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Attorneys for Plaintiff and the Aggrieved Employees

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**FOR THE COUNTY OF PLACER**

JASON GEORGE, as an individual and on  
behalf of all others similarly situated,

Plaintiff,

v.

PALISADES TAHOE RESORT, LLC, a  
Delaware Limited Liability Company;  
SQUAW VALLEY RESORT, LLC, a  
business organization, form unknown; and  
DOES 1 through 50, inclusive,

Defendants.

CASE NO. S-CV-0049766

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

Date: October 31, 2024

Time: 8:30 A.M.

Dept.: 3

Action Filed: January 19, 2023

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 Jason George ("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.

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

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

1 Executed on this 9<sup>th</sup> day of October 2024, at Hollister, California.

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