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Attorneys for Plaintiff and the Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF MONTEREY**

CHRISTIE MINES, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

SOUTHERN MONTEREY COUNTY
MEMORIAL HOSPITAL, a California
nonprofit corporation; and DOES 1
through 50, inclusive,

Defendants.

Case No.: 24CV005289

Assigned to the Honorable Thoman W. Wills, Dept.
15)

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

Date: April 10, 2026

Time: 8:30 A.M.

Dept.: 15

Action Filed: December 12, 2024

Trial Date: Not Set

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I, William L. Marder, hereby declare and state as follows:

1. I am an attorney at law duly admitted to practice before all courts in the State of
 nia and am a partner of the law firm of the Polaris Law Group, one of the attorneys of
 for Plaintiff Christie Mines (“Plaintiff”), in the above-entitled action. I have personal
 edge of the matters set forth herein, and if called upon as a witness to testify thereto, I
 and would competently do so.

2. The proposed settlement meets the criteria for this Court to grant final approval of the settlement on a class-wide basis, as the settlement is fair, adequate, and reasonable.

3. The Joint Stipulation of Class and PAGA Settlement (“Stipulation” or “Settlement”) was the product of negotiations between highly able and experienced attorneys on both sides who possessed the relevant data and extensive legal research which they had carefully reviewed. The Parties engaged in arm’s length negotiations, resulting in the settlement.

4. I have spent significant time researching and pursuing the claims that have been asserted in this action. Based on my independent investigations and evaluations, I am of the opinion that the proposed settlement is fair, reasonable, and adequate, and is in the best interests of the Settlement Class, in light of all known facts and circumstances, and the expenses and risks of continued litigation. The settlement was negotiated at arm's length. Thus, this settlement should be granted final approval.

5. Any remaining monies from uncashed settlement checks will be distributed to the recipient Legal Aid at Work, in accordance with Code of Civil Procedure § 384. I do not have any relationship with or connection to said organization.

6. From the inception of the case, Class Counsel have zealously represented the interests of the Settlement Class. Class Counsel have engaged in significant discussions with Plaintiff's counsel to obtain informal data and documents and to discuss the merits of the case on behalf of the Settlement Class. This settlement was obtained for the benefit of the Settlement Class, as opposed to the individual Class Representative.

1 7. I was retained based upon a contingency fee arrangement wherein Plaintiff's
2 counsel agreed to advance all costs and receive no fee unless a recovery was accomplished.
3 Specifically, had Plaintiff failed to prevail in the case, counsel for Plaintiff would have spent a
4 significant amount of time, money, and other resources without any benefit or return. In addition,
5 had Plaintiff also failed to prevail in the present case, Defendant would have been able to seek
6 costs in connection with its defense of the case.

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

11 9. I have defended large institutional employers in employment cases. From 1995-
12 1997, as an associate at Bolling, Walter & Gawthrop in Sacramento, I represented the City of
13 Sacramento, Yolo County, the City of Davis, Solano County, and other employers in
14 employment litigation in state and federal courts.

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

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

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

22 13. I have been the sole trial attorney in two jury trials in which I represented a
23 plaintiff who prevailed on wrongful termination claims brought pursuant to the California Fair
24 Employment & Housing Act, California Government § 12900 *et seq.* These three cases are:
25 *Gamayo v. Drobny Law Offices*, Sacramento Superior Court Case No.: 34-2008-00005372CU;
26 and *Cherub Berlanga v. Willow Grove School District*, San Benito County Superior Case No.:
27 CU-09-00100.
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1 14. I have been the sole trial attorney in two court trials in which I represented
2 plaintiffs who prevailed on wage and hour claims. These cases are *Smith v. Joyce*, Monterey
3 County Superior Court Case No.: M74334; and *Nava v. Rodriguez*, San Benito County Superior
4 Court Case No.: CU-08-00022.

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

8 16. My co-counsel and I will adequately represent the Class Members in this action.
9 Plaintiff's counsel have and will zealously represent Plaintiff and the Settlement Class and
10 pursue this lawsuit to its conclusion. I have no conflicts with the Settlement Class and will
11 adequately represent the Settlement Class.

12 17. To date, I have incurred approximately 24.5 hours in the prosecution of this
13 matter. Attached as **Exhibit A** is a summary of my hours and tasks on this matter.

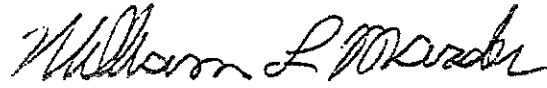
14 18. My current billing rate is \$900.00 per hour. I have been approved at an hourly rate
15 of \$900.00 per hour in *Bendorf v. Sea World LLC*, San Diego County Superior Court Case No.
16 37-2021-00034922-CU-OE-CTL and *Middlebrooks v. FleetPride, Inc.*, Shasta County Superior
17 Court Case No. 23CV-0202247. I have also been approved at an hourly rate of \$800.00 per hour
18 in *Martinez and Acosta v. City of Hope National Medical Center, et al.*, San Bernardino County
19 Superior Court Case No. CIVDS2015729, *Jaime Moen v. Genentech, Inc.*, San Diego County
20 Superior Court Case No. 37-2021-00008619-CU-OE-CTL, *Murray v. Granite Wellness Centers*
21 *et al.*, Nevada County Superior Court Case No. CU20-084680, and *Smith, et al. v. Clean*
22 *Harbors Environmental Services, Inc.*, Sacramento County Superior Court Case No. 34-2021-
23 00292526.

24 19. Although I believe \$900.00 per hour is a reasonable rate for my services, as it has
25 been approved throughout California, in this motion, I request a reduced hourly rate of \$595.00,
26 which considers the jurisdiction where this Action was litigated. Accordingly, the total lodestar
27 for my hours will be approximately \$14,577.50 based on an hourly rate of \$595.00 per hour
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1 [24.5 hours x \$595.00 per hour].

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

4 Executed on this 12 day of March 2026, at Hollister, California.

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6 William L. Marder
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EXHIBIT A

Mines v. Southern Monterey County Memorial Hospital
(Monterey County Case No. 24CV005289)
William L. Marder Time and Task Chart

Hours	Description of Work
11.8	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.
1.9	Analyze and review pleadings from prior action filed against Defendant to evaluate viability of current claims.
1.4	Confer with client re discovery served by Defendant and notice of deposition; address anticipated progress through case.
3.1	Confer with client re proposed settlement discussions; discuss data and further questions with client in advance of settlement negotiations.
4.4	Confer with client and co-counsel re proposed settlement; analyze, review, and further revise settlement agreement and supporting documents.
1.9	Draft and revise documentation in support of approval motions for settlement.
24.5	TOTAL HOURS