

JAMIE SERB, CA Bar No. 289601
jamie@crosnerlegal.com
NIKKI TRENNER, CA Bar No. 316007
nikki@crosnerlegal.com
ZACHARY CROSNER, CA Bar No. 272295
zach@crosnerlegal.com
CROSNER LEGAL, PC
9440 Santa Monica Boulevard, Suite 301
Beverly Hills, California 90210
Telephone: (866) 276-7637
Facsimile: (310) 510-6429

Attorneys for Plaintiff CINDY GALLOWAY

James R. Hawkins (SBN 192925)
Christina M. Lucio (SBN 253677)
Mitchell J. Murray (SBN 285691)
JAMES HAWKINS APLC
9880 Research Drive, Suite 200
Irvine, California 92618
Telephone: (949) 387-7200
james@Jameshawkinsaplc.com
christina@Jameshawkinsaplc.com
mitchell@Jameshawkinsaplc.com

Attorneys for Plaintiffs KYLE COOKSON and EDGAR VILLALOBOS,
on behalf of themselves and all others similarly situated

SUPERIOR COURT OF CALIFORNIA

COUNTY OF LOS ANGELES

CINDY GALLOWAY, as an individual and on
all others similarly situated and aggrieved,
Plaintiff,
vs.
P.F. CHANG'S III, LLC, an Arizona limited
liability company; P.F. CHANG'S CHINA
BISTRO, INC., a Delaware Corporation; PEI
WEI ASIAN DINER, LLC, a Delaware limited
liability company; and DOES 1 to 100,
inclusive,
Defendants.

Case No. 20STCV36407

*[Assigned for all purposes to the Honorable
Maureen Duffy-Lewis, Dept. 38]*

**DECLARATION OF JAMES R. HAWKINS
IN SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF JOINT
STIPULATION OF CLASS ACTION AND
PAGA SETTLEMENT AND AWARD OF
ATTORNEYS' FEES, COSTS, AND CLASS
REPRESENTATIVE SERVICE AWARD**

Date: November 3, 2025
Time: 9:30 a.m.
Dept.: 38
Reservation Id: 600675110415

1 I, James R. Hawkins, declare as follows:

2 1. I am an individual over the age of 18. I am a principal to the law firm of James
3 Hawkins, APLC. I am one of the attorneys of record for Plaintiffs. I have personal knowledge of
4 the facts set forth below, and if called to testify regarding them, I could and would do so
5 competently.

6 2. I submit this Declaration in support of Plaintiffs' Motion for Final Approval of
7 Class Action and PAGA Settlement and Award of Attorneys' Fees, Costs, and Class
8 Representative Service Award (the "Final Approval Motion").

9 3. I have no knowledge of the existence of any conflicting interests between my firm
10 and any of its attorneys, my co-counsel's firms or any of their attorneys, and Plaintiffs or any other
11 Class Member.

12 4. As more fully detailed in my declaration of preliminary approval, the
13 accompanying declarations and attachments concurrently submitted herewith, the Settlement is a
14 fair, adequate, and reasonable compromise of the claims at issue. I endorse the Settlement as it is
15 in the best interests of Plaintiffs and the Class.

16 CLASS COUNSEL'S EXPERIENCE

17 5. I have a great deal of experience in wage and hour class action litigation. I have
18 been certified and approved as class counsel in many other wage/hour class actions, and I am
19 currently litigating numerous others before this Court and others. Although not an all-inclusive
20 list, over the years I have prosecuted the following class action matters as lead and/or co-lead
21 counsel, all of which implicated similar law and facts to those associated with this Action:

22 a. ***Mojica v. Compass Group, Inc., et. al.*** USDC Central District, Case No. 8:13-cv-01754.
23 Wage and Hour Class Action case seeking past wages for meal and rest break violations for
24 production workers in the State of California. Plaintiffs' Counsel preliminarily appointed as
25 Class Counsel. Case settled. Final approval granted, and funds fully disbursed.

26 b. ***Dao v. 3M Company, et al.*** USDC, CENTRAL DISTRICT, Case No. CV-08-04554.
27 Wage and Hour Class Action case seeking past wages for "off the clock," overtime and meal
28 and rest break violations for production workers in the State of California. Plaintiffs' Counsel

1 appointed as Lead Counsel. Case settled, Final Approval granted, no objections and funds fully
2 distributed.

3 c. ***Ortiz v. Kmart***, USDC, CENTRAL DISTRICT, Case No. SACV 06-638 ODW. Wage
4 and Hour Class Action case seeking past wages for meal and rest period violations for retail
5 employees in the State of California. Plaintiffs' counsel appointed co-lead counsel. Case settled,
6 Final Approval granted, no objections and funds fully distributed.

7 d. ***Morgan v. Aramark Campus, LLC***, USDC, CENTRAL DISTRICT, Case No. SACV08-
8 00412. Wage and Hour Class Action case seeking past wages for meal and rest period violations
9 for retail employees in the State of California. Plaintiffs' Counsel appointed as Lead Counsel.
10 Case settled, Final Approval granted, no objections and funds fully distributed.

11 e. ***West v Iron Mountain Information Management, Inc, et. al.***; Los Angeles County
12 Superior Court, Case No. BC393709. Wage and Hour Class Action seeking past wages for
13 overtime, meal, and rest break violations for driver employees in the State of California.
14 Stipulation for "binding arbitration." Arbitration Award for Plaintiffs Class. Arbitration Award
15 confirmed. Plaintiffs' counsel lead trial counsel and class counsel.

16 f. ***Gonzalez v. Superior Industries International, Inc., et al.***, Los Angeles County Superior
17 Court, Case No. BC 357912. Wage and Hour Class Action seeking past wages for overtime,
18 meal, and rest breaks violations for production employees in the State of California. Plaintiffs'
19 counsel appointed as lead counsel. Case settled, Final Approval granted, no objections and
20 funds fully distributed.

21 g. ***Acosta v. Fleetwood Travel Trailers of California, Inc., et al.***, Riverside County
22 Superior Court, Case No. RIC 440630. Wage and Hour Class Action seeking past wages for
23 overtime, meal, and rest break violations for production employees in the State of California.
24 Plaintiffs' counsel appointed as co-lead counsel. Case settled, Final Approval granted, no
25 objections and funds fully distributed.

