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Attorneys for Plaintiff and the Class

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

ERIC CHAVEZ, as an individual and on
behalf of all others similarly situated,

Plaintiffs,

vs.

CONVERSE, INC., a Delaware
corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No.: 15-cv-03746-NC

**DECLARATION OF WILLIAM
MARDER IN SUPPORT OF MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: July 8, 2020

Time: 1:00 P.M.

Courtroom: 5, 4th Floor

Judge: Hon. Nathanael Cousins

DECLARATION OF WILLIAM L. MARDER

I, WILLIAM L. MARDER, hereby declare and state as follows:

1. I am an attorney at law duly admitted to practice before all courts in the State of California and am a partner of the law firm of the Polaris Law Group, LLP, one of the attorneys of record for Plaintiff Eric Chavez ("Plaintiff"), in the above entitled action.

2. 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. I am one of the primary attorneys on this matter. 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 300 employment cases, litigating cases in state and federal courts.

4. I have defended large institutional employers in employment cases. From 1995-1997, as an associate at Bolling, Walter & Gawthrop in Sacramento, I represented the City of Sacramento, 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 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.

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

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

8 11. Based on my own independent investigation and evaluation, I am of the opinion that the
9 settlement for the consideration and on the terms set forth in the Settlement Agreement is fair,
10 reasonable, and adequate and that the settlement is in the best interests of the Settlement Class, in light
11 of all known circumstances and the expenses and risks inherent in litigation. I also believe in the fairness
12 of the settlement based on factoring in the uncertainty and risks to Plaintiff involved in not prevailing on
13 his certified class claims at trial and the possibility of appeals.

15 || 13. I do not have any relationship with Legal Aid at Work.

18 Executed on June 3, 2020, at Hollister, California.

19 _____
20 /s/ William L. Marder
WILLIAM L. MARDER