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Attorneys for Plaintiff Jared Deaver and the Class
(ADDITIONAL COUNSEL ON NEXT PAGE)

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

JARED DEAVER, as an individual and on
behalf of all others similarly situated,

Plaintiff,

v.

BLUE DIAMOND GROWERS, a California
corporation; and DOES 1 through 50,
inclusive,

Defendants.

Lead Case No. 34-2022-00316490-CU-OE-
GDS

[Consolidated with Case No. 34-2021-
00304425-CU-OE-GDS and Case No. 34-2022-
00319378]

*Assigned for All Purposes to Honorable
Lauri A. Damrell in Dept 22*

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

Date: January 31, 2025

Time: 9:00 a.m.

Department: 22

RES. ID: A-316490-001

Action Filed: March 9, 2022

Trial Date: None yet

AND RELATED CONSOLIDATED CASES.

ADDITIONAL COUNSEL

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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, LLP, one of the attorneys of record for Plaintiff Jared Deaver (“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 would competently do so.

2. I along with my co-counsels have diligently litigated this case and will continue to

3. Based on my review of all the information, and based on my experience in class litigation, I believe this settlement to be fair, adequate and reasonable.

ATTORNEY QUALIFICATIONS

4. I graduated from UCLA Law School in 1993 and was admitted to the California State 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. I have defended large institutional employers in employment cases. From 1995- as an associate at Bolling, Walter & Gawthrop in Sacramento, I represented the City of mento, Yolo County, the City of Davis, Solano County and other employers in employment on in state and federal courts.

6. From 1997-2000, I served as a Deputy County Counsel in San Benito, handling its employment matters. These matters include advising the county on compliance with and hour laws, arbitrations, and litigation. From 2002-2006, I was a partner at Paxton n, LLP in Hollister, an AV rated firm, where I represented numerous plaintiffs and ants 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.

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

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

11 10. Finally, I have also been approved as class counsel in numerous cases including
12 *Sison v. Headway Technologies*, Case No. 1-13-CV-254591 and *Barrera v. Home Depot*,
13 Northern District of California Case No. C 12 5199 LHK.

14 11. Pursuant to a previously signed agreement by all plaintiffs and their counsel,
15 Plaintiffs' Counsel will be splitting the approved fees as follows: 35% to the Bibyan Law
16 Group, P.C.; 35% to Crosner Legal, P.C.; 9.75% to Diversity Law Group; 9.75% to the Law
17 Offices of Choi & Associates and 10.5% to the Polaris Law Group.

18 12. Pursuant to Local Rule 2.99.05, I have reviewed the checklist for approval of
19 class action settlement for the Complex Litigation Department and believe that the Settlement
20 Agreement complies with the same.

21 I declare under penalty of perjury under the laws of the State of California that the
22 foregoing is true and correct. Executed on January 6, 2025, at Hollister, California.

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25 William L. Marder
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