26 h. ***Walker v. Sharkeez, et al.***, Orange County Superior Court, Case No. 05CC00293. Wage
27 and Hour Class Action seeking past wages for unlawful deductions, meal, and rest break
28

violations for restaurant employees in the State of California. Plaintiffs' counsel appointed as lead counsel. Case settled. Final Approval granted and funds fully distributed.

i. ***Padron v. Universal Protection Service, et al.***, Orange County Superior Court, Case No. 05CC00013. Wage and Hour Class Action seeking past wages for overtime, meal, and rest break violations for security officers in the State of California. Plaintiffs' counsel appointed as co-lead counsel. Case settled, Final Approval granted, no objections and funds fully distributed.

j. ***Martinez v. Securitas Security Services USA, et al.***, Santa Clara Superior Court, Case No. 105-CV047499, et al. J.C.C.P. No. 4460. Wage and Hour Class Action seeking past wages for meal and rest break violations for security officers employed by Defendants in the State of California. Plaintiffs' counsel and co-counsel. Case settled, Final Approval granted and funds fully distributed.

k. ***Velasquez-Lopez v. Hotel Cleaning Services, Inc. et al.***, Riverside Superior Court, Case No. RIC 420909. Wage and Hour Class Action seeking past wages for overtime, meal and rest break violations for housekeepers employed by Defendants in the State of California. Plaintiffs' counsel appointed as lead counsel. Case settled, Final Approval granted, no objections and funds fully distributed.

l. ***Ruiz, et al. v. Unisource Worldwide, Inc., et al.***, USDC, CENTRAL DISTRICT, Case No. CV09-05848. Wage and Hour Class Action seeking past wages for meal and rest period violations for non-exempt employees employed by Defendants in the state of California. Case settled. Awaiting Preliminary Approval hearing. Plaintiffs have petitioned the Court for Lead Counsel.

m. ***Herrador v. Culligan International Company, et al.***, USDC, CENTRAL DISTRICT, Case No. SACV 08-680. Wage and Hour Class Action seeking past wages for field and branch employees of Defendants in the State of California. Plaintiffs' counsel appointed as lead counsel. Case settled and awaiting Final Approval.

n. ***Defries v. Domain Restaurants, et al.***, Orange County Superior Court, Case No. 05CC00128. Wage and Hour Class Action seeking past wages for restaurant employees of

Defendants in the State of California. Plaintiffs' counsel appointed as lead counsel. Case settled, Final Approval granted, no objections and funds fully distributed.

o. ***Denton v. BLB Enterprises, Inc., et al.***, Orange County Superior Court, Case No. 07CC01292. Wage and Hour Class Action seeking unpaid overtime, meal and rest break violations for security guards employed by Defendants in the State of California. Plaintiffs' counsel appointed as lead counsel. Case settled, Final Approval granted, no objections and funds fully distributed.

p. ***Rios v. Sandberg Furniture Manufacturing Co., Inc, et al.***, Los Angeles Superior Court, Case No. BC411477. Wage and Hour Class Action seeking unpaid meal and rest break violations for production employees employed by Defendants in the State of California. Plaintiff's counsel appointed as lead counsel. Case settled, Final Approval granted, no objections and funds fully distributed.

q. ***McMurray v. Dave and Busters, Inc., et al.***, Orange County Superior Court, Case No. 06CC00099. Wage and Hour Class Action seeking past wages for meal and rest break violations for restaurant employees employed by Defendants in the State of California. Plaintiffs' counsel appointed as co-lead counsel. Case settled, Final Approval granted, no objections and funds fully distributed.

r. ***Osuna v. DFG Restaurants, Inc., et al.***, Los Angeles Superior Court, Case No. BC 330145. Wage and Hour Class Action seeking past wages of overtime for misclassification of managers employed by Defendant, DBA Carl's Jrs. in the State of California. Plaintiffs' counsel appointed as co-lead counsel. Case settled, Final Approval granted, no objections and funds fully distributed.

s. ***Burns v. Gymboree Operations, Inc., et al.***, San Francisco Superior Court, Case No. CGC-07-461612. Wage and Hour Class Action seeking past wages for meal and rest break violations for retail employees employed by Defendants in the State of California. Plaintiffs' counsel appointed lead counsel. Case settled, Final Approval granted, no objections and funds fully distributed.

1 t. ***Willems v. Diedrich Coffee, Inc., et al.***, Orange County Superior Court, Case No.
2 07CC00015. Wage and Hour Class Action seeking past wages of overtime for misclassification
3 of managers employed by Defendants in the State of California. Plaintiffs' counsel appointed
4 lead counsel. Case settled, Final Approval granted, no objections and funds fully distributed.

5 u. ***Davila, et al. v. Beckman Coulter, Inc., et al.***, Orange County Superior Court, Case No.
6 07CC01347. Wage and Hour Class Action seeking past wages for overtime, meal and rest break
7 violations for production workers employed by Defendants in the State of California. Plaintiffs'
8 counsel appointed lead counsel. Case settled, Final Approval granted, no objections and funds
9 fully distributed.

10 v. ***Perez v. Naked Juice Company of Glendora, Inc.***, Los Angeles Superior Court, Case
11 No. BC387088. Wage and Hour Class Action seeking past wages for overtime, meal and rest
12 period violations for production employees employed by Defendants in the State of California.
13 Plaintiff's counsel appointed as lead counsel. Case settled. Final Approval granted, no
14 objections and funds fully distributed.

15 w. ***Coordination Proceeding Special Title [Rule 1550(b)] Wackenhut Wage and Hour***
16 ***Cases***, Los Angeles Superior Court, Case No. JCCP 4545. Wage and Hour Class Action seeking
17 past wages for overtime, meal and rest period violations for security guards employed by
18 Defendants in the State of California. Certification granted. Plaintiffs' counsel appointed as co-
19 lead counsel. Writ taken. Court stays action pending Appellate Court ruling. Court lifts stay.

20 x. ***Placencia v. Amcor Packaging Distribution, Inc.***, Orange County Superior Court, Case
21 No. 30-2013-00694012-CU-OE-CXC. Wage and Hour Class Action seeking past wages for
22 overtime, meal and rest period violations, and penalties on behalf of non-exempt production,
23 maintenance, shipping, and receiving employees employed by Defendants in California.
24 Plaintiff's counsel appointed as lead counsel. Case settled. Final Approval granted, no
25 objections and funds fully distributed.

26 y. ***Trani v. Lisi Aerospace, et al.***, Los Angeles Superior Court, Case No. BC495527. Wage
27 and Hour Class Action seeking past wages for overtime, meal and rest period violations, and
28 penalties on behalf of non-exempt manufacturing employees employed by Defendants in

1 California. Plaintiff's counsel appointed as lead counsel. Case settled. Final Approval granted,
2 no objections and funds fully distributed.

3 z. **Galvan v. Goodwin Co.**, Orange County Superior Court, Case No. 30-2013-00637062-
4 CU-OE-CXC, Wage and Hour Class Action seeking past wages for meal period violations, and
5 non-compliant wage statements on behalf of non-exempt production employees employed by
6 Defendants in California. Plaintiff's counsel appointed as lead counsel. Case settled. Final
7 Approval granted, no objections and funds fully distributed.

8 aa. **Reyes v. Bristol Fiberlite**, Orange County Superior Court, Case No. 30-2013-00653425-
9 CU-OE-CXC. Wage and Hour Class Action seeking past wages for overtime, meal and rest
10 period violations, inaccurate wage statements, and penalties on behalf of non-exempt employees
11 employed by Defendants in California. Plaintiff's counsel appointed as lead counsel. Case
12 settled. Final Approval granted, no objections and distribution of funds pending.

13 bb. **Gutierrez v. HMT Tank, USDC Central Dist.**, Case No. CV14-1967-CAS(MAN)
14 Wage and Hour Class Action seeking past wages for meal and rest period violations, failure to
15 indemnify necessary expenses, inaccurate wage statements, and penalties on behalf of non-
16 exempt employees working in positions related to servicing, refabricating, and repairing storage
17 tanks employed by Defendants in California. Plaintiff's counsel appointed as lead counsel. Case
18 settled. Final Approval granted, no objections and funds fully distributed.

