

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 St., Suite 1250
Los Angeles, California 90071
(213) 488-6555
(213) 488-6554 facsimile
lwlee@diversitylaw.com
kagnew@diversitylaw.com
nrosenthal@diversitylaw.com

William L. Marder (SBN 170131)
bill@polarislawgroup.com
POLARIS LAW GROUP
501 San Benito Street, Suite 200
Hollister, CA 95023
Telephone: (831) 531-4214
Facsimile: (831) 634-0333

Attorneys for Plaintiff and the Class

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

EVERETT ALEXANDER, individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

KBR TECHNICAL SERVICES, INC., a Delaware
corporation; and DOES 1 through 50, inclusive,

Defendants.

Case No. CIVSB2133085

[Assigned for all purposes to the Hon. David
Cohn, Dept. S-26]

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

Date: September 21, 2023

Time: 9:00 a.m.

Dept.: S-26

Complaint Filed: November 9, 2021

FAC Filed: November 29, 2022

Trial Date: Not Set

DECLARATION OF WILLIAM L. MARDER

I, William L. Marder, hereby declare and state 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 Everett Alexander ("Plaintiff"), in the above-entitled action. I have personal knowledge of the matters set forth herein, and if called upon as a witness to testify thereto, I could and would competently do so.

2. Based on Class Counsel's independent investigations and evaluations, I am of the opinion that the proposed settlement is fair, reasonable, and adequate, and is in the best interests of the Class Members, in light of all known facts and circumstances, and the expenses and risks inherent in litigation. The settlement was negotiated at arm's length and was facilitated by an experienced and neutral mediator. Thus, this settlement should be granted final approval.

3. My qualifications are as follows: 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 52.6 hours on this case. I have attached a

1 summary of the time I have spent on this matter, as **Exhibit A**, which reflects a breakdown of the
2 hours and activities spent by my firm on this matter.

3 9. My current billing rate since 2018 has been \$750.00 per hour. I was previously
4 approved at this rate in numerous cases, including: *Markham v. Quik Stop Markets, Inc.*, Santa Clara
5 Superior Court Case No. 19CV341582, *Della Maggiora v. Watsonville Community Hospital*, Santa
6 Cruz Superior Court Case No. 18CV00191, *Holman v. American Sugar Refining, Inc.*, Contra Costa
7 Superior Court Case No. MSC18-00415, *Hanna v. Equinix LLC*, Santa Clara Superior Court Case
8 No. 18CV339365, *Pittman v. Martinez Steel Corporation*, San Bernardino Superior Court Case No.
9 CIVDS1823132, *Sanchez v. ExamOne WorldWide, Inc.*, Santa Clara Super Court Case No.
10 17CV30832, and *Siron v. Raypak, Inc.*, Ventura Superior Court Case No. 56-2019-005279959-CU-
11 OE-VTA. As such, the total of my firm's attorneys' fees through final approval is expected to be
12 \$39,450.00.

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

15 Executed on this August 29, 2023, at Hollister, California.

16 

17 William L. Marder
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT A

Everett Alexander v. KBR Technical Services, Inc.
William Marder Time and Task Chart

Hours	Description of Work
5.7	Initial intake
12.6	Review client documents.
17.7	Communications with client regarding case status and settlement.
3.6	Review and edit settlement agreement.
2.3	Review and edit Motion for Preliminary Approval.
4.1	Communications with class members re: settlement.
1.6	Review and edit Motion for Final Approval.
5.0	Anticipated additional time.
52.6	TOTAL HOURS