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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ALAMEDA

DONTE BOOZE, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

AIR LIQUIDE ADVANCED
MATERIALS, INC., a Delaware
corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No.: 24CV060686

**DECLARATION OF WILLIAM L.
MARDER IN SUPPORT OF
PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: January 15, 2026

Time: 10:00 a.m.

Dept.: 18

Reservation No. 318479431349

DONTE BOOZE, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

AIR LIQUIDE ADVANCED
MATERIALS, INC., a Delaware
corporation; and DOES 1 through 50,
inclusive,

Defendants.

1 William L. Marder (SBN 170131)

2 bill@polarislawgroup.com

3 **POLARIS LAW GROUP**

4 501 San Benito Street, Suite 200

5 Hollister, CA 95023

6 Telephone: (831) 531-4214

7 Facsimile: (831) 634-0333

8 Attorneys for Plaintiff and the Class

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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.

3. To date, I have spent approximately 41.6 hours prosecuting this action. Attached hereto as **Exhibit A** is a summary of the hours I have spent on this matter to date.

5. 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.

1 6. I have defended large institutional employers in employment cases. From 1995-
2 1997, as an associate at Bolling, Walter & Gawthrop in Sacramento, I represented the City of
3 Sacramento, Yolo County, the City of Davis, Solano County, and other employers in
4 employment litigation in state and federal courts.

5 7. From 1997-2000, I served as a Deputy County Counsel in San Benito, handling
6 all of its employment matters. These matters include advising the county on compliance with
7 wage and hour laws, arbitrations, and litigation.

8 8. From 2002-2006, I was a partner at Paxton O'Brien, LLP in Hollister, an AV
9 rated firm, where I represented numerous plaintiffs and defendants in employment lawsuits.

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

12 10. I have been the sole trial attorney in two jury trials in which I represented a
13 plaintiff who prevailed on wrongful termination claims brought pursuant to the California Fair
14 Employment & Housing Act, California Government § 12900 et seq. These two cases are
15 *Gamayo v. Drobny Law Offices*, Sacramento Superior Court Case No. 34-2008-00005372CU,
16 and *Cherub Berlanga v. Willow Grove School District*, San Benito County Superior Case No.
17 CU-09-00100.

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

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

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

3 Executed on December 19, 2025, at Los Angeles, California.

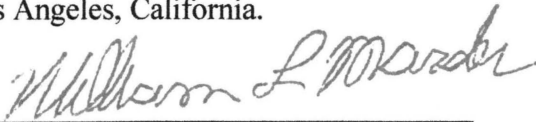
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6 William L. Marder
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EXHIBIT A

Booze v. Air Liquide Advanced Materials
Superior Court of the State of California – County of Alameda
Case No. 24CV060686
Case No. 24CV068970
Time and Task Chart – William L. Marder

Hours	Description of Work
3.5	Confer with potential client; review client documents re potential lawsuit
1.6	Review and revise Class Action Complaint
2.2	Review Notice of Removal; confer with counsel re remand issues
.9	Review and revise PAGA Complaint
1.1	Review and revise initial disclosures
1.4	Review and revise written discovery
2.7	Review defendant's discovery responses; confer with co-counsel re same
1.8	Confer with co-counsel re mediation and class data for mediation
3.9	Review class data produced by defendant; review and revise class damages
4.2	Review and revise mediation brief for first mediation
5.7	Review Defendant's motion to compel arbitration and supporting documents; review and revise opposition to same; review reply brief re same; confer with co-counsel re same
1.1	Review and revise MOU; confer with counsel and client re same
2.6	Review and revise formal Settlement Agreement
3.3	Review and revise Motion for Preliminary Approval; confer with counsel re same
1.9	Review and revise amendment to settlement agreement and supplemental brief re same; confer with counsel re same
1.6	Confer with class members regarding the settlement process
2.1	Review and revise Motion for Final Approval
41.6	TOTAL HOURS