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11 [Additional Counsel Information on Next Page]

12
13 SUPERIOR COURT OF THE STATE OF CALIFORNIA
14 FOR THE COUNTY OF STANISLAUS

15 CHELSEY RICHARDSON, BETHANY
16 JEANNE REINKER, and CHARMAINE
HUFF as individuals and on behalf of all
17 others similarly situated and aggrieved
employees,

18 Plaintiffs,

19 vs.

20 TELECARE CORPORATION, a
California corporation; and DOES 1
21 through 50, inclusive,

22 Defendants.

Case No. CV-24-006292

[Assigned for All Purposes to:
Hon. John R. Mayne, Dept. 21]

**DECLARATION OF WILLIAM L.
MARDER IN SUPPORT OF PLAINTIFFS'
MOTION FOR FINAL APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Date: May 29, 2026
Time: 8:30 a.m.
Dept.: 21

Action Filed: August 9, 2024
Trial Date: None Set

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7. 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.

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

9. 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 three cases are: *Gamayo v. Drobny Law Offices*, Sacramento Superior Court Case No. 34-2008-00005372CU; and *Cherub Berlanga v. Willow Grove School District*, San Benito County Superior Case No. CU-09-00100.

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

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

12. My co-counsel and I will adequately represent the Class in this action. Plaintiff's counsel have and will zealously represent Plaintiff and the Class and pursue this lawsuit to its conclusion. I have no conflicts with the Class and will adequately represent the Class.

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

Executed on April 20, 2026 at Hollister, California.

William L. Mark

William L. Marder