19 cc. **Williams v. Il Fornaio America Corp.**, Sacramento County, Case No. 34-2011-
20 0009616. Wage and Hour Class Action seeking past wages for overtime, meal and rest period
21 violations, reimbursements, and penalties on behalf of non-exempt restaurant employees
22 employed by Defendants in California. Plaintiff's counsel appointed as lead counsel. Case
23 settled. Final Approval granted, and funds fully distributed.

24 dd. **Aguilar v. 7-Eleven, Inc.**, Orange County, Case No. 30-2009-002687141-CU-OE-CXC.
25 Wage and Hour Class Action seeking past wages for overtime, meal and rest period violations,
26 and penalties on behalf of non-exempt retail clerks employed by Defendants in California.
27 Plaintiff's counsel appointed as lead counsel. Case settled. Final Approval granted, no
28 objections and funds fully distributed.

1 *ee. Madrigal v. Huntington Beach Market Broiler, Inc.*, Orange County, Case No. 30-
2 2012-00611260. Wage and Hour Class Action seeking past wages for overtime, meal and rest
3 period violations, reimbursements, and penalties on behalf of non-exempt employees employed
4 by Defendants in California. Plaintiff's counsel appointed as lead counsel. Case settled. Final
5 Approval granted, no objections and funds fully distributed.

6 *ff. Vang v. Jazz Semiconductor, Inc.*, Orange County, Case no. 30-2011-00460278. Wage
7 and Hour Class Action seeking past wages for overtime, meal and rest period violations,
8 reimbursements, and penalties on behalf of non-exempt production workers employed by
9 Defendants in California. Plaintiff's counsel appointed as lead counsel. Case settled. Final
10 Approval granted, no objections and funds fully distributed.

11 gg. *Cano v. Financial Statement Services, Inc.*, Orange County, Case No. 30-2013-
12 00653349-CU-OE-CXC.

13 hh. *Gonzalez v. Quality Aluminum Force, LLC*, Orange County, Case No. 30-2015-
14 00817941-CU-OE-CXC.

15 ii. *Smith v. Space Exploration Technologies Corp.*, Los Angeles County Case No.
16 BC554258.

17 jj. *Madrigal v. Balda C Brewer, Inc.*, Orange County Case No. 30-2015-00820218-
18 CU-OE-CXC.

19 kk. *Mendez v. Liberty Glass Fabricators, Inc.*, Riverside County Case No. RIC
20 1800119.

21 ll. *Attia v. Neiman Marcus Group, Inc.*, United States District Court for the Central
22 District of California Case No. 8:16-cv-001504-DOC-FFM

23 mm. *Vigueras v. Red Robin*, United States District Court for the Central District of
24 California Case No. 8:17-cv-1422-JVS-DFM.

25 nn. *Payne v. Marriott Ownership Resorts, Inc.*, San Diego County Case No. 37-
26 2018-00015175-CU-OE-CTL.

27 6. Our firm has served as class counsel in a number of significant wage and hour
28 settlements. Of particular note, in 2019, our firm was co-lead counsel in securing one of the largest
wage and hour class action settlement in California history at \$130 million. This case involved

1 several appeal, including plaintiffs appeal of a decertification order. The appeal amassed an
2 extensive appellate record comprising a 23-volume joint appendix, a three-volume reporters'
3 transcript, five briefs, four letter briefs, two motions for judicial notice, a motion to augment the
4 record, and several additional letters informing the appellate court of new legal authority issued
5 after *Dukes*. The matter was argued to and submitted by the Court of Appeal on September 15,
6 2016, and on November 21, 2016, the decertification order was reversed, and the case was
7 remanded for further proceedings. (*Lubin v. The Wackenhut Corporation* ("Lubin"), 5 Cal. App.
8 5th 960 (2016)). Wackenhut filed a petition for review of the Court of Appeal decision to the
9 California Supreme Court. The Supreme Court denied Wackenhut's petition for review of *Lubin*.
10 The Court of Appeal issued remittitur on April 10, 2017. Eventually, through more litigation, the
11 parties were able to secure the \$130 million settlement that was approved on October 21, 2019,
12 by Judge Highberger in the Los Angeles Superior Court.

13 7. Additionally, in early 2020, our firm served as lead class counsel in a class action
14 jury trial in the Central District of California involving the class and PAGA representative claims
15 of over 23,000 employees which successfully resolved in the midst of trial for \$8,500,000.

16 8. Our firm has settled many high-stakes class and representative actions. Our firm's
17 settlements have directly compensated hundreds of thousands of California workers. Our firm's
18 actions have also forced employers to modify their policies for the benefit of employees including
19 changing the compensation structure for certain employees and changing practices to ensure that
20 workers will be able to take timely rest and meal breaks and receive proper compensation for their
21 work. As leader in prosecuting class and PAGA enforcement actions, our firm has secured
22 millions of dollars for workers and in civil penalties for the State of California.

23 9. Based on our experience, demonstrated competence, resources to prosecute the
24 claims at issue and reputation among our colleagues in the both the defense and plaintiffs' bar, I
25 respectfully submit our firm's experience in the field of wage and hour cases provides us the
26 ability to prosecute claims swiftly and often times without the need for protracted litigation as
27 here. Although, as demonstrated in the *Wackenhut* cases, we do not give up fighting for class
28 members when challenged and necessary. As such, we respectfully subject that we are adequate

1 Class Counsel.

2 10. In sum, my firm has been the lead or co-lead counsel in hundreds of cases since its
3 inception. We have recovered hundreds of millions of dollars for employees in the State of
4 California and millions for the State as well through PAGA.

5 11. As set forth in my preliminary approval declaration and based upon the
6 overwhelmingly positive response from the Class, it continues to be my opinion that this
7 Settlement is fair, reasonable, and adequate, and in the best interest of the Class. The Settlement
8 is a good result by any measure, particularly so considering Defendants' formidable arguments
9 against liability and damages. In light of these issues, and the fact that the Settlement was the
10 product of protracted, contentious, and arm's-length negotiations between highly experienced
11 counsel with the assistance of a well-respected neutral third-party mediator, I believe that the
12 Settlement should be granted final approved.

13 **CLASS COUNSEL FEES AND LITIGATION EXPENSES PAYMENT**

14 12. Class Counsel seeks an award of \$1,333,333.33 in attorneys' fees, which
15 represents one-third of the Gross Settlement Amount. (Settlement Agreement, ¶ 6.D.(4).)
16 Given the extensive efforts of counsel, one-third of the Gross Settlement Amount is respectfully
17 believed to be a reasonable award. Class Counsel has borne the entire risk and cost of this
18 litigation on a pure contingency basis. The legal issues raised in this case were complex and
19 drew significantly upon the experience of Class Counsel. The proposed attorneys' fees
20 accurately reflect the legal marketplace and are within the range of customarily approved fees
21 by California courts.

