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Attorneys for Plaintiff and the Class

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

PERLA MARIN, individually and on behalf of
all others similarly situated,

Plaintiff,

vs.

HB LEISURE, INC., a Florida corporation; and
DOES 1 through 50, inclusive,

Defendants.

Case No.: 37-2021-00048225-CU-OE-CTL

(Assigned to the Honorable Eddie C. Sturgeon,
Department 67)

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

Date: February 16, 2024

Time: 9:00 a.m.

Dept.: 67

1 **DECLARATION OF WILLIAM L. MARDER**

2 I, William L. Marder, hereby declare and state as follows:

3 1. I am an attorney at law duly admitted to practice before all courts in the State of
4 California and am a partner of the law firm of the Polaris Law Group, one of the attorneys of
5 record for Plaintiff Perla Marin ("Plaintiff"), in the above-entitled action. I have personal
6 knowledge of the matters set forth herein, and if called upon as a witness to testify thereto, I
7 could and would competently do so.

8 2. Based on Class Counsel's independent investigation and evaluation, I am of the
9 opinion that the proposed settlement is fair, reasonable, and adequate, and is in the best
10 interests of the Class Members, in light of all known facts and circumstances, and the expenses
11 and risks inherent in litigation. The settlement was negotiated at arm's length. Thus, this
12 settlement should be granted final approval.

13 3. My qualifications are as follows: I graduated from UCLA Law School in 1993
14 and was admitted to the California Bar in 1994. Since that time, I have acquired substantial
15 experience in employment litigation. I have represented both plaintiffs and defendants. I
16 estimate that I have handled more than 300 employment cases, litigating cases in state and
17 federal courts.

18 4. I have defended large institutional employers in employment cases. From 1995-
19 1997, as an associate at Bolling, Walter & Gawthrop in Sacramento, I represented the City of
20 Sacramento, Yolo County, the City of Davis, Solano County and other employers in
21 employment litigation in state and federal courts.

22 5. From 1997-2000, I served as a Deputy County Counsel in San Benito, handling
23 all of its employment matters. These matters include advising the county on compliance with
24 wage and hour laws, arbitrations, and litigation.

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

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

8. I have been the sole trial attorney in two jury trials in which I represented a plaintiff who prevailed on wrongful termination claims brought pursuant to the California Fair Employment & Housing Act, California Government § 12900 *et seq.* These three cases are: *Gamayo v. Drobny Law Offices*, Sacramento Superior Court Case No.: 34-2008-00005372CU; and *Cherub Berlanga v. Willow Grove School District*, San Benito County Superior Case No.: CU-09-00100.

9. 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.

10. 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.

11. Twenty-five percent (25%) of any remaining monies from uncashed settlement checks will be distributed to the State Treasury for deposit in the Trial Court Improvement and Modernization Fund. The remaining seventy-five percent (75%) will be distributed to Free to Thrive, in accordance with California Code of Civil Procedure § 384. I do not have any relationship with or connection to said organizations/programs.

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

Executed on this 23rd day of January 2024, at Hollister, California.

William L. Marder
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