

Larry W. Lee (State Bar No. 228175)
Kristen M. Agnew (State Bar No. 247656)
Nicholas Rosenthal (State Bar No. 268297)
DIVERSITY LAW GROUP, P.C.
515 S. Figueroa Street, Suite 1250
Los Angeles, CA 90071
(213) 488-6555
(213) 488-6554 facsimile

William L. Marder (State Bar No. 170131)
Polaris Law Group
501 San Benito Street, Suite 200
Hollister, CA 95023
(831) 531-4214
(831) 634-0333 facsimile

Attorneys for Plaintiff, the Class, and Aggrieved Employees

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

MELISSA MOSS, as an individual and on
behalf of all others similarly situated,

Plaintiffs,

vs.

SARES REGIS OPERATING COMPANY,
L.P.; and DOES 1 through 50, inclusive,

Defendants.

Case No.: 30-2021-01201041-CU-OE-CXC

[Assigned for all purposes to the Hon. William
Claster, Dept. CX104]

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

Date: May 5, 2023

Time: 9:00 a.m.

Dept.: CX104

Complaint Filed: May 17, 2021

FAC Filed: August 16, 2021

SAC Filed: June 21, 2022

Trial Date: None Set

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 Melissa Moss ("Plaintiff"). I have personal knowledge of the facts set forth below and if called
6 to testify I could and would do so competently.

7 2. I am one of the primary attorneys on this matter. After taking into account sharply
8 disputed factual and legal issues involved in this litigation, the risks attending further
9 prosecution, and the substantial benefits to be received pursuant to the compromise and
10 settlement of the litigation, I believe that the settlement on the terms set forth in the Joint
11 Stipulation of Class Action and PAGA Settlement and Release of Claims is fair and reasonable,
12 and in the best interests of the Class.

13 3. I graduated from UCLA Law School in 1993 and was admitted to the California
14 Bar in 1994. Since that time, I have acquired substantial experience in employment litigation. I
15 have represented both plaintiffs and defendants. I estimate that I have handled more than 200
16 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 8. I have been approved as class counsel in numerous cases, either as a result of the

1 granting of class certification or as part of the class settlement approval process, including
2 without limitation, the following cases:

- 3 a. *Sison v. Headway Technologies*, Case No. 1-13-CV-254591;
4 b. *Barrera v. Home Depot*, Northern District of California Case No. C 12 5199
5 LHK;
6 c. *Chavez v. Converse, Inc.*, N.D. Cal. Case No. 15-cv-03746-NC;
7 d. *Lao v. H&M Hennes & Mauritz*, N.D. Cal. Case No. 5:16-cv-333 EJD;
8 e. *Magadia v. Wal-Mart Assocs.*, N.D. Cal. Case No. 5:17-cv-00062-LHK;
9 f. *Naranjo v. Bank of America, N.A.*, N.D. Cal. Case No. C 14-02748 LHK;
10 g. *Ortegon-Ramirez v. Cedar Fair*, Santa Clara Sup. Ct. Case No. 1-13-CV-254098;
11 h. *Rodriguez v. NIKE Retail Services, Inc.*, N.D. Cal. Case No. 5:14-CV-1508 BLF;
12 i. *Vass v. Gardner Trucking*, San Joaquin Sup. Ct. Case No. 39-2013-294819-
13 CUOE-STK;
14 j. *Huertas v. Chevron Stations*, Santa Clara Sup. Ct. Case No. 17CV309996; and
15 k. *Chavez v. Hugo Boss, Inc.*, *Santa Clara Sup. Ct Case No. 18CV322644*.

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

18 Executed on this 13th day of April 2023, at Hollister, California.

19 
20
21 William L. Marder