22 13. Despite the complexity of the case, Class Counsel has, through our investment of
23 substantial effort and resources, secured an outstanding settlement on behalf of the Class
24 Members. The issues and arguments Class Counsel has encountered and overcome in arriving at
25 the parties' negotiated settlement terms were also many and complex and required skillful
26 advocacy that can arise only out of experience, professional perspective, and success. Plaintiffs
27 would have faced substantial legal and factual obstacles in demonstrating that Class certification
28 was appropriate and that they would prevail on the merits in light of Defendants' asserted

1 defenses. Still, Class Counsel has negotiated a substantial settlement on behalf of the Class for
2 such claims. Plaintiffs would have also been required to establish a significant amount of
3 witness testimony, pattern and practice evidence, statistical evidence, sampling evidence, expert
4 testimony, and other evidence in order to evaluate and present arguments at both class
5 certification and trial. Defendant has vigorously challenged the claims pled in the operative
6 complaint, contested liability, the amount of claimed damages, and the propriety of Class
7 Certification, and would have continued to do so through trial. Accordingly, Class Counsel
8 believes the Settlement to be fair, reasonable, and adequate and that it is in the best interest of
9 the Class Members. The fairness and adequacy of the Settlement is confirmed by all known
10 facts and circumstances, including the risk of significant delay and uncertainty associated with
11 litigation, the various defenses asserted by Defendant, and numerous potential appellate issues.

12 14. Class Counsel respectfully submit the fees and costs provision of the Settlement
13 is fair and reasonable both when cross-checked under the lodestar and common fund method.
14 The total billable hours that our firm (and our co-counsel's firms) has invested and will invest in
15 prosecuting this action and the related actions which gave rise to the Settlement, should this
16 Court approve the settlement, is substantial. I respectfully submit that our fees and costs request
17 are fair and reasonable because our office has expended substantial time and effort in achieving
18 the proposed Settlement.

19 15. I submit that the requested attorneys' fees of one-third the Gross Settlement
20 Amount that Class Counsel has obtained on behalf of the Class Members is fair and reasonable,
21 as are the hourly rates at which our attorneys bill.

22 16. I am the founding partner at James Hawkins, APLC and have devoted
23 approximately 65.1 hours in prosecuting this case on behalf of Plaintiffs and the Class. In 1993,
24 I graduated from the University of California, Los Angeles with a Bachelor of Arts Degree.
25 Following graduation, I attended Whittier Law School. In 1996, while a full-time law student, I
26 was also a full-time Judicial Extern for the Honorable Consuelo B. Marshall, United States
27 District Court, Central District. After approximately five months of service for Judge Marshall,
28 I became a full-time extern for the United States Attorney's Office, Central District of

1 California. My externship lasted for approximately five months. Thereafter, in 1997, I
2 graduated from Whittier Law School. The same year, I was admitted to practice law in the State
3 of California. Since its inception, this law firm has been exclusively involved in class action
4 and complex litigation. In 2009, I opened an additional office in Miami, Florida, prosecuting
5 wage and hour class actions. Since 2002, I have been lead counsel or co-lead counsel in
6 hundreds of wage and hour class actions. My hourly rate is \$1,050.00 per hour.

7 17. The following is a summary of my tasks and activities in prosecuting this matter:
8 review intake and client documents; legal and factual research; extensive investigation and
9 document review in connection with the filing of the complaint; research regarding prior
10 actions; strategy regarding various actions; strategy with attorneys; research regarding potential
11 remand motion; reviewing and revising opposition to motion to compel arbitration; reviewing
12 informal discovery; mediation preparation; conferences with expert; conferences regarding
13 damages model and settlement; conferences with co-counsel regarding consolidation; reviewing
14 settlement-related documentation including amended complaint; reviewing motion for
15 preliminary approval including declaration; and reviewing motion for final approval including
16 declaration.

17 18. Christina Lucio is Of Counsel to James Hawkins, APLC and has devoted
18 approximately 78.30 hours in prosecuting the action. Ms. Lucio graduated from the University
19 of California, Riverside in 2003 and received her law degree from the University of Southern
20 California in 2007. She has been a member of the State Bar of California since 2007. Her
21 practice focuses primarily on representative and class actions, including wage and hour
22 litigation. Ms. Lucio's hourly rate is currently \$775 per hour. The following is a summary of
23 Ms. Lucio's tasks and activities in prosecuting this matter: review summary issues; reviewing
24 client documentation; telephone calls with clients regarding claims; draft class complaint; draft
25 PAGA notice; draft first amended complaint; conferences regarding strategy; review removal
26 documents; legal research and strategy regarding motion for remand; research regarding related
27 cases; conferences with co-counsel; conferences with defense counsel; mediation preparation;
28 attending mediation; reviewing and revising the memorandum of understanding; reviewing and
revising the settlement agreement; review motion for preliminary approval and related

documents; supervising administration process; respond to class member inquiries; and reviewing and revising motion for final approval.

19. Mitchell Murray is Of Counsel to James Hawkins, APLC. Mr. Murray is a 2007 graduate of the University of California, San Diego and 2012 graduate of California Western School of Law. He was admitted to the State Bar of California in 2012. He is a member of the Consumers Attorneys of San Diego. He was selected as a “Rising Star” in 2019, 2021, and 2022 by Super Lawyers Magazine. Mr. Murray’s legal experience has focused primarily on all areas of employment law. Since 2016, he has focused his practice in the area of wage and hour class action. Mr. Murray has dedicated 106.80 hours in prosecuting this action. Such hours are reasonable and necessary. The following is a summary of Mr. Murray’s tasks and activities in prosecuting this matter: conferences and correspondence with co-counsel and defense counsel; conferences with clients; review complaints in related cases; review and revise opposition to motion to compel arbitration; attend hearing on motion to compel arbitration; mediation preparation; research regarding factual and legal issues; drafting mediation brief; attending mediation; reviewing and revising the MOU; reviewing and revising settlement agreement and related documents; reviewing and revising amended consolidated complaint; obtaining proposals from settlement administrators; drafting stipulation to stay federal class action pending settlement; draft status report in federal class action; reviewing and revising motion for preliminary approval; draft ex parte application to re-set hearing on motion for final approval; monitoring settlement administration; responding to class member inquiries; correspondence with settlement administrator; reviewing and revising motion for final approval. Mr. Murray's hourly rate is \$725.00 per hour.

20. Paul A. Brown is a former Associate of our firm. Mr. Brown earned his undergraduate degree from New York University in 2014 before graduating from the University of San Francisco School of Law in 2021. Mr. Brown was admitted to the California Bar in November 2021. His hourly rate is \$450.00 per hour and he spent approximately 37.50 hours on this case. The following is a summary of his tasks and activities in prosecuting this matter: draft opposition to motion to compel arbitration; attend hearing on motion to compel arbitration;

1 assist with preparation for mediation; attend mediation; assist with settlement related
2 documents.

3 21. Melissa Whitson is as a paralegal at my firm and she meets the requirements of
4 Business & Professions Code section 6450 et seq. Ms. Whitson holds a B.A. in Liberal Studies
5 from California State University Fullerton. Ms. Whitson has been a paralegal in the employment
6 law field for more than 20 years. Ms. Whitson's hourly billing rate and hours worked 28.30 are
7 reasonable and usual for the services rendered.

8 22. The number of hours James Hawkins, APLC has spent working on this litigation
9 was necessary and reasonable in pursuit of the Settlement. The lodestar for James Hawkins
10 APLC is approximately **\$225,568.60**. This is exclusive of the additional amounts incurred by
11 our co-counsel in this case. I submit that the requested attorneys' fees of one-third of the Gross
12 Settlement Amount that Class Counsel has obtained to resolve the actions is fair and reasonable,
13 as are the hourly rates at which our attorneys bill.

