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Attorneys for Plaintiffs BENIYAM KEBEDE, ALAIN TSAI,
and MONICA I. PAZMINO, individually and on behalf of
all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SANTA CLARA

BENIYAM KEBEDE, ALAIN TSAI, and
MONICA I. PAZMINO, individually and
on behalf of all others similarly situated,

Plaintiffs,

v.

WRIKE, INC.; and DOES 1 through 25,
inclusive

Defendants.

Case No. 20CV366599

ASSIGNED FOR ALL PURPOSES TO:

The Honorable Patricia M. Lucas

Department 3

CLASS ACTION

**DECLARATION OF JEFF GERACI IN
SUPPORT OF MOTION FOR ORDER
GRANTING FINAL APPROVAL OF
CLASS ACTION SETTLEMENT AND
ENTERING JUDGMENT**

Date: May 4, 2022

Time: 1:30 p.m.

Dept: 3

Judge: Hon. Patricia M. Lucas

Complaint filed: May 13, 2020

Trial date: Not set

1 I, Jeff Geraci, declare as follows:

2 1. I am a Partner with the law firm of Cohelan Khoury & Singer, co-counsel of record
3 for Plaintiffs Beniyam Kebede, Alain Tsai, and Monica I. Pazmino. I make this Declaration in
4 support of Plaintiffs' Motion for Final Approval of Class Action Settlement. This Declaration is
5 based on my personal knowledge and if called to testify I could and would competently testify to
6 the matters contained in this Declaration.

7 2. I am a 1990 University of San Diego School of Law graduate, admitted to the
8 California State Bar in 1990. I am admitted to all California state and federal courts. I have
9 provided counseling and representation in all areas of employment law, including wrongful
10 termination, discrimination, harassment, and wage and hour law since 1992. I founded Law Office
11 of Jeff Geraci in 1999 and managed that firm through 2009, when I joined Cohelan Khoury &
12 Singer. I have conducted six jury trials of employment law cases to verdict as sole trial counsel,
13 prevailing in four. My practice has focused solely on litigation of class and representative actions,
14 particularly wage and hour class actions, for the past 12 years. I have drafted amicus letters on a
15 range of issues, primarily for the California Employment Lawyers Association (CELA), supporting
16 publication or depublication of Court of Appeal decisions. I have been primarily responsible for
17 dozens of wage and hour class actions, from drafting the complaint, through discovery, dispositive
18 motions, settlement, and settlement approval.

19 3. I have acted as lead appellate counsel in a dozen matters, including the published
20 employment cases, *McAlindin v. County of San Diego* (1999) 192 F.3d 1226 (9th Cir. 1999)
21 [reversing summary judgment in a disability discrimination case]; *Vaquero v. Ashley Furniture*
22 *Indus.*, 824 F.3d 1150 (9th Cir. 2016) [affirming class certification for sales associates].

23 4. In 1981, Timothy D. Cohelan and Isam C. Khoury formed Cohelan & Khoury, a
24 Partnership of Professional Law Corporations, and within a few years began to focus on class
25 actions. In 2009, Cohelan & Khoury became Cohelan Khoury & Singer. Our firm represents
26 plaintiffs in complex, class and representative action litigation, including wage and hour, labor and
27 employment, antitrust, consumer protection, construction defect and other public interest type class
28 and representative actions.

1 5. Managing Partner Michael D. Singer was admitted as a fellow to the College of
2 Labor and Employment Attorneys in 2020, and named to the Daily Journal 2012, 2013, and
3 2018 list of Top California Labor and Employment Attorneys. He, along with Isam Khoury, a
4 founding Partner of the firm, and Partner Diana M. Khoury, have also been selected by their peers
5 based on ethics, experience and reputation as Super Lawyers in Civil Litigation by the Southern
6 California Super Lawyers Magazine for the years 2012 through the present.

7 6. Cohelan Khoury & Singer has been certified by the State Bar of California to
8 provide the Mandatory Continuing Legal Education activity entitled “Litigating California Class
9 Actions” and has conducted MCLE certified seminars on this topic. Senior Partner, Timothy D.
10 Cohelan, is the author of Cohelan on California Class Actions (1997-2021, updated annually), part
11 of Thomson Reuters Expert Series updated annually. Michael D. Singer is a contributing author on
12 the CEB publication California Wage and Hour Law: Compliance and Litigation (2010-2021
13 updated annually), in which he wrote the opening chapter overview on California Wage and Hour
14 laws, including the public policy underpinnings for those laws, and the Private Attorneys General
15 Act (PAGA) Claim chapter. He is also a contributing author to the CEB Practitioner (2020),
16 including guidelines for oral argument and forms for PAGA litigation. Mr. Singer has served as a
17 columnist for the California State Bar, Litigation Section on wage and hour litigation and has
18 contributed articles on wage and hour and class action issues through the years to numerous
19 California publications. Prior to COVID, he typically lectured several times per year for continuing
20 education courses on wage and hour and class action issues at events in San Diego, Orange County,
21 Los Angeles, and San Francisco. For over twelve years, Mr. Singer has served as wage and hour
22 amicus co-chair and liaison for the California Employment Lawyers Association, drafting,
23 reviewing, and coordinating amicus filings on wage and hour issues in the California Supreme
24 Court and Courts of Appeal. He has been engaged in the practice of labor and employment law
25 since 2000, handling well over 300 wage and hour class and PAGA actions and several individual
26 labor cases. He has litigated several types of employment actions, including complex ERISA
27 employee welfare benefit plan cases, as well as wage and hour class actions before Federal and
28 State Courts in California. In 2014, Mr. Singer, along with Partner J. Jason Hill, tried a wage and

1 hour class action involving claims for illegally deducted wages and unreimbursed expenses. *Dilts v*
2 *Penske Logistics LLC, Inc.* Mr. Singer successfully appealed the trial court ruling in *Dilts* finding
3 state laws preempted by the FAAAA for truck drivers.

4 7. Mr. Singer has participated in over 50 appellate cases and argued writs and appeals
5 before several California District Courts of Appeal, arguing for plaintiffs on rehearing in *Brinker*
6 *International Inc. v. Superior Court* before the Fourth District Court of Appeal, as well as federal
7 appeals in the Second, Third, and Ninth Circuit Courts of Appeals. In addition, Mr. Singer has
8 drafted numerous appellate briefs as the appellant, respondent, or amicus curiae in employment
9 class and individual actions. As co-Class Counsel in *Brinker Restaurant Corp. v. Superior Court*
10 [formerly reported at (2008)165 Cal.App.4th 25], Mr. Singer argued before the Fourth District
11 Court of Appeal in May 2008 on transfer from the California Supreme Court, and co-authored the
12 successful Petition for Review. My firm has successfully tried class cases, obtained appellate
13 reversals of class certification denials (*Hicks v. Kaufman and Broad*, (2001) 89 Cal.App.4th 908),
14 and certified multiple wage and hour classes.

