

Larry W. Lee (State Bar No. 228175)  
Kristen M. Agnew (State Bar No. 247656)  
Nicholas Rosenthal (State Bar No. 268297)  
**DIVERSITY LAW GROUP, P.C.**  
515 S. Figueroa Street, Suite 1250  
Los Angeles, CA 90071  
(213) 488-6555  
(213) 488-6554 facsimile

William L. Marder, Esq. (State Bar No. 170131)  
**Polaris Law Group LLP**  
501 San Benito Street, Suite 200  
Hollister, CA 95023  
Tel: (831) 531-4214  
Fax: (831) 634-0333

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  
PRELIMINARY APPROVAL OF CLASS  
ACTION AND PAGA SETTLEMENT**

Date: TBD  
Time: TBD  
Dept.: 16

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

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. I am one of the primary attorneys on this matter. 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 300 employment cases, litigating cases in state and federal courts.

3. 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.

4. 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.

5. 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.

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

7. I have been the sole trial attorney in two jury trials in which I represented a plaintiff who prevailed on wrongful termination claims brought pursuant to the California Fair Employment & Housing Act, California Government § 12900 *et seq.* These two cases are: *Gamayo v. Drobny Law Offices*, Sacramento Superior Court Case No.: 34-2008-00005372CU;

1 and *Cherub Berlanga v. Willow Grove School District*, San Benito County Superior Case No.:  
2 CU-09-00100.

3 8. I have been the sole trial attorney in two court trials in which I represented  
4 plaintiffs who prevailed on wage and hour claims. These cases are: *Smith v. Joyce*, Monterey  
5 County Superior Court Case No.: M74334; and *Nava v. Rodriguez*, San Benito County Superior  
6 Court Case No.: CU-08-00022.

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

10 10. Based on my own independent investigation and evaluation, I am of the opinion  
11 that the settlement for the consideration and on the terms set forth in the Settlement Agreement is  
12 fair, reasonable, and adequate and that the settlement is in the best interests of the class, in light  
13 of all known circumstances and the expenses and risks inherent in litigation. I also believe in the  
14 fairness of the settlement based on factoring in the uncertainty and risks to Plaintiff involved in  
15 not prevailing on his certified class claims at trial and the possibility of appeals.

16 11. I have no conflicts with the class and will adequately represent the class.

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

19 Executed on September 1<sup>st</sup>, 2020, at Hollister, California.

20 

21 WILLIAM L. MARDER  
22  
23  
24  
25  
26  
27  
28