14

James Hawkins APLC Lodestar Summary				
Timekeeper	Years in Practice	Hours	Rate	Total
James R. Hawkins	27	65.1	\$1050	\$68,355.00
Christina M. Lucio	17	78.3	\$775	\$60,682.50
Mitchell J. Murray	12	106.8	\$725	\$77,430.00
Paul Brown	3	37.5	\$450	\$16,875.00
Melissa Whitson (Paralegal)		28.30	\$220	\$6,226.00
TOTALS		316		\$225,568.50

15
16
17
18
19
20 23. We respectfully submit that our hourly rates are reasonable in light of the hourly
21 rates charged in the marketplace for comparable skill, years of experience and services. A true
22 and correct copy of the Wolters Kluwer Real Rate Report (the industry's leading data-driven
23 benchmark report for lawyer and paralegal rates), attached as **Exhibit 1**, and the Laffey Matrix,
24 attached as **Exhibit 2**. I believe James Hawkins, APLC's hourly rates are in line with, and, in
25 fact are modest compared with the hourly rates of other counsel in similar actions.

26 24. As set forth in my co-counsel's declaration, the Settlement achieved is a fair,
27 reasonable, and adequate resolution of the Action in light of the claims and defenses at issue.
28

1 25. The Settlement that Counsel has negotiated on behalf of the Class confronts very
2 difficult and potentially individualized issues which make trial on the merits challenging. I and
3 our firm's attorneys, along with co-counsel, have secured this Settlement through persistent
4 advocacy of the claims, which has applied legal nuances and negotiation techniques to achieve a
5 very favorable result under the circumstances. Other attorneys without our experience and
6 comprehensive knowledge and perspective in connection with complex employment litigation
7 may not have been able to achieve such superior settlement terms on behalf of the Class. I
8 believe the requested amount of attorneys' fees under the Settlement is a reasonable allocation
9 given the excellent result we have achieved. I, therefore, respectfully request the Court approve
10 the allocated attorneys' fees under the Parties' Settlement.

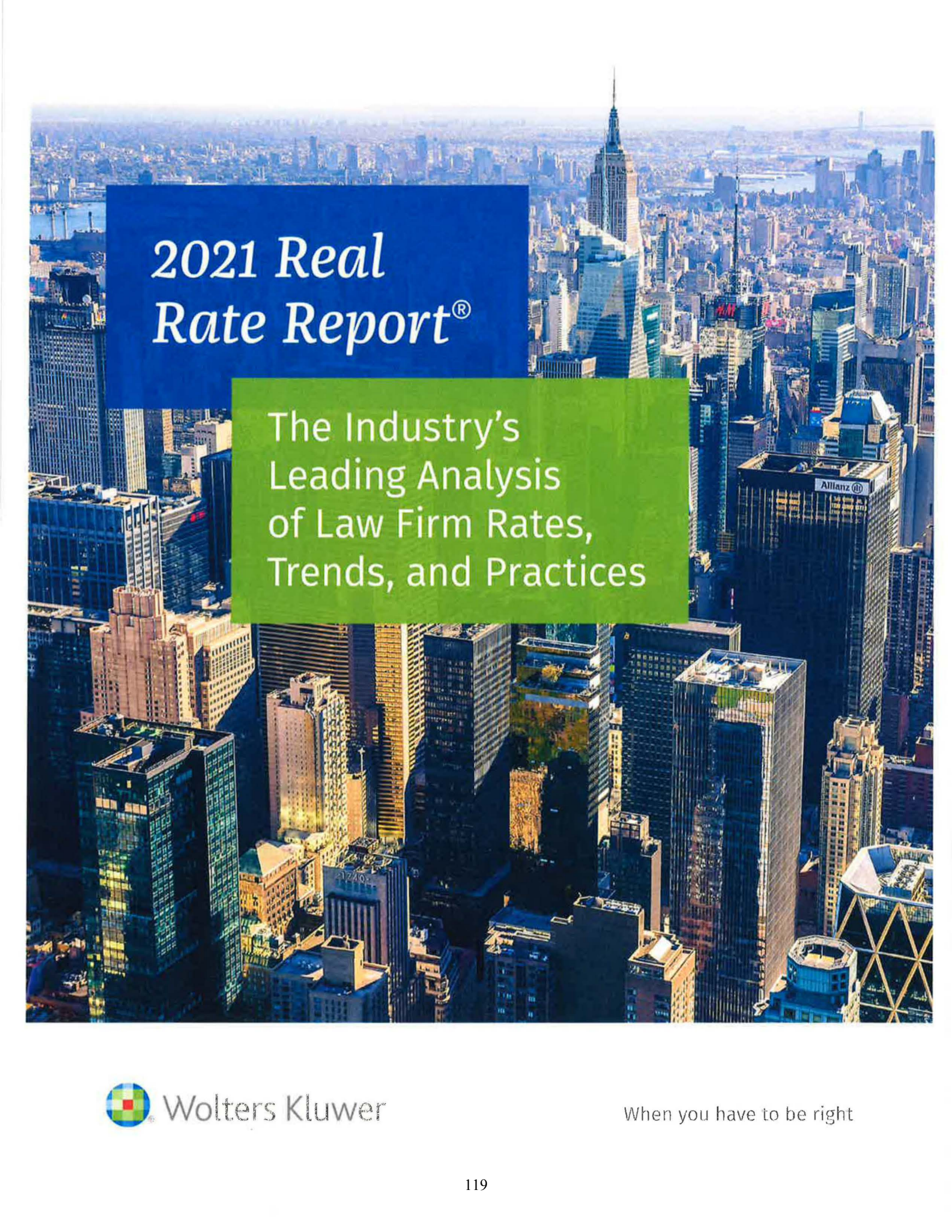
11 26. In serving as Class Counsel in this action and the related actions which ultimately
12 led to the Settlement, my firm will also seek reimbursement for the out-of-pocket costs of
13 \$15,058.37. This does not include the costs incurred by our co-counsel. A summary of the
14 costs incurred by our firm to date in this action is attached herewith as **Exhibit 3**. I believe that
15 all of these fees and costs are reasonable and necessarily incurred in litigating this matter and in
16 pursuit of the settlement.

17 I declare under penalty of perjury under the laws of the State of California that the
18 foregoing is true and correct. Executed on October 1, 2025, at Irvine, California.

19
20
21
22
23
24
25
26
27
28


James R. Hawkins

Exhibit 1



2021 Real Rate Report[®]

The Industry's
Leading Analysis
of Law Firm Rates,
Trends, and Practices

Report Editor**Jeffrey Solomon**

Senior Director, Product Management Legal Analytics, Wolters Kluwer's ELM Solutions

Lead Data Analysts**Carol Au**

Business Systems Quantitative Analyst
Wolters Kluwer's ELM Solutions

Pankaj Saha

Data Engineer
Wolters Kluwer's ELM Solutions

ELM Solutions Creative**David Andrews**

Senior Graphic Designer
Wolters Kluwer's ELM Solutions

Contributing Analysts and Authors**Jason Bender**

Legal Analytics Product Manager
Wolters Kluwer's ELM Solutions

Deniece Bushell

Senior Product Marketing Manager
Wolters Kluwer's ELM Solutions

Nathan Cemenska

Associate Director, Product Management
Wolters Kluwer's ELM Solutions

Margie Sleboda

Lead Technology Product Manager
Wolters Kluwer's ELM Solutions

Executive Sponsor**Barry Ader**

Vice President, Product Management and Marketing
Wolters Kluwer's ELM Solutions

© 2004 - 2021 Wolters Kluwer's ELM Solutions. All rights reserved. This material may not be reproduced, displayed, modified, or distributed in any form without the express prior written permission of the copyright holders. To request permission, please contact:

ELM Solutions, a Wolters Kluwer business
20 Church Street
Hartford, CT 06103 United States
ATTN: Marketing
+1-860-549-8795

LEGAL CAVEAT

Wolters Kluwer's ELM Solutions has worked to ensure the accuracy of the information in this report; however, Wolters Kluwer's ELM Solutions cannot guarantee the accuracy of the information or analyses in all cases. Wolters Kluwer's ELM Solutions is not engaged in rendering legal, accounting, or other professional services. This report should not be construed as professional advice on any particular set of facts or circumstances. Wolters Kluwer's ELM Solutions is not responsible for any claims or losses that may arise from any errors or omissions in this report or from reliance upon any recommendation made in this report.

