

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 Street, Suite 1250
Los Angeles, CA 90071
(213) 488-6555
(213) 488-6554 facsimile

William L. Marder (State Bar No. 170131)
bill@polarislawgroup.com
Polaris Law Group
501 San Benito Street, Suite 200
Hollister, CA 95023
(831) 531-4214
(831) 634-0333 facsimile

Attorneys for Plaintiff and the Class

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

ROBERT JORDAN, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

MONDELEZ GLOBAL LLC, a Delaware
limited liability company; and DOES 1
through 50, inclusive,

Defendants.

Case No.: CIVSB2202758

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

Date: August 31, 2023
Time: 9:00 a.m.
Dept.: 15

Complaint Filed: February 4, 2022
Trial Date: None Set

1 **DECLARATION OF WILLIAM L. MARDER**

2 I, William L. Marder, declare as follows:

3 1. I am an attorney at law, duly licensed to practice before all Courts in the State of
4 California, and am with the law firm Polaris Law Group, counsel of record for Plaintiff Robert
5 Jordan ("Plaintiff"). I have personal knowledge of the facts set forth below and if called to testify I
6 could and would do so competently.

7 2. I am one of the primary attorneys on this matter. Based on my own independent
8 investigation and evaluation, I am of the opinion that settlement for the consideration and on the
9 terms set forth in the Joint Stipulation of Class Action Settlement ("Settlement Agreement" or
10 "Agreement") is fair, reasonable, and adequate and is in the best interests of the Class, in light of all
11 known facts and circumstances and the expenses and risks inherent in litigation.

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

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

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

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

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

27 8. I have been the sole trial attorney in two jury trials in which I represented a plaintiff
28 who prevailed on wrongful termination claims brought pursuant to the California Fair Employment

1 & Housing Act, California Government § 12900 et seq. These two cases are *Gamayo v. Drobny Law*
2 *Offices*, Sacramento Superior Court Case No. 34-2008-00005372CU, and *Cherub Berlanga v.*
3 *Willow Grove School District*, San Benito County Superior Case No. CU-09-00100.

4 9. I have been the sole trial attorney in two court trials in which I represented plaintiffs
5 who prevailed on wage and hour claims. These cases are *Smith v. Joyce*, Monterey County Superior
6 Court Case No. M74334, and *Nava v. Rodriguez*, San Benito County Superior Court Case No. CU-
7 08-00022.

8 10. I have also been approved as class counsel in numerous cases including *Sison v.*
9 *Headway Technologies*, Santa Clara Superior Court Case No. 1-13-CV-254591; *Barrera v. Home*
10 *Depot*, Northern District of California Case No. C 12 5199 LHK; *Markham v. Quik Stop Markets,*
11 *Inc.*, Santa Clara Superior Court Case No. 19CV341582; *Della Maggiora v. Watsonville Community*
12 *Hospital*, Santa Cruz Superior Court Case No. 18CV00191; *Holman v. American Sugar Refining,*
13 *Inc.*, Contra Costa Superior Court Case No. MSC18-00415; *Hanna v. Equinix LLC*, Santa Clara
14 Superior Court Case No. 18CV339365; *Pittman v. Martinez Steel Corporation*, San Bernardino
15 Superior Court Case No. CIVDS1823132; *Sanchez v. ExamOne WorldWide, Inc.*, Santa Clara Super
16 Court Case No. 17CV30832; *Siron v. Raypak, Inc.*, Ventura Superior Court Case No. 56-2019-
17 005279959-CU-OE-VTA; and *Prexxie Pascual and Arturo Fonseca v. Satellite Healthcare, Inc.*,
18 Santa Clara County Superior Court Case No. 19CV345211.

19 11. My co-counsel and I will adequately represent the Class Members in this action.
20 Plaintiff's Counsel have and will zealously represent Plaintiff and the Class and pursue this lawsuit
21 to its conclusion. I have no conflicts with the Class and will adequately represent the Class.

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

24 Executed on this 9 day of August 2023, at Los Angeles, California.

25 
26 _____
27 William L. Marder
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