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Attorneys for Plaintiffs, the Class, and Aggrieved Employees

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN JOAQUIN

TIMA HIM, as an individual and on behalf
of all others similarly situated,

Plaintiff,

vs.

WESTLAKE MANAGEMENT
SERVICES, INC., a Delaware
corporation; WESTLAKE CHEMICAL &
VINYLs LLC, a Delaware limited liability
company; WESTLAKE CHEMICAL, a
business organization, form unknown; and
DOES 1 through 50, inclusive,

Defendants.

Case No.: STK-CV-UOE-2025-0008956

[Assigned for all purposes to the Hon. Robert T.
Waters, in Department 11B]

**DECLARATION OF WILLIAM L. MARDER
IN SUPPORT OF PLAINTIFF’S MOTION
FOR PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: July 21, 22, 23, 24, or 29, 2026

Time: 9:00 a.m.

Dept.: 11B

1 I, William L. Marder, declare as follows:

2 1. I am an attorney at law, duly licensed to practice before all Courts in the State of
3 California, and am with the law firm Polaris Law Group, counsel of record for Plaintiff Tima H
4 (“Plaintiff”). I have personal knowledge of the facts set forth below and if called to testify I could
5 and would do so competently.

6 2. The Joint Stipulation of Class Action and PAGA Settlement (“Agreement” or
7 “Settlement Agreement”) was the product of negotiations between highly able and experienced
8 attorneys on both sides who possessed the relevant data and conducted extensive legal research.
9 Additionally, my co-counsel and I conducted significant investigation in this case, including
10 informal discovery and exchanges of information regarding data and payroll records for the
11 putative class, as well as documents and information pertaining to Defendant’s policies and
12 practices.

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

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

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

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

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

28 8. I have been approved as class counsel in numerous cases, either as a result of the

granting of class certification or as part of the class settlement approval process, including without limitation, the following cases:

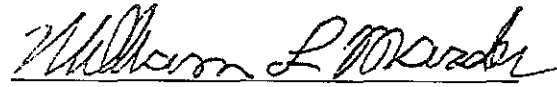
- a. *Sison v. Headway Technologies*, Case No. 1-13-CV-254591;
- b. *Barrera v. Home Depot*, Northern District of California Case No. C 12 5199 LHK;
- c. *Chavez v. Converse, Inc.*, N.D. Cal. Case No. 15-cv-03746-NC;
- d. *Lao v. H&M Hennes & Mauritz*, N.D. Cal. Case No. 5:16-cv-333 EJD;
- e. *Magadia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

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

10. My co-counsel and I will adequately represent the Class Members in this action. Plaintiff's counsel have and will zealously represent Plaintiff and the Class and pursue this lawsuit to its conclusion.

1 11. Class Counsel does not have any affiliation or conflict of interest with Legal Aid at
2 Work.

3 I declare under penalty of perjury under the laws of the State of California that the
4 foregoing is true and correct. Executed on June 15, 2026, at Hollister, California.
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8 William L. Marder
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