Table of Contents - 2021 Real Rate Report

A Letter to Our Readers • 4

Report Use Considerations • 5

Section I: High-Level Data Cuts • 9

- Partners, Associates, and Paralegals
- Partners, Associates, and Paralegals by Practice Area and Matter Type
- Partners and Associates by City
- Partners and Associates by City and Matter Type
- Partners by City and Years of Experience
- Associates by City and Years of Experience
- Partners and Associates by Firm Size and Matter Type

Section II: Industry Analysis • 64

- Partners, Associates, and Paralegals by Industry Group
- Partners and Associates by Industry Group and Matter Type
- Basic Materials and Utilities
- Consumer Goods
- Consumer Services
- Financials (Excluding Insurance)
- Health Care
- Industrials
- Technology and Telecommunications

Section III: Practice Area Analysis • 85

- Bankruptcy and Collections
- Commercial
- Corporate: Mergers, Acquisitions, and Divestitures
- Corporate: Regulatory and Compliance
- Corporate: Other
- Employment and Labor
- Environmental
- Finance and Securities
- General Liability (Litigation Only)
- Insurance Defense (Litigation Only)
- Intellectual Property: Patents
- Intellectual Property: Trademarks
- Intellectual Property: Other
- Real Estate

Section IV: In-Depth Analysis for Select US Cities • 175

- Boston, MA
- Chicago, IL
- Los Angeles, CA
- New York, NY
- Philadelphia, PA
- San Francisco, CA
- Washington, DC

Section V: International Analysis • 195

Section VI: Matter Staffing Analysis • 227

Appendix: Data Methodology • 232

A Letter to Our Readers

Welcome to the Wolters Kluwer's ELM Solutions Real Rate Report®, the industry's leading data-driven benchmark report for lawyer rates.

Our Real Rate Report has been a relied upon data analytics resource to the legal industry since its inception in 2010 and continues to evolve. The Real Rate Report is powered by Wolters Kluwer's ELM Solutions LegalVIEW® data warehouse, the world's largest source of legal performance benchmark data, which has grown to include over \$150 billion in anonymized legal data.

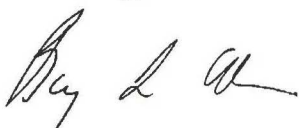
This year, we launched our LegalVIEW Insights Report series, which explores the emerging trends behind the overall legal spend volatility seen in corporate legal departments. The insights reports coupled with the Real Rate Report are great tools to drive actionable decisions.

The legal services industry relies on internal analytics and the use of external data resources, such as the LegalVIEW® data warehouse, to support legal management strategies. The depth and details of the data in the Real Rate Report enable you to better benchmark and make more informed investment and resourcing decisions for your organization.

As with past Real Rate Reports, all of the data analyzed are from corporations' and law firms' e-billing and time management solutions. We have included lawyer and paralegal rate data filtered by specific practice and sub-practice areas, metropolitan areas, and types of matters to give legal departments and law firms greater ability to pinpoint areas of opportunity. We strive to make the Real Rate Report a valuable and actionable reference tool for legal departments and law firms.

As always, we welcome your comments and suggestions on what information would make this publication more valuable to you. We thank our data contributors for participating in this program. And we thank you for making Wolters Kluwer's ELM Solutions your trusted partner for legal industry domain expertise, data, and analytics and look forward to continuing to provide market-leading, expert solutions that deliver the best business outcomes for collaboration among legal departments and law firms.

Sincerely,



Barry Ader

Vice President, Product Management and Marketing
Wolters Kluwer's ELM Solutions

Report Use Considerations

2021 Real Rate Report

- Examines law firm rates over time
- Identifies rates by location, experience, firm size, areas of expertise, industry, and timekeeper role (i.e., partner, associate, and paralegal)
- Itemizes variables that drive rates up or down

All the analyses included in the report derive from the actual rates charged by law firm professionals as recorded on invoices submitted and approved for payment.

Examining real, approved rate information, along with the ranges of those rates and their changes over time, highlights the role these variables play in driving aggregate legal cost and income. The analyses can energize questions for both corporate clients and law firm principals.

Clients might ask whether they are paying the right amount for different types of legal services, while law firm principals might ask whether they are charging the right amount for legal services and whether to modify their pricing approach.

Some key factors¹ that drive rates²:

Attorney location - Lawyers in urban and major metropolitan areas tend to charge more when compared with lawyers in rural areas or small towns.

Litigation complexity - The cost of representation will be higher if the case is particularly complex or time-consuming; for example, if there are a large number of documents to review, many witnesses to depose, and numerous procedural steps, the case is likely to cost more (regardless of other factors like the lawyer's level of experience).

Years of experience and reputation - A more experienced, higher-profile lawyer is often going to charge more, but absorbing this higher cost at the outset may make more sense than hiring a less expensive lawyer who will likely take time and billable hours to come up to speed on unfamiliar legal and procedural issues.

Overhead - The costs associated with the firm's support network (paralegals, clerks, and assistants), document preparation, consultants, research, and other expenses.

Firm size - The rates can increase if the firm is large and has various timekeeper roles at the firm. For example, the cost to work with an associate or partner at a larger firm will be higher compared to a firm that has one to two associates and a paralegal.

Rates increase in geographic areas with growing population

Additional analysis was performed to examine the impact of geographic location on law firm hourly rates. This report, like previous ones, shows that large, cosmopolitan legal services markets like New York City, San Francisco, and Los Angeles are associated with higher hourly rates. In addition, our analysis reveals a significant spike in hourly rates in areas of the country

¹ David Goguen, J.D., University of San Francisco School of Law (2020) Guide to Legal Services Billing Retrieved from: <https://www.lawyers.com/legal-info/research/guide-to-legal-services-billing-rates.html>

² Source: 2018 RRR. Factor order validated in multiple analyses since 2010

Report Use Considerations

that are currently experiencing high population growth. Significant average rate increases occurred from 2020 to 2021 in many areas, but especially Fresno, California (~15% average rate increase), Greenville, SC (~18%), Miami, FL (~9%), Nashville, TN (~11%), Oklahoma City (~13%), Phoenix, AZ (~10%), and Seattle, WA (~11%) -- all of which have experienced much higher than average population growth in recent years.

The correlation between hourly rates and population growth makes sense. When people and businesses move into an area, it creates a spike in demand for all sorts of goods and services, including legal services. However, it is hard for the supply of legal services to move as quickly as demand because attorneys looking to move into a new geographic area face high switching costs that most will refuse to pay unless they absolutely have to.