15 8. As a part of our overall firm philosophy lawyers perform community service and
16 pro bono work. Firm volunteer work includes service through the Legal Aid at Work, San Diego
17 Volunteer Lawyer Program, the San Diego County Bar Foundation and Consumer Attorneys of
18 San Diego. During law school, I interned for the ACLU and Equal Rights Assistance assisting on
19 impact litigation class action lawsuits. I am a past recipient of the Wiley W. Manuel Award for Pro
20 Bono Service. Mr. Singer has served on the Legal Aid at Work Board of Directors since 2011. Mr.
21 Cohelan served as the Chair of the San Diego Volunteer Lawyers Program from 2015-2018, and
22 currently sits on the Board as past Chair. He completed 24 years of volunteer judicial service as a
23 Judge Pro Tem of the San Diego Superior Court. Since admission to the California Bar, Partner
24 Diana M. Khoury has been a member of the San Diego County Bar Association, Consumer
25 Attorneys of San Diego, Consumer Attorneys of California, and American Association for Justice
26 serving and chairing various committees through the years for these organizations. For six years
27 from 2010 through 2015, Ms. Khoury served on the Board of Directors for Consumer Attorneys of
28 San Diego. Since 2013, Ms. Khoury actively serves on the Board of Directors for the San Diego

County Bar Foundation, the 501(c)(3) charitable arm of the San Diego County Bar Association providing access to justice to the underserved and impoverished in the San Diego County region. Our firm's recent pro bono victories include a settlement which prohibits the City of San Diego from targeting homeless people for illegal lodging tickets under Penal Code Section 467(j). (*Spencer v. City of San Diego*, USDC Case No 04CV-2314 BEN (WMC).) The *Spencer* settlement had the effect of increasing the number of available shelter beds in San Diego.

9. Cohelan Khoury & Singer has been certified Class Counsel in the following contested proceedings: *Aguilar v. Atlantic Richfield, et al.*, San Diego County Superior Court Case No. 00700810; *Andino v. Kaiser Foundation Hospitals*, Alameda County Superior Court Case No. RG11580548; *Arellano, et al. v. Container Connection of Southern California, Inc.*, Los Angeles County Superior Court Case No. BC500675; *BANK OF AMERICA WAGE AND HOUR EMPLOYMENT PRACTICES LITIGATION*, United States District Court, District of Kansas MDL Case No. 2138 (FLSA Condition Certification); *Czuchaj v. Conair Corporation*, United States District Court, Southern District of California Case No. 13CV1901; *Dilts, et al. v. Penske Logistics, L.L.C., et al.*, United States District Court, Southern District of California Case No. 08CV0318; *Englert, et al. v. AT&T Wireless Services, Inc., et al.*, Circuit Court of the Second Circuit, State of Hawaii Case No. 02-1-0074; *Evans v. Washington Mutual Bank*, Orange County Superior Court Case No. 02CC15415; *Filion v. Ethan Allen Retail Inc.*, United States District Court, Southern District of California Case No. 05CV2340; *Gerard v. Les Schwab Tire Centers of California, Inc.*, Sacramento County Superior Court Case No. 2007-30000003; *Grana, et al. v. PICO Enterprises, Inc. dba Phyle Inventory Control Specialist and PICS L.A.S.C.* Case No. BC472891; *Gutierrez v. Save Mart Supermarkets* San Mateo Superior Case No. CIV530955; *Wilcox v Albertsons*, San Diego County Superior Court Case No. GIC833922; *Gonzalez, et al. v. Freedom Communications, Inc. d/b/a The Orange County Register*, Orange County Superior Court Case No. 03CC08756; *Graham, et al. v. Overland Solutions, Inc.*, United States District Court, Southern District of California Case No. 10CV0672 (FLSA Conditional Certification); *Hicks v. Kaufman and Broad Home Corp.*, Los Angeles County Superior Court Case No. B198414; *Hohnbaum, et al. v. Brinker Restaurant Corporation, et al.*, San Diego County Superior Court Case

No. GIC834348; *KEMP, et al. v. CSEA, et al.*, Circuit Court of the First Circuit, State of Hawaii Case No. 98-3815-08; *LIBERTY MUTUAL OVERTIME CASES*, Los Angeles County Superior Court Case No. JCCP 4234; *Mitchell, et al. v. Acosta, Inc., dba Acosta Sales and Marketing Company*, United States District Court, Central District of California Case No.11CV07196 (FLSA Conditional Certification); *Santana v. Rady Children's Hospital-San Diego*, San Diego County Superior Court Case No. 37-2014-00022411; *Schaffer v. Rady Children's Hospital-San Diego*, San Diego County Superior Court Case No. 337-2015-00022978; *Schneider, et al. v. Catholic Healthcare West*, San Francisco County Superior Court Case No. CGC-10-506243; *Salucci v. Amada Senior Care, Inc.*, Orange County Superior Court Case No. 37-2015-00778081; *Smith v. California Pizza Kitchen*, San Diego County Superior Court Case No. 37-2008-00083992; STEROID HORMONE PRODUCT CASES, Los Angeles County Superior Court Case No. JCCP 4363; *Stevenson Aibangbee v. Victoria Apartments, et al.*, Los Angeles County Superior Court Case No. BC299498; *Swift v. Liebert Corp.*, Orange County Superior Court Case No. 00CC04588; *Sylvia, et al. v. Wells Fargo Home Mortgage, Inc.*, Orange County Superior Court Case No. 03CC05747; *Vaquero v. Ashley Furniture Industries, Inc., et al.*, United States District Court, Central District of California Case No. 12CV8590; *Vaquero v. Stoneledge Furniture LLC*, Los Angeles County Superior Court Case No. BC522676; *Vazquez v. Kraft Heinz Foods Company*, United States District Court, Southern District of California Case No. 16-CV-02749; *Watson v. Raytheon Company*, United States District Court, Southern District of California Case No. 10CV0634; and *Weigle v. FedEx Ground Package System, Inc.*, United States District Court, Southern District of California Case No. 06CV1330, among others, as well as being appointed Class Counsel in connection with well over 200 class action settlements.

