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Attorneys for Plaintiff and the Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

MAYRA RAMIREZ, as an individual and on behalf of all similarly situated,

Plaintiff,

vs.

SHERWOOD MANAGEMENT CO. INC., a California corporation; and DOES 1 through 50, inclusive,

Defendants.

Case No.: BC609901

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

Judge: Hon. Kenneth R. Freeman
Date: April 10, 2018
Time: 2:00 p.m.
Dept: 310

DECLARATION OF WILLIAM L. MARDER

I, WILLIAM L. MARDER, hereby 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 Mayra Ramirez ("Plaintiff"). I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. This current action was resolved after Plaintiff's counsel conducted significant discovery, including written discovery, and reviewed, substantial class data. Based on my investigation and research in this case, I have determined that the settlement is a fair, reasonable, and adequate settlement, and is in the best interests of the Class Members and Defendant in light of all known facts and circumstances and the risks inherent in litigation, including the risk of potential appeals.

3. I have received a number of calls during the settlement administration process from Class Members with questions about the case and the current settlement, all of which have been responded to.

4. To date, I have incurred approximately 143 hours on this case.

5. I also anticipate spending an additional 5 hours through the conclusion of this case, including conferring with class members regarding the case status.

6. My current billing rate is at \$650.00 per hour. As such, the total of my firm's attorney's fees through final approval is expected to be \$96,200.00 (148 hours x \$650 per hour). I have been approved at this rate by various Courts, including, but not limited to, *Naranjo v. Bank of America, N.A.*, Northern District of California Case No. 5:14-cv-02748-LHK, *Sison v. Headway Technologies*, Santa Clara Superior Court Case No. 1-13-CV-254591, *Parr v. Golden State Overnight*, Alameda Superior Court Case No. RG12618103, and *Barrera v. Home Depot*, Northern District of California, Case No. C 12 5199 LHK..

7. In addition, to date, my firm has incurred costs in the amount of \$1,719.33. A breakdown of the costs incurred by my firm are attached hereto as Exhibit A.

8. 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 Plaintiff and Defendant. I estimate that I have handled more than 200 employment cases, litigating cases in state and federal courts.

9. 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.

10. 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.

11. From 2002-2006, I was a partner at Paxton O'Brien, LLP in Hollister, an AV rated firm, where I represented numerous Plaintiff and Defendant in employment lawsuits.

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

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

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

Executed on this 17 day of March, 2018 at San Jose, California.

William L. Marder
William L. Marder

EXHIBIT A

Polaris Law Group LLP
501 San Benito Street, Suite 200
Hollister, CA 95023
831-531-4211

March 19, 2018

Mayra Ramirez
211 6th Street
Gonzales, CA 93926

In Reference To: v. Sherwood Management Company, Inc.
15-0056

Invoice # 12611

Additional Charges :

	<u>Amount</u>
12/21/2016 Flight/Hotel.	1,119.33
4/17/2017 Case Anywhere Fees.	240.00
7/6/2017 Case Anywhere Fees.	120.00
10/5/2017 Case Anywhere Fees.	120.00
1/10/2018 Case Anywhere Fees.	120.00
Total additional charges	<u>\$1,719.33</u>
Balance due	<u>\$1,719.33</u>

(Code of Civil Procedure Sections 1013a, 2015.5)


Olympia Peña