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Attorneys for Plaintiff and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF RIVERSIDE

IKEYEE JACKSON, as an individual and
on behalf of all others similarly situated,

Plaintiffs,

vs.

SAMUEL, SON & CO. (USA) INC., a
Delaware corporation; and DOES 1
through 50, inclusive,

Defendants.

Case No.: CVRI2101679

(Assigned to the Honorable Harold Hopp, Dept.
10)

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

Date: June 5, 2023

Time: 8:30 a.m.

Dept.: 10

Complaint Filed: March 30, 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, one of the attorneys of record for Plaintiff Ikeyee Jackson (“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.

8. To date, my firm has incurred approximately 17.7 hours on this case. I have attached a summary of the time I have spent on this matter, as **Exhibit A**, which reflects a breakdown of the hours and activities spent by my firm on this matter.

9. My current billing rate since 2018 has been \$750.00 per hour. I was previously approved at this rate in numerous cases, including: *Markham v. Quik Stop Markets, Inc.*, Santa Clara Superior Court Case No.19CV341582, *Della Maggiora v. Watsonville Community Hospital*, Santa Cruz Superior Court Case No.18CV00191, *Holman v. American Sugar Refining, Inc.*, Contra Costa Superior Court Case No. MSC18-00415, *Hanna v. Equinix LLC*, Santa Clara Superior Court Case No. 18CV339365, *Pittman v. Martinez Steel Corporation*, San Bernardino Superior Court Case No. CIVDS1823132, *Sanchez v. ExamOne WorldWide, Inc.*, Santa Clara Super Court Case No. 17CV30832, and *Siron v. Raypak, Inc.*, Ventura Superior Court Case No. 56-2019-005279959-CU-OE-VTA. As such, the total of my firm's attorneys' fees through final approval is expected to be \$13,275.

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

Executed on May 9, 2023, at Hollister, California.


William L. Marder

EXHIBIT A

JACKSON V. SAMUEL, SON & CO. (USA) INC.
Time and Task Chart for William Marder

Hours	Description of Work
4.1	Initial meeting with client.
5.8	Factual investigation and review of case documents.
7.8	Additional communications with client regarding case status, review of filed documents, and declarations.
Total: 17.7	