10. As Class and PAGA Representative Counsel, Cohelan Khoury & Singer has actively commenced, prosecuted and concluded numerous state and federal class and representative actions. Since 2016, Cohelan Khoury & Singer has played a central role in the resolution of over 200 such cases, including the following, which have received court approval: (a) *Arellano, et al. v. Container Connection of Southern California, Inc.*, Los Angeles County Superior Court, Case No. BC500675, Hon. Anne I. Jones; (b) *Castro v. Home Depot U.S.A., Inc.*, Los Angeles County

1 Superior Court, Case No. BC577885, Hon. Elihu M. Berle; (c) *Czuchaj v. Conair Corporation*,
2 United States District Court, Southern District of California, Case No. 13-CV-1901 BEN, Hon.
3 Roger T. Benitez; (d) *Gardiner v. TSYS*, United States District Court, Central District of California,
4 Case No. 18-cv-00415, Hon. David O. Carter; (e) *Grana v. PICO Enterprises, Inc.*, Los Angeles
5 County Superior Court, Case No. BC472891, Hon. Stephanie M. Bowick; (f) *Gutierrez v. Save*
6 *Mart Supermarkets*, San Mateo County Superior Court, Case No. CIV530955, Hon. Marie S.
7 Weiner; (g) *Hernandez v. Workforce Enterprises WFE, Inc.*, Los Angeles County Superior Court
8 Case No. BC590913, Hon. Elihu M. Berle; (h) *Hicks v. Poway Academy of Hair Design, Inc.*, San
9 Diego County Superior Court, Case No. 2014-00026517, Hon. Ronald L. Styn; (i) *Hubbard v.*
10 *Caliber Home Loans, Inc.*, Orange County Superior Court, Case No. 2018-01017838; (j) *Klein v.*
11 *Loomis Armored US, LLC*, San Bernardino County Superior Court, Case No. CIVDS1704547,
12 Hon. David Cohn; (k) *Laureano v. The Art of Shaving*, Los Angeles County Superior Court, Case
13 No. BC550093, Hon. Amy D. Hogue; (l) *Lopez, et al. v. Management & Training Corporation, et*
14 *al.*, United States District Court, Southern District of California, Case No. 17-CV-010624 JM, Hon.
15 Jeffrey T. Miller; (m) *Magdaleno v. Shelly Automotive, LLC*, Orange County Superior Court Case
16 No. 2013-0043958, Hon. Kim. G. Dunning; (n) *McGrath, et al. v. Wyndham Resort Development*
17 *Corporation, et al.*, United States District Court, Southern District of California, Case. No. 15-CV-
18 1631 JM, Hon. Jeffrey T. Miller; (o) *Mena v. Wolfgang Puck Catering*, Los Angeles County
19 Superior Court Case No. BC582743, Hon. John Shepard Wiley, Jr.; (p) *Morales v. The Los Angeles*
20 *Country Club*, Los Angeles County Superior Court, Case No. BC566493, Hon. William F.
21 Highberger; (q) *Nijmeh v. Bon Appetit Management Company, Inc.*, Santa Clara County Superior
22 Court, Case No. 16CV294127, Hon. Thomas E. Kuhnle; (r) *Plascencia v. Aramark Services, Inc.*,
23 Santa Clara County Superior Court, Case No. 2015-1-CV-288310, Hon. Brian C. Walsh; (s)
24 *Plimpton v. Gordon Trucking, Inc.*, San Bernardino County Superior Court, Case No. CIV-DS-
25 1511918, Hon. Donald Alvarez; (t) *Raya v. Amazon*, USDC, Northern District of California, Case
26 No. 15-CV-02005 MMC, Hon. Maxine M. Chesney; (u) *Rivas v. ESA Management*, USDC,
27 Central District of California, Case No. 14-CV-5767, Hon. Dale S. Fischer; (v) *Rodriguez v*
28 *Healthcare Partner Medical Group, Inc.*, Los Angeles County Superior Court, Case No.

BC541313, Hon. Kenneth Freeman; (w) *Ryan v. Dignity Health*, Sacramento County Superior Court Case No. 2013-00147371, Honorable Alan G. Perkins; (x) *Santana v. Rady Children's Hospital-San Diego*, San Diego County Superior Court Case No. 37-2014-00022411, Hon. Joel R. Wohlfeil; (y) *Schaffer v. Rady Children's Hospital-San Diego*, San Diego County Superior Court Case No. 337-2015-00022978; Hon. Joel R. Wohlfeil; (z) *Schneider v. Catholic Healthcare West*, San Francisco County Superior Court, Case No. CGC-10-506243, Hon. Angela Bradstreet; (aa) *Schwartz v Bank of the West*, San Francisco County Superior Court, Case No. CGC-14-538955, Hon. Harold E. Kahn; (bb) *Syed v. M.I. Swaco*, USDC, Eastern District of California, Case No. 12-CV-01718 DAD, Hon. Dale A. Drozd; (cc) *Vaquero, et al. v. Stoneledge Furniture, LLC*, Los Angeles County Superior Court Case No. BC522676, Hon. Elihu M. Berle; (dd) *Vazquez v. Kraft Heinz Foods Company*, USDC, Southern District of California Case No. 16-CV-02749, Hon. William Q. Hayes; (ee) *Walsh v. Cedars-Sinai Medical Center*, Los Angeles County Superior Court Case No. BC487290, Hon. William F. Highberger; among others.

11. Plaintiffs seek final approval of a \$2,000,000 non-reversionary wage and hour class and PAGA settlement for 222 Wrike, Inc. ("Wrike") commissioned employees who worked any time April 6, 2016 to March 31, 2021 ("Class Period"). This includes \$1,796,000 new money and \$204,000 Wrike paid pre-mediation to 102 employees for individual settlement agreements.

12. The Class response to the Settlement was extremely favorable. There were zero objections or requests for exclusion. Class Members will receive payments averaging \$4,653.94, with a highest payment of \$13,897.96, upon Settlement Approval. Plaintiffs' estimated individual settlement amount are: Beniyam Kebede - \$3,058.35; Alain Tsai - \$6,227.45; Monica Pazmino - \$3,025.88.

13. Beniyam Kebede worked as an Account Manager from August 2019 to January 2020. Alan Tsai was a Strategic Account Manager from October 2018 to August 2020. Monica Pazmino was a Senior Account Manager from October 2019 to April 2020.

