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Attorneys for Plaintiff and the Class

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

JOSE VASQUEZ RUIZ, as an individual
and on behalf of all others similarly
situated,

Plaintiff,

vs.

PERDUE FOODS, LLC., a Maryland
limited liability company; and DOES 1
through 50, inclusive,

Defendants.

Case No.: SCV 264649

(Assigned to the Honorable Patrick M. Broderick,
Dept. 16)

**DECLARATION OF WILLIAM L. MARDER
IN SUPPORT OF PLAINTIFF JOSE
VASQUEZ RUIZ'S MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Date: May 12, 2021

Time: 3:00 P.M.

Dept.: 16

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 Jose Vasquez Ruiz ("Plaintiff"), in the above entitled action. 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.

2. Based on Class Counsel's independent investigations and evaluations, I am of the opinion that the proposed settlement is fair, reasonable, and adequate, and is in the best interests of the Class Members, in light of all known facts and circumstances, and the expenses and risks inherent in litigation. The settlement was negotiated at arm's length and was facilitated by an experienced and neutral mediator. Thus, this settlement should be granted final approval.

3. 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 200 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. To date, my firm has incurred approximately 29.4 hours on this case. I have

1 attached a summary of the time I have spent on this matter, as **Exhibit A**, which reflects a
2 breakdown of the hours and activities spent by my firm on this matter.

3 9. My current billing rate is at \$750.00 per hour. I have been approved at my hourly
4 rate of \$700.00 since 2018, including in cases, *Huertas v. Chevron Stations*, Santa Clara Sup. Ct.
5 Case No. 17CV309996, and *Chavez v. Hugo Boss, Inc.*, Santa Clara Sup. Ct. Case No.
6 18CV322644. As of 2020, I increased my hourly rate to \$750.00 per hour. I have been approved
7 at \$750.00 per hour by the United States District Court for the Northern District of California in
8 *Ramirez v. Walgreen*, N.D. Cal. Case No. 18-cv-03921-EJD (Dkt. No. 34) and *Reilly v.*
9 *Recreational Equipment, Inc.*, N.D. Cal. Case No. 3:18-cv-07385-LB (Dkt. No. 61), and the
10 Santa Clara County Superior Court in *Hernandez v. Wells Fargo Bank*, Santa Clara Sup. Ct.
11 Case No. 16CV299319. As such, the total of my firm's attorneys' fees through final approval is
12 expected to be \$22,050.

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

15 Executed on April 20, 2021, at San Jose, California.

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17 William L. Marder
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EXHIBIT A

Jose Vasquez Ruiz v. Perdue Foods, LLC
Time and Task Chart for William L. Marder

<u>Hours</u>	<u>Description of Work</u>
1.6	Review documents provided by client. Do public records search for other lawsuits against employer. Telephone conferences with client re potential case.
3.3	Research and analysis re defendant's liability for Labor Code violations and likely penalties which could be obtained.
1.2	Analysis re suitability of case to be brought as a class action.
4.8	Review demurrer; research and analysis in support of opposition.
4.5	Analysis re discovery which must be done to prove liability.
6.5	Review documents obtained in the case to value case; analysis re risk of summary judgment; and likelihood of class certification. Determine case value.
2.5	Review, analyze and edit multiple drafts of settlement agreement and supporting documents. Explain settlement to client and obtain client's signature.
3.5	Review, analyze and edit motion for preliminary approval and supporting documents.
1.5	Review, analyze and edit motion for final approval and supporting documents.

TOTAL: 29.4