate in numerous cases, including: *Markham v. Quik Stop Markets, Inc.*, Santa
5 Clara Superior Court Case No.19CV341582, *Della Maggiora v. Watsonville Community Hospital*,
6 Santa Cruz Superior Court Case No.18CV00191, *Holman v. American Sugar Refining, Inc.*, Contra
7 Costa Superior Court Case No. MSC18-00415, *Hanna v. Equinix LLC*, Santa Clara Superior Court
8 Case No. 18CV339365, *Pittman v. Martinez Steel Corporation*, San Bernardino Superior Court
9 Case No. CIVDS1823132, *Sanchez v. ExamOne WorldWide, Inc.*, Santa Clara Super Court Case
10 No. 17CV30832, and *Siron v. Raypak, Inc.*, Ventura Superior Court Case No. 56-2019-005279959-
11 CU-OE-VTA. As such, the total of my firm's attorneys' fees through final approval is expected to
12 be \$3,225.

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

15 Executed on this 10 day of March, 2022, at Hollister, California.

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17 William L. Marder
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EXHIBIT A

Ray v. C&W Facility Services, Inc.
William L. Marder Time and Task Chart

Hours	Description of Work
5.7	Meet with client and review relevant documents.
.9	Review Complaint.
1.8	Review and edit Settlement Stipulation and class notice.
8.4	TOTAL HOURS