14. Wrike provides cloud-based project management applications, known as "software as a service," with customers paying a monthly amount for those services. Wrike is headquartered in San Jose, with offices in San Diego, Japan, Australia, among other places.

1 15. The Class is, “All current and former commissioned employees who worked for
2 Defendant within the State of California during the Class Period.” The 222 class members
3 worked 15,112 weeks during the Class Period; 159 aggrieved employees worked 3,879 pay
4 periods from April 6, 2019 to March 31, 2021 (“PAGA Period”).

5 16. The action was filed May 13, 2020, alleging failure to provide: all minimum,
6 regular, and overtime wages; compliant rest and meal periods; accurate wage statements; timely
7 final wages; reimbursement of business expenses. PAGA claims were filed June 30, 2020.

8 17. The original plaintiff was dismissed, and a Second Amended Complaint adding
9 plaintiffs, Beniyam Kebede, Alain Tsai, and Monica Pazmino was filed September 30, 2020.
10 A Third Amended Complaint adding PAGA claims was filed October 26, 2020.

11 18. After receiving PAGA charges, and a catalyst letter advising Plaintiffs would
12 challenge subsequent settlements and seek attorneys’ fees on amounts paid, Wrike paid \$2,000
13 each to 102 class members (\$204,000) (“Prior Releasors”).

14 19. Wrike moved to compel arbitration of Ms. Pazmino’s claims and stay the others in
15 November 2020. (46 class members signed arbitration provisions). Plaintiffs opposed and soon
16 after the Parties agreed to mediate and stay the motion.

17 20. Plaintiffs alleged Wrike misclassified class members as exempt primarily because,
18 in some weeks, less than half their compensation was commission. Plaintiffs also alleged Wrike
19 did not provide rest and meal periods, or reimbursement for cell phone and internet expenses.

20 21. Wrike argued it did not discourage breaks, and provided evidence it provided
21 food, and separate spaces to relax and eat. This was confirmed in employee interviews.

22 22. The Parties mediated with Louis Marlin, Esq., a respected mediator of wage and
23 hour class actions, after a substantial amount of documents and class pay data, and aggregate
24 workweeks and pay periods for the class and PAGA periods were exchanged and a class wide
25 damage model created.

26 23. After a full day of arms’-length negotiations, the Parties reached a settlement in
27 principle and later negotiated the Joint Stipulation of Settlement and Release of Class Action,
28 (“Settlement Agreement”), preliminarily approved by the Court.

24. Subject to Court approval, Wrike will pay the maximum Gross Settlement Amount (“GSA”) of \$2,000,000, (\$1,796,000, plus \$204,000 paid to 102 class members pre-mediation) including: (a) attorneys’ fees of \$666,666 (1/3 of GSA; the SA allows up to 35%) to compensate Class Counsel for work performed and remaining to secure final Court approval (b) litigation costs of \$10,657.85 (The SA estimated \$12,500); (c) Class Representative Service Awards of \$10,000 each to the Class Representatives for risks undertaken for costs if the case had not successfully concluded, and benefits conferred on the Class; (d) PAGA Payment of \$50,000 [\$37,500 to LWDA (75%)/\$12,5000 to Aggrieved Employees (25%)]; and (e) Settlement Administration costs of \$5,500. Wrike will pay employer’s payroll taxes in addition to GSA.

25. Plaintiff consented to apportion fees: 50% to Cohelan Khoury & Singer, and 50% to Lebe Law, APLC.

26. After Court-approved deductions, the estimated Net Settlement Amount (“NSA”) of \$1,033,176.15, will be distributed to Participating Class Members. Individual Settlement Payments will be calculated by first allocating \$2,000 each to the estimated 120 class members (\$240,000), who did not receive \$2,000 for a release before mediation. The Administrator will divide total number of weeks worked by all class members in the Class Period by the remainder of the NSA, \$829,176.15, to determine “workweek dollar value.” ($\$829,176.15 / 15,112.05 \text{ weeks} = \54.868). The Administrator will then multiply the number of weeks each Prior Releasor worked by 1.0, then by the workweek dollar value. For class members who did not previously receive a \$2,000 payment, the Administrator will multiply number of weeks worked by 1.1, then by the workweek dollar value. This provides a greater amount to class members who did not risk exclusion from the class by accepting an individual settlement this class Settlement.

27. The 159 aggrieved employees will divide the 25% PAGA payment based on pay periods worked during the PAGA period, even if they opt-out of the class settlement. The average PAGA payment is \$56.31, and the highest PAGA payment is \$167.10.

28. Settlement Checks uncashed 180 days after issuance will be sent to cy pres recipient, Legal Aid at Work. Uncashed PAGA payments will be sent to the State Controller, Unclaimed Property Division, in the appropriate employee’s name.

29. On December 6, 2021, the Court preliminarily approved the proposed Settlement and Notice Packet for mailing to the Class.

30. On January 19, 2022, after searching the National Change of Address database, and updating Class Member addresses, the Settlement Administrator mailed Notice Packets to 222 Class Members. The Notice Packet informed them of (1) the pendency of the Class Action; (2) terms of the proposed Settlement; (3) automatic payment of a proportionate Settlement share if exclusion was not requested; (4) estimated amount each Participating Class Members will receive based on eligible weeks worked during the Class and PAGA Period; (5) released claims; (6) the right to object or request exclusion, and (7) the date, time and place of the final approval hearing.

31. The Class response to the Settlement was extremely favorable. No objections and no requests for exclusion were received.

32. Nothing has changed since the Court granted Preliminary Approval of the Settlement to negate the presumption of fairness. Class Counsel remains convinced the Settlement is in the Class' best interest.

33. Class Counsel requests attorneys' fees of \$666,666, one-third of the GSA, and actual litigation costs of \$10,657.85. To bring this matter to final approval, Class Counsel will have expended 414.8 hours, a lodestar of \$277,826. Additional time and expense will be incurred completing the approval process, including preparing for and appearing at the final approval hearing, answering class member questions following distribution, and working with the administrator and defense counsel to resolve any issues related to distributions. Exhibit 1 is a true and correct copy of the Consolidated Summary of Class Counsel's Summary of Hours and Costs for my firm as well as co-Class Counsel; Exhibit 2, a true and correct copy of Cohelan Khoury & Singer's Lodestar Task Chart; Exhibit 3, a true and correct copy of CKS' Itemization of Costs.

