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Attorneys for Plaintiff and Aggrieved Employees

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

LORELEI CHAMBERS, as an individual
and on behalf of all others similarly
situated,

Plaintiff,

vs.

SOMACIS INC., a California
corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No.: 37-2021-00033445-CU-OE-CTL

(Assigned to Hon. Eddie C. Sturgeon, Dept. C-67)

**DECLARATION OF WILLIAM L. MARDER
IN SUPPORT OF PLAINTIFF'S MOTION TO
APPROVE SETTLEMENT AGREEMENT
PURSUANT TO THE PRIVATE ATTORNEYS
GENERAL ACT**

Date: November 18, 2022

Time: 9:00 a.m.

Dept.: C-67

Complaint Filed: August 5, 2021

Trial Date: None Set

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I, William L. Marder, declare as follows:

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 Lorelei Chambers (“Plaintiff”). I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. I support the settlement as fair, reasonable, and adequate, and in the best interest of the Plaintiff and PAGA Settlement Members as a whole.

3. 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.

4. 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.

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.

6. 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.

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 9.8 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 have been

1 approved at this rate in a number of cases, including but not limited to: *Markham v. Quik Stop*
2 *Markets, Inc.*, Santa Clara Superior Court Case No.19CV341582, *Della Maggiora v. Watsonville*
3 *Community Hospital*, Santa Cruz Superior Court Case No. 18CV00191, *Holman v. American*
4 *Sugar Refining, Inc.*, Contra Costa Superior Court Case No. MSC18-00415, *Hanna v. Equinix*
5 *LLC*, Santa Clara Superior Court Case No. 18CV339365, *Pittman v. Martinez Steel Corporation*,
6 San Bernardino Superior Court Case No. CIVDS1823132, *Sanchez v. ExamOne WorldWide,*
7 *Inc.*, Santa Clara Super Court Case No. 17CV30832, *Siron v. Raypak, Inc.*, Ventura Superior
8 Court Case No. 56-2019-005279959-CU-OE-VTA, *Prexxie Pascual and Arturo Fonseca v.*
9 *Satellite Healthcare, Inc.*, Santa Clara County Superior Court Case No. 19CV345211, *Ramirez v.*
10 *Walgreen*, N.D. Cal. Case No. 18-cv-03921-EJD, *Reilly v. Recreational Equipment, Inc.*, N.D.
11 Cal. Case No. 3:18-cv-07385-LB (Dkt. No. 61), *Chavez v. Converse, Inc.*, N.D. Cal. Case No.
12 15-cv-03746-NC (Dkt. No. 219), *Hernandez v. Wells Fargo Bank*, Santa Clara Superior Court
13 Case No. 16CV299319, and *Carrillo v. New Balance Athletics, Inc.*, Santa Clara Superior Court
14 Case No. 19CV352469.

15
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 16 day of May 2022, at Los Angeles, California.

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20 William L. Marder
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EXHIBIT A

Chambers v. Somacis Inc.
Time and Task Chart for William Marder

Hours	Description of Work
5.7	Meet with client.
.4	Review and edit settlement agreement.
.5	Review and edit approval motion.
3.2	Communications with client regarding settlement.
9.8	TOTAL HOURS