

Larry W. Lee (State Bar No. 228175)
lwlee@diversitylaw.com
Max W. Gavron (State Bar No. 291697)
mgavron@diversitylaw.com
DIVERSITY LAW GROUP, P.C.
515 S. Figueroa Street, Suite 1250
Los Angeles, CA 90071
(213) 488-6555
(213) 488-6554 facsimile

William L. Marder (SBN 170131)
bill@polarislawgroup.com
POLARIS LAW GROUP
501 San Benito Street, Suite 200
Hollister, CA 95023
Telephone: (831) 531-4214
Facsimile: (831) 634-0333

Attorneys for Plaintiffs and the Class

[Additional Counsel Information on Next Page]

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF STANISLAUS

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

Plaintiffs,

vs.

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

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 PRELIMINARY
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

(Filed concurrently with Supporting
Declarations and [Proposed] Order)

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

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

1 **JUSTICE FOR WORKERS, P.C.**

William C. Sung, SB# 280792

2 E-Mail: william@justiceforworkers.com

Tiffany L. Luu, SB# 335127

3 E-Mail: tluu@justiceforworkers.com

Joseph C. Ramli, SB# 339491

4 E-Mail: jramli@justiceforworkers.com

9575 Bolsa Avenue

5 Westminster, CA 92683

Tel: 323-922-2000

6 Fax: 323-922-2000

7 Blake R. Jones (SBN 211221)

blake@blakejones.law

8 **BLAKE JONES LAW, PC**

355 South Grand Avenue

9 Suite 2450 - #2052

Los Angeles, CA 90071

10 Tel: (323) 576-3221

11 Attorneys for Plaintiffs and the Class

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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 December 8, 2025 at Hollister, California.

William L. Marsh

William L. Marder