34. Class Counsel's request for one-third of the common fund is in the mid-range of fee awards which commonly range from 20% to 50%, and fair compensation for undertaking complex, risky, time-consuming litigation on a contingent basis for two years, and for the results achieved. Many California state and federal courts routinely approve fee requests equal to or greater than sought here.

California cases: *Estrada, Alvarez vs. Burrtec Waste Group, Inc., et al.*, San Diego Super. Ct., Case No. 37-2011-00096268-CU-OE-CTL (Hon. Joel M. Pressman – approving attorneys’ fees of 33-1/3% of \$2,789,000 in a pre-certification meal violation class action); *White v. Edco Disposal Corp., et al.*, San Diego Super. Ct., Case No. 37-2011-00088803-CU-OE-CTL (Hon. Judith Hayes – approving attorneys’ fees of 33-1/3% of \$3,500,000 in a pre-certification meal violation class action); *Parker v. City of L.A.*, 44 Cal. App. 3d 556, 567-68 (1974) (33.3%); *Tokar v. GEICO*, No. GIC 810166 (San Diego County Super. Ct. July 9, 2004) (approving award of attorney’s fees of 33-1/3% of recovery in a wage and hour class action); *Marroquin v. Bed Bath & Beyond*, No. RG04145918 (Alameda County Super. Ct. June 22, 2004) (in a wage and hour class action, 33.3%); *Crandall v. U-Haul Int’l, Inc.*, No. BC178775 (Los Angeles County Super. Ct. Aug. 17, 2001) (in a wage and hour class action, 40%); *Davis v. The Money Store, Inc.*, No. 99AS01716 (Sacramento County Super. Ct. Dec. 26, 2000) (in a wage and hour class action, awarding 33.3% of \$6,000,000 settlement); *Kenemixay v. Nordstrom, Inc.*, (L.A. County Super. Ct., No. BC318850) (50% award); *Albrecht v. Rite Aid Corp.*, No. 729219 (San Diego County Super. Ct.) (35% award).

Federal cases: *Wren v. RGIS Inventory Specialists*, No. C-06-05778 JCS, 2011 WL 1230826, at *28 (N.D. Cal. April 1, 2011) (approving fee that amounted to 42% of common fund in wage and hour class action); *Vasquez v. Coast Valley Roofing*, 266 F.R.D. 482, 491-93 (wage-and-hour action putative class-action settlement where court approved award of attorneys’ fees in the amount of 33.3% of the common fund); *In re Ampicillin Antitrust Litig.*, 526 F. Supp. 494 (D.D.C. 1981) (45%); *Beech Cinema, Inc. v. Twentieth-Century Fox Film Corp.*, 480 F. Supp. 1195(S.D.N.Y. 1979), aff’d, 622 F.2d 1106 (2d Cir. 1980) (in a Sherman Act case, approximately 53%); *In re Heritage Bond*, 2005 WL 1594389, at *20 (C.D. Cal. June 10, 2005) (award of attorneys’ fees of one-third of \$27,783,000-the Settlement Fund is fair and reasonable); *Fernandez v. Victoria Secret Stores, LLC*, No. CV 06-04149 MMM (SHx), 2008 WL 8150856, at *16 (C.D. Cal. July 21, 2008) (awarding 34% in fees of common fund); *Martin v. FedEx Ground Package Sys., Inc.*, No. C06-6883 VRW, 2008 WL 5478576, at *8 (N.D. Cal. Dec. 31, 2008) (truck driver meal break class action where the court approved attorneys’ fees of 1/3 of common fund); *Singer v. Becton Dickinson & Co.*, No. 08-CV-821-IEG (BLM), 2010 WL 2196104, at *8

(S.D. Cal. Jun. 1, 2010) (noting 33.33% of common fund for a wage and hour class action settlement “falls within the typical range of 20% to 50% awarded in similar cases”).

35. Within the past several years, Cohelan Khoury & Singer has been awarded one-third of a common fund, in the following class and representative action settlements:

a) *Luareno v. The Art of Shaving*, Los Angeles Superior Court, Case No. BC550093 (Hon. Amy D. Hogue – approving attorneys’ fees of 33-1/3% of \$950,000 Settlement in a pre-certification wage and hour class action);

b) *Ramirez v. Kirkhill-TA CO.*, Los Angeles Superior Court, Case No. BC557207 (Hon. Kenneth Freeman – approving attorneys’ fees of 33-1/3% of \$1,100,000 Settlement in a pre-certification wage and hour class action);

c) *Gutierrez v. Benchmark*, San Diego Superior Court, Case No. 2014-00032287 (Hon. Joel M. Pressman – approving attorneys’ fees of 33-1/3% of \$350,000 Settlement in a pre-certification wage and hour class action);

d) *Morales v. The Los Angeles Country Club*, Los Angeles Superior Court, Case No. BC566493 (Hon. William F. Highberger – approving attorneys’ fees of 33-1/3% of \$600,000 settlement in a pre-certification wage and hour class action);

e) *Rodriguez v. Healthcare Partner Medical Group, Inc.*, Los Angeles Superior Court, Case No. BC541313 (Hon. Kenneth Freeman – approving attorneys’ fees of 33-1/3% of \$6,000,000 settlement in a pre-certification wage and hour class action);

f) *Smith v. Unionbancal Corp.*, San Francisco Superior Court, Case No. CGC-11-508019 (Hon. Harold E. Kahn – approving attorneys’ fees of 33-1/3% of \$1,450,000 settlement in a pre-certification wage and hour class action);

g) *Walsh v. Cedars-Sinai Medical Center*, Los Angeles Superior Court, Case No. BC487290 (Hon. William F. Highberger – approving attorneys’ fees of 33-1/3% of \$500,000 settlement in a pre-certification wage and hour class action);

h) *Plimpton v. Gordon Trucking, Inc.*, San Bernardino Superior Court, Case No. CIV-DS-1511918 (Hon. Donald Alvarez – approving attorneys’ fees of 33-1/3% of \$3,750,000 settlement in a pre-certification wage and hour class action);

i) *Mena v. Wolfgang Puck Catering*, Los Angeles Superior Court, Case No. BC582743 (Hon. John Shepard Wiley, Jr. – approving attorneys’ fees of 33-1/3% of \$600,000 settlement in a pre-certification wage and hour class action);

j) *Syed v. M.I. Swaco*, USDC Eastern District of California, Case No. 12-CV-01718 DAD (Hon. Dale A. Drozd – approving fees of 33-1/3% of \$7,000,000 settlement in a pre-certification wage and hour class action);

k) *Magdaleno v. Shelly Automotive, LLC*, Orange Superior Court, Case No. 2013-0043958 (Hon. Kim. G. Dunning – approving attorneys’ fees of 33-1/3% of \$900,000 settlement in a pre-certification wage and hour class action);

l) *Grana v. PICO Enterprises, Inc.*, Los Angeles Superior Court, Case No. BC472891 (Hon. Stephanie M. Bowick – approving attorneys’ fees of 33-1/3% of \$1,500,000 settlement in a certified wage and hour class action);

