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Attorneys for Plaintiff

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

CHRIS ALVARADO, as an individual and  
on behalf of all others similarly situated, and  
as a private attorney general,

Plaintiff,

vs.

MISSION BAY MANAGEMENT, LLC, a  
Delaware limited liability company; and  
DOES 1 through 50, inclusive,

Defendants.

Case No.: 37-2021-00035853-CU-OE-CTL

[Assigned for all purposes to the Honorable  
Eddie C. Sturgeon, Dept. C-67]

**DECLARATION OF WILLIAM L.  
MARDER IN SUPPORT OF PLAINTIFF'S  
UNOPPOSED EX PARTE APPLICATION  
RE: PRIVATE ATTORNEYS GENERAL ACT  
SETTLEMENT APPROVAL**

Date: September 21, 2021

Time: 8:30 a.m.

Dept.: C-67

Complaint Filed: August 20, 2021

**ELECTRONICALLY FILED**  
Superior Court of California,  
County of San Diego

**09/17/2021** at 09:28:00 AM  
Clerk of the Superior Court  
By Kristin Sorianosos, Deputy Clerk

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I, William L. Marder, declare as follows:

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

2. Based on my own independent investigation and evaluation, I am of opinion that settlement for the consideration and on the terms set forth in the PAGA Settlement Agreement are fair, reasonable, and adequate and is in the best interests of the aggrieved employees in light of all known facts and circumstances and the expenses and risks inherent in litigation.

3. I strongly believe that Plaintiff can prevail at trial. However, I also believe in the fairness of the settlement, which is based on factoring in the uncertainty and risk to Plaintiff involved in not prevailing on one or more of the causes of action or theories alleged in their Complaint and in the possibility of appeals.

4. I was retained based upon a contingency fee arrangement wherein Plaintiff's counsel agreed to advance all costs and receive no fee unless a recovery was accomplished. Specifically, had Plaintiff failed to prevail in this case, counsel for Plaintiff would have spent a significant amount of time, money and other resources without any benefit or return. In addition, had Plaintiff also failed to prevail in the present case, Defendants would have been able to seek costs in connection with their defense of the case.

5. 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 300 employment cases, litigating cases in state and federal courts.

6. 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 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.

8. 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.

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

10. I have been the sole trial attorney in two court trials in which I represented plaintiffs who prevailed on wage and hour claims. These cases are *Smith v. Joyce*, Monterey County Superior Court Case No. M74334, and *Nava v. Rodriguez*, San Benito County Superior Court Case No. CU-08-00022.

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

12. I understand that the attorneys' fees awarded in this action will be split 65% to Diversity Law Group, P.C. and 35% to Polaris Law Group.

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

Executed on this September 7, 2021, at Hollister, California.

William L. Marsh

William L. Marder