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Attorneys for Plaintiff and Aggrieved Employees

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

ZACHARY THOMPSON, as an individual
and on behalf of all others similarly situated,

Plaintiff,

vs.

D & K ENGINEERING, a California
corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No.: 37-2022-00026832-CU-OE-CTL

[Assigned for all purposes to the Hon. Marcella O.
McLaughlin, Department C-72]

**DECLARATION OF WILLIAM L. MARDER
IN SUPPORT OF PLAINTIFF’S MOTION TO
APPROVE SETTLEMENT AGREEMENT
PURSUANT TO THE PRIVATE ATTORNEYS
GENERAL ACT OF 2004**

Date: January 24, 2025
Time: 9:30 a.m.
Courtroom: C-72

Action Filed: July 8, 2022
Trial Date: None Set

[illegible]

I, William L. Marder, declare as follows:

1. I am an attorney at law, duly licensed to practice before all Courts in the State of California, and am with the law firm Polaris Law Group, counsel of record for Named Plaintiff [redacted] Thompson (“Plaintiff”). I have personal knowledge of the facts set forth below and if sworn to testify I could and would do so competently.

2. I support the settlement as fair, reasonable, and adequate, and in the best interest of Plaintiff and aggrieved employees as a whole.

3. 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.

4. 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 Yuba City, the City of Marysville, the City of Yuba, 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 employment matters. These matters include advising the county on compliance with minimum wage and hour laws, arbitrations, and litigation.

5. From 2002-2006, I was a partner at Paxton O'Brien, LLP in Hollister, an AV 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
g employment cases. I primarily represent employees.

To date, my firm has incurred approximately 17.3 hours on this case. I have a summary of the time I have spent on this matter, as **Exhibit A**, which reflects a down of the hours and activities spent by my firm on this matter.

9. My current billing rate is \$850.00 per hour. I have previously been approved at an rate of \$850.00 by various courts in a number of matters, including most recently in

1 *Audycki v. Stanford Health Care*, Santa Clara Superior Court Case No. 19CV347173 and
2 *Palomino v. Northrop Grumman Systems Corporation*, Santa Clara Superior Court Case No.
3 19CV345534. As such, the total lodestar for my hours is expected to be approximately
4 \$14,705.00 (17.3 hours x \$850).

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

7 Executed on this 18th day of December 2024, at Hollister, California.

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EXHIBIT A

Thompson v. D & K Engineering
William L. Marder Time and Task Chart

Hours	Description of Work
4.3	Perform client intake/interview and follow up calls; and prepare client notes.
5.7	Analyze and review documents provided by client upon receipt; evaluate for further potential issues to investigate; confer with client following review and obtain additional factual background to support claims.
2.9	Confer with client re anticipated mediation; discuss data and further information requested from client to prepare for same.
1.0	Confer with client following mediation; address questions posed re next steps.
1.4	Analyze and review settlement agreement and proposed notice; provide comment re same.
.9	Confer with client re settlement agreement; answer questions and provide clarification re same.
1.1	Further draft and revise documentation in support of approval motion; confer with client re declaration and motion.
17.3	TOTAL HOURS