1 m) *McGrath v. Wyndham*, USDC Southern District of California, Case No. 15-CV-
1631 JM (Hon. Jeffrey T. Miller – approving attorneys’ fees of 33-1/3% of \$7,250,000 settlement
2 in a pre-certification wage and hour class action)

3 n) *Arellano v. Container Connection*, Los Angeles Superior Court, Case No.
BC500675 (Hon. Ann I. Jones – approving attorneys’ fees of 33-1/3% of \$1,625,000 settlement in
4 a certified wage and hour class action);

5 o) *Nijmeh v. Bon Appetit*, Santa Clara Superior Court, Case No. 16CV294127 (Hon.
Thomas E. Kuhnle – approving attorneys’ fees of 33-1/3% of \$1,350,000 settlement in a pre-
6 certification wage and hour class action);

7 p) *Vaquero v. Stoneledge*, Los Angeles Superior Court, Case No. BC522676 (Hon.
Elihu M. Berle – approving attorneys’ fees of 33-1/3% of \$3,900,000 settlement in a certified
8 wage and hour class action);

9 q) *Gutierrez v. Save Mart Supermarkets*, San Mateo Superior Court, Case No
CIV530955 (Hon. Marie S. Weiner – approving attorneys’ fees of 33-1/3% of \$5,000,000
10 settlement in a certified wage and hour class action);

11 r) *Hernandez v. Workforce Enterprises WFE, Inc.*, Los Angeles Superior Court, Case
No. BC590913 (Hon. Elihu M. Berle – approving attorneys’ fees of 33-1/3% of \$778,000
12 settlement in a pre-certification wage and hour class action);

13 s) *Ramos v. Home Depot U.S.A., Inc.*, Alameda Superior Court, Case No.
RG15797737 (Hon. Da Ioana Petrou – approving attorneys’ fees of 33-1/3% of \$2,600,000
14 settlement in a PAGA action);

15 t) *Klein v. Loomis*, San Bernardino Superior Court, Case No. CIVDS1704547 (Hon.
David Cohn – approving attorneys’ fees of 33-1/3% of \$1,014,000 settlement in a pre-certification
16 wage and hour class action).

17 u) *Gutierrez v. Southern Counties Oil*, San Diego Superior Court, Case No. 2017-
00040850 (Hon. Ronald F. Frazier – approving attorneys’ fees of 33-1/3% of \$637,500 settlement
18 in a pre-certification wage and hour class action).

19 v) *Lawson v. Staples*, Los Angeles Superior Court, Case No. BC542237 (Hon.
Kenneth R. Freeman – approving attorneys’ fees of 33-1/3% of \$58,275 settlement in a pre-
20 certification wage and hour class action).

21 w) *Hanson v. Leisure Sports, Inc.*, Contra Costa Superior Court, Case No. MSC17-
00078 (Hon. Edward G. Weil – approving attorneys’ fees of 33-1/3% of \$200,000 settlement in a
22 pre-certification wage and hour class action).

23 x) *Horton v. Neostrata Company Inc., et al.*, USDC Southern District of California,
Case No. 16-CV-2189 JLB (Hon. Anthony J. Battaglia – approving attorneys’ fees of 33-1/3% of
24 \$355,000 settlement in a pre-certification wage and hour class action).

25 y) *Schaffer v. Rady Children’s Hospital – San Diego, et al.*, San Diego Superior
Court, Case No. 2015-00022978 (Hon. Joel R. Wohlfeil – approving attorneys’ fees of 33-1/3% of
26 \$12,500,000 settlement in a certified wage and hour class action).

27 z) *Hubbard v. Caliber Home Loans, Inc.*, Orange Superior Court, Case No. 2018-
01017838 (Hon. Glenda Sanders – approving attorneys’ fees of 33-1/3% of \$175,000 settlement
28 in a PAGA action).

1 aa) *Redin v. Accountabilities Professional Group, Et al.*, Orange Superior Court, Case
2 No. 2017-00929734 (Hon. Glenda Sanders –attorneys’ fees of 33-1/3% of \$255,000 settlement in
3 Class action).

4 bb) *White v. Sacramento Regional Transit District*, Sacramento Superior Court, Case
5 No. 234-2018-00240461 (Hon. David D. Alba –attorneys’ fees of 33-1/3% of \$385,000 settlement
6 in Class action).

7 cc) *Burris v. Resort Vacations, Inc.*, Orange County Superior Court, Case No. 30-
8 2018-00997260 (Hon. Randall J. Sherman –attorneys’ fees of 33-1/3% of \$1,485,000 settlement
9 in Class action).

10 dd) *Jimenez v. Reyes Holdings, LLC, et al.*, San Diego Superior Court, Case No. 37-
11 2019-00051577 (Hon. Joel R. Wohfeil –attorneys’ fees of 33-1/3% of \$216,666 settlement in
12 Class and Representative action).

13 ee) *Santos, et al. v. National General Management Corp.*, San Bernardino Superior
14 Court, Case No. CIVDS 1918865 (Hon. David Cohn –attorneys’ fees of 33-1/3% of \$680,000
15 settlement in PAGA action).

16 ff) *Loreto v. General Dynamics Information Technology, Inc.*, USDC Southern
17 District of California, Case No. 3:19-cv-01366-GPC-MSB (Hon. Gonzalo P. Curiel – approving
18 attorneys’ fees of 33-1/3% of \$900,000 settlement in a pre-certification wage and hour class
19 action).

20 gg) *Romanov v. Amazon Services LL.*, USDC Central District of California, Case No.
21 2:20-cv-02692-SB-KS (Hon. Stanley Blumenfeld, Jr. – approving attorneys’ fees of 33-1/3% of
22 \$700,000 settlement in a pre-certification wage and hour class action).

23 36. If this were a non-representative litigation, the customary fee arrangement would
24 be a contingent percentage basis in the range of one-third to 40% of recovery. Class Counsel’s fee
25 request is in line with, if not lower than, awards in similar cases. This also supports the request.

