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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
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: August 7, 2025

Time: 10:00 a.m.

Dept.: 23

Reservation ID.: 080440422011

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

1 **DECLARATION OF WILLIAM L. MARDER**

2 I, William L. Marder, declare as follows:

3 1. I am an attorney at law, duly licensed to practice before all Courts in the State of
4 California, and am with the law firm Diversity Law Group, counsel of record for Plaintiff Donte
5 Booze.

6 2. From the inception of the case, Class Counsel has zealously represented the
7 interests of the Class. Class Counsel issued written discovery and engaged in significant meet
8 and confer discussions with opposing counsel to obtain informal data and documents on behalf
9 of the Class. This settlement was obtained for the benefit of the Class, as opposed to the
10 individual Class Representative.

11 3. I have spent significant time researching and pursuing the claims that have been
12 alleged in this action. The Parties engaged in formal discovery, as well as informal discovery in
13 connection with mediation, and participated in the exchange of class data and Defendant's
14 pertinent policies and practices. Based on my review of all the documents and information, and
15 based on my experience in class action litigation, I believe this settlement to be fair, adequate,
16 and reasonable.

17 4. I was retained based upon a contingency fee arrangement wherein Plaintiffs'
18 counsel agreed to advance all costs and receive no fee unless a recovery was accomplished.
19 Specifically, had Plaintiffs failed to prevail in this case, counsel for Plaintiffs would have spent a
20 significant amount of time, money and other resources without any benefit or return. In addition,
21 had Plaintiffs also failed to prevail in the present case, Defendant would have been able to seek
22 costs in connection with their defense of the case.

23 5. I graduated from UCLA Law School in 1993 and was admitted to the California
24 Bar in 1994. Since that time, I have acquired substantial experience in employment litigation. I
25 have represented both plaintiffs and defendants. I estimate that I have handled more than 300
26 employment cases, litigating cases in state and federal courts.

27 6. I have defended large institutional employers in employment cases. From 1995-
28 1997, as an associate at Bolling, Walter & Gawthrop in Sacramento, I represented the City of

1 Sacramento, Yolo County, the City of Davis, Solano County, and other employers in
2 employment litigation in state and federal courts.

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

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

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

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

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

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

23 13. My co-counsel and I will adequately represent the Class Members in this action.
24 Class Counsel has and will zealously represent Plaintiff and the Class and pursue this lawsuit to
25 its conclusion.

26 14. I have no conflicts with the Class and will adequately represent the Class.

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

1 Executed on July 16, 2025, at Los Angeles, California.

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3 William L. Marder
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