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Attorneys for Plaintiff Angelica Romero

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF RIVERSIDE

MARIANO GAGLIARDI, individually and on
behalf of all similarly situated and aggrieved
employees,

Plaintiff,

v.

RALPH LAUREN RETAIL, INC., a Delaware
Corporation doing business in California, and
DOES 1 to 100,

Defendants.

Case No. CVRI2103581

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

Date: November 20, 2024

Time: 8:30 a.m.

Dept.: 1

Reservation ID: Per July 12, 2024 Order

AND CONSOLIDATED ACTION.

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

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

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

25 10. To date, my firm has incurred approximately 23.2 hours on this case. I have attached
26 a summary of the time I have spent on this matter, as **Exhibit A**, which reflects a breakdown of the
27 hours and activities spent by my firm on this matter. My current billing rate is \$850.00 per hour.
28 Since 2020, I have been approved at \$750 per hour. In 2020, U.S. District Judge David Davila

1 approved my hourly rate of \$750 in *Ramirez v. Walgreen*, N.D. Cal. Case No. 18-cv-03921-EJD
2 (Dkt. No. 34), as well as the Santa Clara County Superior Court in *Hernandez v. Wells Fargo Bank*,
3 Santa Clara Sup. Ct. Case No. 16CV299319. Starting in January 2023, I increased my rate to \$850.

4 11. Counsel for Plaintiffs Mariano Gagliardi and Angelica Romero will be splitting the
5 approved fees as follows: 32.5% to Diversity Law Group; 17.5% to Polaris Law Group; and 50% to
6 Frontier Law Center, which the Plaintiffs have previously authorized in writing.

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

9 Executed on this 23 day of October 2024, at Hollister, California.

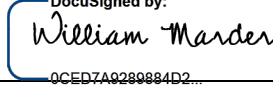
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EXHIBIT A

Angelica Romero v. Ralph Lauren Retail, Inc.
William L. Marder Time and Task Chart

Hours	Description of Work
11.8	Perform client intake and interview; analyze and review documents provided by client upon receipt; confer with co-counsel re anticipated claims and discuss same with client.
1.4	Confer with client re case progress and anticipated documents needed for discovery process; conduct further interview and discussion with client re progress of case following receipt of information regarding anticipated defenses to be asserted by employer.
3.1	Confer with client re proposed mediation; discuss data and further questions with client in advance of mediation.
1.6	Confer with client post-mediation; address follow up questions re same.
3.4	Confer with client and co-counsel re proposed settlement; analyze, review, and further revise settlement agreement and supporting documents.
1.9	Draft and revise documentation in support of approval motions for settlement.
23.2	TOTAL HOURS