26 37. Unlike Defense counsel, who are regularly paid a fair-market hourly rate, Class
27 Counsel received no compensation for for over two years, and no reimbursement of expenses.
28 The contingent representation, and risks of the litigation, fully warrant approval of the fee request.

38. If Class Counsel’s fee award were calculated using the lodestar, rather than the
common fund method, a multiplier slightly more than 2 would be applied. (\$666,666/\$277,826 =
2.39). The time spent by Cohelan Khoury & Singer and Lebe Law, APLC on this case was
necessary, reasonable, and non-duplicative. Although two firms worked on the case, duplication
was minimized by a focus on different aspects of the litigation, with Lebe Law handling more tasks
to initiate the case and Cohelan Khoury & Singer focusing on developing theories for class
certification and proof of damages and mediating, settling and obtaining Court approval.

39. Class Counsel's skill and experience support their hourly rates and are in line with rates typically approved in California wage and hour class action litigation.

40. Cohelan Khoury & Singer's practice is limited exclusively to litigating class and representative actions on behalf of employees and consumers. Cohelan, Khoury & Singer has been appointed Class Counsel or co-Class Counsel in over 175 such cases.

41. As leading attorneys in the field, Class Counsel monitors prevailing market rates of defense and plaintiff firms and sets billing rates to follow attorneys and staff of comparable skill, qualifications and experience. Other Class and Representative Counsel before California courts charge comparable if not higher rates. Attached as Exhibit 4 is a true and correct copy of the National Law Journal survey of hourly billing rates for Partners and Associates for 2014.

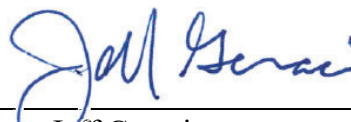
42. The Settlement allows Class Counsel to request up to \$12,500.00 in costs. Counsel seeks reimbursement of actual costs of \$10,657.85.

43. The settlement of PAGA penalties for \$50,000, of which \$37,500 (75%) will be paid to the LWDA and \$12,500 (25%) will remain with the Class Members, is reasonable and appropriate. The Parties negotiated a good faith amount for PAGA penalties, which was not the result of self-interest at the expense of Class Members.

44. The LWDA was provided with the Motion for Preliminary Approval and the fully-executed Agreement. The LWDA raised no objection to the amount of civil penalties. Attached as Exhibit 5 is a true and correct copy of the LWDA Confirmation of Receipt, October 26, 2021.

45. On the same date this motion and its exhibits are filed with the Court, they will be served on Defendant and provided to the LWDA via its website, www.dir.ca.gov/Private-Attorneys-General-Act/Private-Attorneys-General-Act, using the appropriate intake form. Attached as Exhibit 6 is a true and correct copy of the LWDA confirmation of Receipt.

I declare under the penalty of perjury under the laws of the State of California the foregoing is true and correct and this declaration is executed April 8, 2022, in San Diego, California.



Jeff Geraci

EXHIBIT 1

SUMMARY OF TIME AND COSTS

Kebede, et al. v. Wrike, Inc.

Santa Clara Superior Court Case No. 20CV366599

Total Attorneys' Hours: **414.8**
Total Lodestar Fees: **\$277,826.00**
Total Costs: **\$10,657.85**

FIRM/ ATTORNEYS	YEAR ADMITTED	HOURS	HOURLY RATE	TOTAL
COHELAN KHOURY & SINGER				
Isam C. Khoury	1974	2.0	\$900	\$ 1,800.00
Michael D. Singer	1974	26.6	\$900	\$ 23,940.00
Jeff Geraci	1990	163.8	\$790	\$129,402.00
Marta Manus (Former Associate)	2008	6.6	\$550	\$ 3,630.00
Amber Worden, Certified Paralegal	N/A	3.0	\$200	\$ 600.00
Matthew Atlas, Paralegal	N/A	17.7	\$170	\$ 3,009.00
COHELAN KHOURY & SINGER TOTAL:		219.7		\$162,381.00

FIRM/ ATTORNEYS	YEAR ADMITTED	HOURS	HOURLY RATE	TOTAL
LEBE LAW, APLC				
Jonathan M. Lebe	2015	102.6	\$700	\$ 71,820.00
Zachary Gershman	2019	72.5	\$450	\$ 32,625.00
LEBE LAW, APLC		175.1		\$ 104,445.00

Subtotal Aggregate Hours: 394.8	Subtotal Lodestar: \$266,826.00
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<i>Anticipated attorney time through the final approval process, including to attend final approval and supplemental hearings (if any), obtain supplemental administrator declarations, work with defense counsel and administrator re: unresolved claims; funding, distribution, tax forms, transmittal instruments, answer class member questions, etc.</i>	20.0	\$550	\$11,000.00
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Total Aggregate Hours:414.8	Total Lodestar: \$277,826.00
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LITIGATION EXPENSES	
Cohelan Khoury & Singer	\$ 10,469.72
Lebe Law, APLC	\$ 188.13
TOTAL COSTS	\$ 10,657.85

EXHIBIT 2

LODESTAR REPORT (As of April 8, 2022)

Firm Name: Cohelan Khoury & Singer

Categories:

(1) Investigation and Factual Research	(FP) Founding Partner
(2) Discovery	(P) Partner
(3) Pleadings, Briefs and Pretrial Motions (including Legal Research & Appearances)	(PL) Paralegal
(4) Mediation and Settlement	(FA) Former Associate
(5) Litigation Strategy, Analysis and Case Management	

ATTORNEY OR PARALEGAL	1	2	3	4	5	HOURS	HOURLY RATE	LODESTAR
Isam C. Khoury (FP)	0.0	0.0	0.0	2.0	0.0	2.0	\$900.00	\$1,800.00
Michael D. Singer (MP)	5.6	0.0	0.0	20.4	0.6	26.6	\$900.00	\$23,940.00
Jeff Geraci (P)	2.1	0.0	2.4	156.2	3.1	163.8	\$790.00	\$129,402.00
Marta Manus (FA)	0.7	0.0	3.1	0.0	2.8	6.6	\$550.00	\$3,630.00
Attorney Totals	8.4	0.0	5.5	178.6	6.5	199.0		\$158,772.00
Amber Worden (PL)	0.8	0.0	2.2	0.0	0.0	3.0	\$200.00	\$600.00
Matthew Atlas (PL)	0.0	0.0	3.4	11.6	2.7	17.7	\$170.00	\$3,009.00
Non-Attorney Totals	0.8	0.0	5.6	11.6	2.7	20.7		\$3,609.00
TOTALS:	9.2	0.0	11.1	190.2	9.2	219.7		\$162,381.00

EXHIBIT 3

COHELAN KHOURY SINGER

Litigation Costs

Kebede, et al. v. Wrike, Inc.

