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8 Attorneys for Plaintiffs MILTON URBINA AND HECTOR ZAVALA

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **FOR THE COUNTY OF SANTA BARBARA**

11 MILTON URBINA and HECTOR ZAVALA,
12 an individual and on behalf of all others
13 similarly situated;

14 Plaintiffs,

15 vs.

16 MONTECITO RETIREMENT
17 ASSOCIATION, a California corporation; and
18 DOES 1 through 50,

19 Defendants.

Case No.: 24CV03420

[Assigned for All Purposes to:
Hon. Thomas P Anderle, Dept. 3]

**DECLARATION OF WILLIAM L.
MARDER IN SUPPORT OF
PLAINTIFFS' MOTION FOR
APPROVAL OF PAGA SETTLEMENT,
ATTORNEY'S FEES AND COSTS, AND
SERVICE AWARD**

(Filed Concurrently with Notice of Motion
and Motion and [Proposed] Judgment and
Order)

DATE: December 9, 2026

TIME: 10:00 a.m.

DEPT: 3

Action Filed: June 18, 2024

Trial Date: Not Set

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I, William L. Marder, declare as follows:

1. I am an attorney at law, duly licensed to practice before all Courts in the State of California, and am with the law firm Polaris Law Group, counsel of record for Named Plaintiff Hector Zavala (“Plaintiff”). I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.
2. I support the settlement as fair, reasonable, and adequate, and in the best interest of the Plaintiffs and the Aggrieved Employees as a whole.
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 200 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. To date, my firm has incurred approximately 18.8 hours on this case. I have attached a summary of the time I have spent on this matter, as **Exhibit A**, which reflects a breakdown of the hours and activities spent by my firm on this matter.
9. 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 County Superior Court Case No. 37-

1 2021-00034922-CU-OE-CTL and *Middlebrooks v. FleetPride, Inc.*, Shasta County Superior Court
2 Case No. 23CV-0202247. I was previously approved at an hourly rate of \$850.00 by various courts
3 in a number of matters, including most recently in *Audycki v. Stanford Health Care*, Santa Clara
4 Superior Court Case No. 19CV347173 and *Palomino v. Northrop Grumman Systems Corporation*,
5 Santa Clara Superior Court Case No. 19CV345534.

6 10. The total lodestar for my hours is expected to be approximately \$16,920 (18.8 hours
7 x \$900).

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

10 Executed on this 9th day of September 2026, at Los Angeles, California.

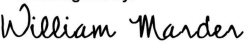
11 DocuSigned by:

0CED7A9289884D2...
12 William L. Marder

EXHIBIT A

Zavala v. Montecito Retirement Association
William L. Marder Time and Task Chart

Hours	Description of Work
9.2	Perform client intake and interview; analyze and review documents provided by client upon receipt; confer with co-counsel re anticipated claims and discuss same with client.
1.1	Review complaint and PAGA Letter; confer with client and co-counsel re same.
2.2	Confer with client re prospect of mediation and obtain additional background information concerning claims and relevant data to prepare for mediation; advise re timeline for potential settlement if case resolves at mediation.
3.5	Advise client re results of mediation and discuss settlement documentation with them; Review/revise settlement agreement and address with client.
1.0	Review and revise motion in support of approval and supporting documents; confer with client re declarations ISO same.
18.8	TOTAL HOURS