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Attorneys for Plaintiff, the Class, and Aggrieved Employees

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

SHARON MORRIS, as an individual and
on behalf of all others similarly situated,

Plaintiff,

vs.

COMMUNITY HOSPITAL OF THE
MONTEREY PENINSULA, a California
nonprofit corporation; and DOES 1
through 50, inclusive,

Defendants.

Case No.: 21CV001953

(Assigned to the Honorable Thomas W. Wills,
Dept. 15)

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

Date: September 9, 2022

Time: 8:30 a.m.

Dept.: 15

Complaint Filed: June 16, 2021

FAC Filed: August 6, 2021

SAC Filed: January 24, 2022

Trial Date: None Set

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

3. Any remaining monies from uncashed settlement checks will be distributed to the *cy pres* recipient Watsonville Law Center, a non-profit organization that provides free legal services to low-income individuals, in accordance with C.C.P. § 384. I do not have any relationship with or connection to said organization.

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

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

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

3 9. To date, my firm has incurred approximately 85.2 hours on this case. I have
4 attached a summary of the time I have spent on this matter, as **Exhibit A**, which reflects a
5 breakdown of the hours and activities spent by my firm on this matter.

6 10. I also anticipate spending an additional 10 hours conferring and reviewing e-mails
7 and other written communications with counsel for Defendant, the Settlement Administrator, and
8 Class Members regarding post final approval matters, including payments and related issues.

9 11. My current billing rate is at \$750.00 per hour. I have been approved at this rate in
10 a number of cases, including but not limited to: *Markham v. Quik Stop Markets, Inc.*, Santa Clara
11 Superior Court Case No.19CV341582, *Della Maggiora v. Watsonville Community Hospital*,
12 Santa Cruz Superior Court Case No. 18CV00191, *Holman v. American Sugar Refining, Inc.*,
13 Contra Costa Superior Court Case No. MSC18-00415, *Hanna v. Equinix LLC*, Santa Clara
14 Superior Court Case No. 18CV339365, *Pittman v. Martinez Steel Corporation*, San Bernardino
15 Superior Court Case No. CIVDS1823132, *Sanchez v. ExamOne WorldWide, Inc.*, Santa Clara
16 Super Court Case No. 17CV30832, *Siron v. Raypak, Inc.*, Ventura Superior Court Case No. 56-
17 2019-005279959-CU-OE-VTA, *Prexxie Pascual and Arturo Fonseca v. Satellite Healthcare*,
18 *Inc.*, Santa Clara County Superior Court Case No. 19CV345211, *Ramirez v. Walgreen*, N.D. Cal.
19 Case No. 18-cv-03921-EJD, *Reilly v. Recreational Equipment, Inc.*, N.D. Cal. Case No. 3:18-cv-
20 07385-LB (Dkt. No. 61), *Chavez v. Converse, Inc.*, N.D. Cal. Case No. 15-cv-03746-NC (Dkt.
21 No. 219), *Hernandez v. Wells Fargo Bank*, Santa Clara Superior Court Case No. 16CV299319,
22 and *Carrillo v. New Balance Athletics, Inc.*, Santa Clara Superior Court Case No. 19CV352469.
23 As such, the total of my firm's attorneys' fees through final approval is expected to be
24 \$71,400.00.

25
26 I declare under penalty of perjury under the laws of the State of California that the
27 foregoing is true and correct.
28

Executed on August 10, 2022, at Hollister, California.



William L. Marder

EXHIBIT A

Morris v. CHOMP
Time and Task Chart For William L. Marder

<u>Hours</u>	<u>Description of Work</u>
2.0	Speak to client. Review documents provided by client. Explain lawsuit process.
3.5	Research and analysis re defendant's liability for Labor Code violations and likely penalties which could be obtained.
1.8	Analysis re suitability of case to be brought as a class action.
1.4	Prepare analysis re likely cost investment to fund the case as a class action.
0.5	Review and revise PAGA letter.
5.5	Review and revise Complaint, First Amended Complaint and Second Amended Complaint.
8.0	Analysis re discovery which must be done to prove liability.
36.0	Review payroll records and calculate damages.
8.0	Review documents obtained in the case to value case; analysis re risk of summary judgment; and likelihood of class certification.
6.0	Review and revise mediation brief.
3.0	Multiple conversations with client to explain terms of settlement agreement. Obtain the client's signature on the settlement agreement.
5.5	Revise and revise motion for preliminary approval of settlement.
4.0	Review and revise motion for final approval.

TOTAL: 85.2