First, attorneys looking to take work in a new state have to get licensed there, which takes time and effort and is a distraction that can reduce their current income in the form of the number of hours they are able to bill to clients. Second, despite the rise in remote working, many attorneys looking to establish practices in a new geographic location may have to establish at least some physical presence there, find a new office, new lodging, and potentially uproot their entire family. Third, even if the switching costs of licensure, physically moving, etc. are paid, attorneys may fear yet another switching cost in the form of attrition of their existing clients from their original geographic locale, who may view them as no longer investing in their knowledge of the legal problems and legal solutions that are specific to the original locale.

³ Source: 2020 RRR. Factor order validated in multiple analyses since 2010

Section I: High-Level Data Cuts

Cities

By Matter Type

2021 - Real Rates for Associate and Partner

Trend Analysis - Mean

City	Matter Type	Role	n	First Quartile	Median	Third Quartile	2021	2020	2019
Kansas City MO	Non-Litigation	Associate	95	\$250	\$320	\$385	\$323	\$288	\$278
		Partner	14	\$285	\$350	\$484	\$402	\$445	\$413
Las Vegas NV	Non-Litigation	Associate	12	\$238	\$323	\$377	\$320	\$282	\$280
		Partner	19	\$250	\$300	\$445	\$375	\$421	\$480
Little Rock AR	Non-Litigation	Associate	12	\$215	\$215	\$300	\$267	\$290	\$274
		Partner	12	\$215	\$215	\$300	\$267	\$290	\$274
Los Angeles CA	Litigation	Associate	433	\$402	\$602	\$806	\$610	\$583	\$535
		Partner	342	\$475	\$715	\$1,042	\$759	\$708	\$694
Louisville KY	Non-Litigation	Associate	761	\$480	\$685	\$895	\$696	\$665	\$620
		Partner	559	\$600	\$880	\$1,160	\$894	\$872	\$816
Madison WI	Litigation	Associate	16	\$178	\$200	\$278	\$225	\$227	\$214
		Partner	18	\$265	\$356	\$405	\$344	\$353	\$338
Memphis TN	Non-Litigation	Associate	12	\$208	\$215	\$249	\$224	\$230	\$197
		Partner	20	\$298	\$340	\$369	\$345	\$346	\$334
Miami FL	Litigation	Associate	100	\$282	\$475	\$614	\$465	\$473	\$453
		Partner	100	\$282	\$475	\$614	\$465	\$473	\$453

Section I: High-Level Data Cuts

Cities

By Years of Experience

2021 - Real Rates for Associate

Trend Analysis - Mean

City	Years of Experience	n	First Quartile	Median	Third Quartile	2021	2020	2019
Jackson MS	7 or More Years	22	\$55	\$55	\$183	\$124	\$125	\$183
Kansas City MO	3 to Fewer Than 7 Years	26	\$252	\$310	\$349	\$306	\$294	\$292
	7 or More Years	28	\$295	\$325	\$370	\$325	\$283	\$282
Los Angeles CA	Fewer Than 3 Years	70	\$494	\$533	\$622	\$543	\$511	\$413
	3 to Fewer Than 7 Years	128	\$533	\$709	\$821	\$673	\$582	\$510
	7 or More Years	164	\$412	\$565	\$841	\$629	\$604	\$576
Miami FL	3 to Fewer Than 7 Years	14	\$277	\$340	\$408	\$364	\$323	\$323
	7 or More Years	30	\$310	\$475	\$540	\$431	\$429	\$374
Minneapolis MN	3 to Fewer Than 7 Years	23	\$330	\$351	\$462	\$394	\$388	\$355
	7 or More Years	26	\$326	\$448	\$580	\$441	\$397	\$384
Nashville TN	7 or More Years	13	\$245	\$283	\$325	\$287	\$271	\$253
New Orleans LA	3 to Fewer Than 7 Years	13	\$235	\$238	\$280	\$251	\$260	\$248
	7 or More Years	13	\$260	\$340	\$364	\$324	\$326	\$276
New York NY	Fewer Than 3 Years	160	\$440	\$590	\$775	\$629	\$560	\$513
	3 to Fewer Than 7 Years	237	\$412	\$670	\$875	\$681	\$625	\$559

Section I: High-Level Data Cuts

Cities

By Years of Experience

2021 - Real Rates for Partner

Trend Analysis - Mean

City	Years of Experience	n	First Quartile	Median	Third Quartile	2021	2020	2019
Los Angeles CA	Fewer Than 21 Years	173	\$550	\$855	\$1,065	\$815	\$724	\$703
	21 or More Years	332	\$527	\$725	\$1,145	\$844	\$818	\$758
Memphis TN	Fewer Than 21 Years	11	\$283	\$300	\$340	\$317	\$324	\$309
	21 or More Years	17	\$365	\$415	\$425	\$391	\$379	\$370
Miami FL	Fewer Than 21 Years	44	\$408	\$540	\$583	\$503	\$484	\$485
	21 or More Years	99	\$414	\$550	\$750	\$569	\$564	\$532
Milwaukee WI	Fewer Than 21 Years	14	\$306	\$358	\$433	\$373	\$355	\$323
	21 or More Years	26	\$375	\$470	\$545	\$535	\$530	\$431
Minneapolis MN	Fewer Than 21 Years	41	\$400	\$520	\$604	\$513	\$515	\$478
	21 or More Years	82	\$450	\$659	\$789	\$619	\$591	\$579
Nashville TN	Fewer Than 21 Years	27	\$375	\$464	\$495	\$436	\$413	\$374
	21 or More Years	49	\$420	\$470	\$536	\$481	\$472	\$433
New Orleans LA	Fewer Than 21 Years	24	\$275	\$305	\$390	\$346	\$361	\$337
	21 or More Years	40	\$295	\$332	\$412	\$352	\$373	\$369
New York NY	Fewer Than 21 Years	456	\$656	\$1,044	\$1,407	\$1,033	\$987	\$938

Section I: High-Level Data Cuts

Cities

By Role

2021 - Real Rates for Associate and Partner

Trend Analysis - Mean

City	Role	n	First Quartile	Median	Third Quartile	2021	2020	2019
Little Rock AR	Partner	16	\$215	\$250	\$300	\$272	\$287	\$282
Los Angeles CA	Partner	786	\$536	\$822	\$1,101	\$843	\$808	\$766
	Associate	1,110	\$450	\$653	\$860	\$664	\$636	\$587
Louisville KY	Partner	25	\$278	\$355	\$400	\$348	\$363	\$348
	Associate	25	\$180	\$210	\$264	\$224	\$228	\$210
Madison WI	Partner	15	\$241	\$389	\$536	\$419	\$435	\$440
Memphis TN	Partner	30	\$290	\$351	\$415	\$354	\$351	\$342
Miami FL	Partner	226	\$360	\$530	\$675	\$525	\$524	\$516
	Associate	149	\$265	\$361	\$475	\$375	\$381	\$365
Milwaukee WI	Partner	52	\$316	\$390	\$476	\$452	\$450	\$387
	Associate	36	\$270	\$305	\$358	\$316	\$305	\$269
Minneapolis MN	Partner	175	\$419	\$595	\$711	\$578	\$544	\$531
	Associate	137	\$295	\$406	\$521	\$405	\$377	\$376
Nashville TN	Partner	108	\$375	\$468	\$535	\$463	\$457	\$414
	Associate	73	\$252	\$311	\$338	\$305	\$283	\$257

