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Attorneys for Plaintiffs and the Class

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

Coordination Proceeding
Special Title (Rule 3.550)

HUMANO WAGE AND HOUR CASES

Included actions:

Hines v. Humano LLC

Emmens v. Humano LLC

Thurman v. Humano LLC

JUDICIAL COUNCIL COORDINATION
PROCEEDING
No. 5240

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SACRAMENTO
No. 34-2022-00313411

SUPERIOR COURT OF CALIFORNIA
COUNTY OF YOLO
No. CV2021-2225

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN BERNARDINO
No. CIVSB2227784

*[Assigned for all purposes to Hon. Daniel
M. Wolk, Dept. 8]*

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

Date: December 20, 2024
Time: 10:30 a.m.
Dept.: 8

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27 Attorneys for Plaintiffs and the Class

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1. I am an attorney at law duly admitted to practice before all courts in the State of California and am a member of the law firm of the Polaris Law Group, one of the attorneys of record for Plaintiffs Michael Emmens, Jermaine Hines, and Doris Thurman ("Plaintiffs") 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.

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.

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.

1 7. 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 8. I have been approved as class counsel in numerous cases, either as a result of
4 the granting of class certification or as part of the class settlement approval process, including
5 without limitation, the following cases:

- 6 a. *Sison v. Headway Technologies*, Case No. 1-13-CV-254591;
- 7 b. *Barrera v. Home Depot*, Northern District of California Case No. C 12
8 5199 LHK;
- 9 c. *Chavez v. Converse, Inc.*, N.D. Cal. Case No. 15-cv-03746-NC;
- 10 d. *Lao v. H&M Hennes & Mauritz*, N.D. Cal. Case No. 5:16-cv-333 EJD;
- 11 e. *Magadia v. Wal-Mart Assocs.*, N.D. Cal. Case No. 5:17-cv-00062-LHK;
- 12 f. *Naranjo v. Bank of America, N.A.*, N.D. Cal. Case No. C 14-02748 LHK;
- 13 g. *Ortegon-Ramirez v. Cedar Fair*, Santa Clara Sup. Ct. Case No. 1-13-CV-
14 254098;
- 15 h. *Rodriguez v. NIKE Retail Services, Inc.*, N.D. Cal. Case No. 5:14-CV-
16 1508 BLF;
- 17 i. *Vass v. Gardner Trucking*, San Joaquin Sup. Ct. Case No. 39-2013-
18 294819-CU-OE-STK;
- 19 j. *Huertas v. Chevron Stations*, Santa Clara Sup. Ct. Case No.
20 17CV309996;
- 21 k. *Chavez v. Hugo Boss, Inc.*, Santa Clara Sup. Ct Case No. 18CV322644.

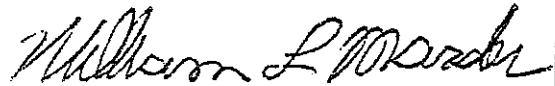
22 9. I was part of the trial team that prevailed on behalf of the certified class in
23 *Magadia v. Wal-Mart Assocs., Inc.*, 384 F. Supp. 3d 1058 (N.D. Cal. 2019), in which we
24 obtained a \$102 million judgment for the class, but which was reversed by the Ninth Circuit. I
25 also am counsel in *Rodriguez v. Nike Retail Servs., Inc.*, 928 F.3d 810, 818 (9th Cir. 2019), in
26 which we prevailed on class certification and in reversing the district court's granting of
27 summary judgment for the employer.

1 10. To date, I have spent approximately 19.00 hours on this case. My current billing
2 rate is \$900.00 per hour. Accordingly, the total lodestar for my hours will be approximately
3 \$17,100 (19.00 hours x \$900). I have been approved at an hourly rate of \$850.00 by various
4 courts in a number of matters, including *Audycki v. Stanford Health Care*, Santa Clara Superior
5 Court Case No. 19CV34 7173; *Stephenson v. Healthcare Services, Inc.*, Orange County
6 Superior Court Case No. 30-2019-01078609-CU-OE-CXC; and *Palomino v. Northrop*
7 *Grumman Systems Corporation*, Santa Clara Superior Court Case No. 19CV345534. As of
8 January 1, 2024, my hourly rate in class and representative actions increased to \$ 900 per hour. I
9 was approved at this rate in the matter of *Robert Jordan v. Mondelez Global LLC*, San
10 Bernardino Superior Court Case No. CIVSB2202758.

11 11. I do not have an interest in, or relationship with, Legal Aid at Work, the
12 proposed *cy pres* recipient.

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

15 Executed on November 12, 2024, at Hollister, California.

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18 William L. Marder
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