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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SACRAMENTO

NATALIA TAN, as an individual and on behalf of all others similarly situated, and as a private attorney general,

Plaintiff,

vs.

ASURION INSURANCE SERVICES, INC., a Tennessee corporation; and DOES 1 through 50, inclusive,

Defendants.

Case No. 24CV000032

[Hon. Jill H. Talley, Department 8A]

DECLARATION OF WILLIAM L. MARDER IN SUPPORT OF PLAINTIFF'S MOTION FOR APPROVAL OF PAGA SETTLEMENT

Date:	November 20, 2026
Time:	9:00 a.m.
Department:	8A
Complaint Filed:	January 2, 2024

I, William L. Marder, declare as follows:

1. I am an attorney admitted to practice in the State of California and am a partner of the law firm of Polaris Law Group, one of the attorneys of record for Plaintiff. I make this declaration on the basis of my own personal knowledge, except as to those matters stated on information and belief and, as to those matters, I believe them to be true. If called as a witness, I could testify competently as to the facts stated in this declaration.

2. Based on my experience in class and Labor Code Private Attorneys General Act of 2004, Lab. Code §§ 2698 et seq. ("PAGA") litigation, I believe this settlement to be fair, adequate, and reasonable in light of PAGA's policies and in furtherance of PAGA's purposes. I believe in the fairness of the settlement, based on the uncertainty and risks to Plaintiff and the State from the prospect of not prevailing on one or more of the causes of action or theories alleged in the operative complaint, the possibility of non-certification, and potential for appeals. This settlement was obtained for the benefit of the State.

3. 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.

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

9. 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.

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

11. Since at least 2020, I have been approved at an hourly rate of $750.00 per hour in a number of cases, including but not limited to: *Markham v. Quik Stop Markets, Inc.*, Santa Clara Superior Court Case No.19CV341582, *Della Maggiora v. Watsonville Community Hospital*, Santa Cruz Superior Court Case No. 18CV00191, *Holman v. American Sugar Refining, Inc.*, Contra Costa Superior Court Case No. MSC18-00415, *Hanna v. Equinix LLC*, Santa Clara Superior Court Case No. 18CV339365, *Pittman v. Martinez Steel Corporation*, San Bernardino Superior Court Case No. CIVDS1823132, *Sanchez v. ExamOne WorldWide, Inc.*, Santa Clara Super Court Case No. 17CV30832, *Siron v. Raypak, Inc.*, Ventura Superior Court Case No. 56-2019-005279959-CU-OE-VTA, and *Prexxie Pascual and Arturo Fonseca v. Satellite Healthcare, Inc.*, Santa Clara County Superior Court Case No. 19CV345211.

12. I have also been approved at an hourly rate of $800.00 per hour in *Martinez and Acosta v. City of Hope National Medical Center et al.*, San Bernardino Superior Court Case No. CIVDS2015729, *Jaime Moen v. Genentech, Inc.*, San Diego Superior Court Case No. 37-2021-00008619-CU-OE-CTL, *Murray v. Granite Wellness Centers et al.*, Nevada Superior Court Case No. CU20-084680, and *Smith et al. v. Clean Harbors Environmental Services, Inc.*, Sacramento Superior Court Case No. 34-2021-00292526.

13. My current billing rate is $900.00 per hour. I have been approved at an hourly rate of $900.00 per hour in *Bendorf v. Sea World LLC*, San Diego Superior Court Case No. 37-2021-00034922-

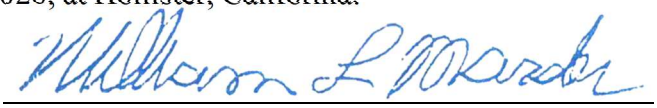
CU-OE-CTL, *Middlebrooks v. FleetPride, Inc.*, Shasta Superior Court Case No. 23CV-0202247, and *Lasiter v. Hayward Sisters Hospital*, Alameda Superior Court Case No. 24CV061793.

14. To date, I have incurred approximately 35.9 hours on this case. Attached as **Exhibit A** is a summary of my hours and tasks on this matter. Accordingly, the total lodestar for my hours will be approximately $32,310.00 based on an hourly rate of $900.00 per hour [35.9 hours x $900.00 per hour].

15. My office has not incurred any costs in the litigation of this matter.

16. I understand that the attorneys' fees awarded in this action will be split 65% to Diversity Law Group, P.C. and 35% to Polaris Law Group.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 20th day of October 2026, at Hollister, California.



William L. Marder

EXHIBIT A

Time and Task Summary
for Tan v. Asurion Insurance Services, Inc.
William L. Marder

Description of Work	Hours
Conduct initial interviews and investigation of plaintiff's claims	4.0
Review additional materials from plaintiff	1.8
Research defendant's operations and investigate prior or pending litigation	2.2
Discuss plaintiff's claims, proposed litigation strategy, and assessment with plaintiff and co-counsel	4.8
Review LWDA letter and complaint and discuss with co-counsel	1.1
Review and reply to various emails with plaintiff and co-counsel	3.4
Discuss arbitration agreement and arbitration with plaintiff and co-counsel	2.2
Review written discovery responses with plaintiff	0.8
Discuss defendant's position with co-counsel, review defendant's documents, and discuss with plaintiff	2.8
Review opposition to summary judgment and discuss with plaintiff and co-counsel	2.6
Review mediation production and data	1.2
Review mediation brief and discuss with co-counsel	1.8
Discuss mediation and settlement with plaintiff	2.2
Discuss general release of claims, approval process, and other questions with plaintiff	2.4
Review settlement approval papers and prepare supporting declaration	2.6
TOTAL	**35.9**