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Attorneys for Plaintiff and the Class

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

MICHAEL CONNER, as an individual and
on behalf of all others similarly situated,

Plaintiff,

vs.

RED WING BRANDS OF AMERICA,
INC., a Minnesota corporation; and
DOES 1 through 50, inclusive,

Defendants.

Case No.: 22CIV03830

[Assigned for all purposes to the Hon. V. Raymond
Swope, Department 23]

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

Date: August 12, 2024
Time: 3:00 P.M.
Dept.: 23

Action Filed: September 20, 2022
Trial Date: Not Set

1 **DECLARATION OF WILLIAM L. MARDER**

2 I, William L. Marder, hereby declare and state as follows:

3 1. I am an attorney at law duly admitted to practice before all courts in the State of
4 California and am a partner of the law firm of the Polaris Law Group, one of the attorneys of
5 record for Plaintiff Michael Conner ("Plaintiff"), in the above-entitled action. I have personal
6 knowledge of the matters set forth herein, and if called upon as a witness to testify thereto, I
7 could and would competently do so.

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

10 3. I have been approved as class counsel in numerous other wage/hour class actions
11 that have been granted class certification and final approval.

12 4. I graduated from UCLA Law School in 1993 and was admitted to the California
13 Bar in 1994. Since that time, I have acquired substantial experience in employment litigation. I
14 have represented both plaintiffs and defendants. I estimate that I have handled more than 200
15 employment cases, litigating cases in state and federal courts.

16 5. I have defended large institutional employers in employment cases. From 1995-
17 1997, as an associate at Bolling, Walter & Gawthrop in Sacramento, I represented the City of
18 Sacramento, Yolo County, the City of Davis, Solano County and other employers in employment
19 litigation in state and federal courts.

20 6. From 1997-2000, I served as a Deputy County Counsel in San Benito, handling
21 all of its employment matters. These matters include advising the county on compliance with
22 wage and hour laws, arbitrations, and litigation.

23 7. From 2002-2006, I was a partner at Paxton O'Brien, LLP in Hollister, an AV
24 rated firm, where I represented numerous plaintiffs and defendants in employment lawsuits.

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

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

5 Executed on this 5th day of June 2024, at Hollister, California.

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7 William L. Marder
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