Exhibit 2

LAFFEY MATRIX

[History](#)
[Case Law](#)
[See the Matrix](#)
[Contact us](#)
[Home](#)

			Years Out of Law School *				
Year	Adjustmt Factor**	Paralegal/ Law Clerk	1-3	4-7	8-10	11-19	20 +
6/01/24- 5/31/25	1.080182	\$258	\$473	\$581	\$839	\$948	\$1141
6/01/23- 5/31/24	1.059295	\$239	\$437	\$538	\$777	\$878	\$1057
6/01/22- 5/31/23	1.085091	\$225	\$413	\$508	\$733	\$829	\$997
6/01/21- 5/31/22	1.006053	\$208	\$381	\$468	\$676	\$764	\$919
6/01/20- 5/31/21	1.015894	\$206	\$378	\$465	\$672	\$759	\$914
6/01/19- 5/31/20	1.0049	\$203	\$372	\$458	\$661	\$747	\$899
6/01/18- 5/31/19	1.0350	\$202	\$371	\$455	\$658	\$742	\$894
6/01/17- 5/31/18	1.0463	\$196	\$359	\$440	\$636	\$717	\$864
6/01/16- 5/31/17	1.0369	\$187	\$343	\$421	\$608	\$685	\$826
6/01/15- 5/31/16	1.0089	\$180	\$331	\$406	\$586	\$661	\$796
6/01/14- 5/31/15	1.0235	\$179	\$328	\$402	\$581	\$655	\$789
6/01/13- 5/31/14	1.0244	\$175	\$320	\$393	\$567	\$640	\$771
6/01/12- 5/31/13	1.0258	\$170	\$312	\$383	\$554	\$625	\$753
6/01/11- 5/31/12	1.0352	\$166	\$305	\$374	\$540	\$609	\$734
6/01/10- 5/31/11	1.0337	\$161	\$294	\$361	\$522	\$589	\$709
6/01/09- 5/31/10	1.0220	\$155	\$285	\$349	\$505	\$569	\$686
6/01/08- 5/31/09	1.0399	\$152	\$279	\$342	\$494	\$557	\$671
6/01/07-5/31/08	1.0516	\$146	\$268	\$329	\$475	\$536	\$645
6/01/06-5/31/07	1.0256	\$139	\$255	\$313	\$452	\$509	\$614
6/1/05-5/31/06	1.0427	\$136	\$249	\$305	\$441	\$497	\$598
6/1/04-5/31/05	1.0455	\$130	\$239	\$293	\$423	\$476	\$574
6/1/03-6/1/04	1.0507	\$124	\$228	\$280	\$405	\$456	\$549
6/1/02-5/31/03	1.0727	\$118	\$217	\$267	\$385	\$434	\$522
6/1/01-5/31/02	1.0407	\$110	\$203	\$249	\$359	\$404	\$487
6/1/00-5/31/01	1.0529	\$106	\$195	\$239	\$345	\$388	\$468
6/1/99-5/31/00	1.0491	\$101	\$185	\$227	\$328	\$369	\$444
6/1/98-5/31/99	1.0439	\$96	\$176	\$216	\$312	\$352	\$424
6/1/97-5/31/98	1.0419	\$92	\$169	\$207	\$299	\$337	\$406
6/1/96-5/31/97	1.0396	\$88	\$162	\$198	\$287	\$323	\$389

6/1/95-5/31/96	1.032	\$85	\$155	\$191	\$276	\$311	\$375
6/1/94-5/31/95	1.0237	\$82	\$151	\$185	\$267	\$301	\$363

The methodology of calculation and benchmarking for this Updated Laffey Matrix has been approved in a number of cases. See, e.g., *DL v. District of Columbia*, 267 F.Supp.3d 55, 69 (D.D.C. 2017)

* $i_{\frac{1}{2}}$ Years Out of Law School $i_{\frac{1}{2}}$ is calculated from June 1 of each year, when most law students graduate. $i_{\frac{1}{2}}1-3$ " includes an attorney in his 1st, 2nd and 3rd years of practice, measured from date of graduation (June 1). $i_{\frac{1}{2}}4-7$ " applies to attorneys in their 4th, 5th, 6th and 7th years of practice. An attorney who graduated in May 1996 would be in tier $i_{\frac{1}{2}}1-3$ " from June 1, 1996 until May 31, 1999, would move into tier $i_{\frac{1}{2}}4-7$ " on June 1, 1999, and tier $i_{\frac{1}{2}}8-10$ " on June 1, 2003.

** The Adjustment Factor refers to the nation-wide Legal Services Component of the Consumer Price Index produced by the Bureau of Labor Statistics of the United States Department of Labor.

Exhibit 3

Date	Expense Code	Description	Debit	Credit	Billing Status	On Hold	Invoice Number	Check Number	Payee
		Balance Forward:	\$0.00						
11/14/2022	ONE	One Legal Services - Complaint, Summons, Civil case Cover- in# 04526894	\$1,490.20		Unbilled				
11/18/2022	POS	Postage - 11.10.22 mailing LWDA	\$19.78		Unbilled				
11/18/2022	FIL	Filing Fee - 11.10.22 LWDA	\$75.00		Unbilled				
01/04/2023	FST	First Legal Network - Process Serve - Class Complaint and Initial Docs, FAC IN# 30224217	\$378.11		Unbilled				
01/13/2023	ONE	One Legal Services - Proof of Service- in#04671924	\$12.87		Unbilled				
01/20/2023	ONE	One Legal Services - Proof of Service- in#04688114	\$13.33		Unbilled				
01/25/2023	ONE	One Legal Services - Amended Complaint - in#04696808	\$13.33		Unbilled				
11/21/2023	MED	Mediation Services IN#2061 CK#11282	\$9,000.00		Unbilled				
04/24/2024	EXA	Expert Analysis IN#11437 CK#11756	\$3,960.00		Unbilled				
08/05/2025	LDS	Legal Document Server - EFiled - Ex Parte Application IN# 12581742	\$95.75		Unbilled				
		Total:	\$15,058.37	\$0.00					
		Balance:	\$15,058.37						

Matter Billing Detail

JAMES HAWKINS APLC

Date	Expense Code	Description	Debit	Credit	Billing Status	On Hold	Invoice Number	Check Number	Payee
Total Fees Billed-----			\$0.00						
Total Fees Unbilled : -----			\$0.00						
Total Fees Received : -----			\$0.00						
Total Soft Cost Billed : -----			\$0.00						
Total Soft Cost Unbilled : -----			\$0.00						
Total Soft Cost Received : -----			\$0.00						
Total Hard Cost Billed : -----			\$0.00						
Total Hard Cost Unbilled : -----			\$15,058.37						
Total Hard Cost Received : -----			\$0.00						
Total Taxes Billed : -----			\$0.00						
Total Taxes Unbilled : -----			\$0.00						
Total Taxes Received : -----			\$0.00						
Total Late Charges Billed : -----			\$0.00						
Total Late Charges Unbilled: -----			\$0.00						
Total Late Charges Received : -----			\$0.00						
Trust Balance: -----			\$0.00						