Santa Clara Superior Court Case No. 20CV366599

<u>Date</u>	<u>Payee</u>	<u>Details</u>	<u>Amount</u>
5/18/2020	Greenfiling	Complaint/Complex Fee	\$1,484.80
6/30/2020	Greenfiling	First Amended Complaint	\$6.75
7/22/2020	Greenfiling	Proof of Service of Summons	\$6.75
10/7/2020	Greenfiling	Notice of Appearance; Withdrawal	\$6.75
10/21/2020	Greenfiling	Notice of Posting Jury Fees	\$161.21
10/23/2020	Greenfiling	Joint Initial Status Statement	\$6.75
10/27/2020	Greenfiling	Third Amended Complaint	\$6.75
1/25/2021	Louis Marlin Mediation	Mediation Fee (3/24/21)	\$3,500.00
2/1/2021	Louis Marlin Mediation	Mediation Fee (Lebe) (3/24/21)	\$3,500.00
2/2/2021	Greenfiling	Stipulation to Continue CMC	\$29.41
4/1/2021	Berger Consulting, LLC	Consulting	\$1,275.00
5/4/2021	Greenfiling	Proposed Order to Continue CMC	\$29.41
7/30/2021	Greenfiling	Stipulation and Order	\$29.41
10/26/2021	Greenfiling	Preliminary Approval	\$70.61
11/11/2021	CourtCall	JG 12/1/21 Hearing	\$94.00
12/6/2021	Greenfiling	Revised Notice of Class Action Sett.	\$8.81
<i>Est.</i>	<i>Greenfiling</i>	<i>Final Approval Motion</i>	<i>\$70.61</i>
<i>Est.</i>	<i>CourtCall</i>	<i>Final Approval Hearing</i>	<i>\$94.00</i>
	In House	Postage	\$12.70
	In House	Photocopies (304@.25)	\$76.00
	Total:		\$10,469.72

EXHIBIT 4

2014 NLJ Billing Survey

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Year	Firm Name	Location	Average FTE Attorneys	Partner Billing Rate High	Partner Billing Rate Low	Partner Billing Rate Avg	Associate Billing Rate High	Associate Billing Rate Low	Associate Billing Rate Avg	Counsel Avg	Counsel Low	Counsel High	NLJ Billing Source	Notes
2014	Adams and Reese	New Orleans, LA	318	\$700.00	\$305.00	\$420.00	\$315.00	\$220.00	\$270.00	\$500.00	\$425.00	\$575.00	National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Akerman	Miami, FL	523	\$880.00	\$360.00	\$535.00	\$465.00	\$205.00	\$305.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Akin Gump Strauss Hauer & Feld	Washington, DC	809	\$1220.00	\$615.00	\$785.00	\$660.00	\$365.00	\$525.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Allen Matkins Leck Gamble Mallory & Natsis	Los Angeles, CA	181	\$680.00	\$525.00	\$615.00							National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Alston & Bird	Atlanta, GA	789	\$875.00	\$495.00	\$675.00	\$575.00	\$280.00	\$425.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Andrews Kurth	Houston, TX	337	\$1090.00	\$745.00	\$890.00	\$1090.00	\$265.00	\$670.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Archer & Greiner	Haddonfield, NJ	194	\$460.00	\$330.00	\$400.00	\$295.00	\$200.00	\$245.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Arent Fox	Washington, DC	330	\$860.00	\$500.00	\$650.00	\$595.00	\$275.00	\$395.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report

2014 NLJ Billing Survey

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2014	Arnall Golden Gregory	Atlanta, GA	140	\$520.00	\$430.00	\$490.00							National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Arnold & Porter	Washington, DC	720	\$950.00	\$670.00	\$815.00	\$610.00	\$345.00	\$500.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Arnstein & Lehr	Chicago, IL	144	\$595.00	\$350.00	\$465.00	\$350.00	\$175.00	\$250.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Baker & Hostetler	Cleveland, OH	798	\$670.00	\$275.00	\$449.00	\$350.00	\$210.00	\$272.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Baker & McKenzie	Chicago, IL	4087	\$1130.00	\$260.00	\$755.00	\$925.00	\$100.00	\$395.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Baker, Donelson, Bearman, Caldwell & Berkowitz	Memphis, TN	588	\$495.00	\$340.00	\$400.00	\$465.00	\$245.00	\$295.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Ballard Spahr	Philadelphia, PA	483	\$650.00	\$395.00	\$475.00	\$495.00	\$235.00	\$315.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Barnes & Thornburg	Indianapolis, IN	522	\$580.00	\$330.00	\$480.00	\$370.00	\$260.00	\$320.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Benesch, Friedlander, Coplan & Aronoff	Cleveland, OH	150	\$635.00	\$360.00	\$455.00	\$475.00	\$155.00	\$280.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Best Best & Krieger	Riverside, CA	176	\$655.00	\$340.00	\$455.00	\$385.00	\$235.00	\$280.00	\$439.83	\$340.00	\$595.00	National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report

2014 NLJ Billing Survey

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2014	Bingham McCutchen	Boston, MA	795	\$1080.00	\$220.00	\$795.00	\$605.00	\$185.00	\$450.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Blank Rome	Philadelphia, PA	447	\$940.00	\$445.00	\$640.00	\$565.00	\$175.00	\$350.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Bond, Schoeneck & King	Syracuse, NY	198	\$520.00	\$240.00	\$355.00	\$310.00	\$160.00	\$225.00	\$360.00	\$275.00	\$485.00	National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Bowles Rice	Charleston, WV	140	\$285.00	\$165.00	\$230.00	\$180.00	\$115.00	\$135.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Bracewell & Giuliani	Houston, TX	441	\$1125.00	\$575.00	\$760.00	\$700.00	\$275.00	\$440.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Bradley Arant Boult Cummings	Birmingham, AL	413	\$605.00	\$325.00	\$430.00	\$340.00	\$200.00	\$260.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Broad and Cassel	Orlando, FL	150	\$465.00	\$295.00	\$380.00							National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Brown Rudnick	Boston, MA	187	\$1045.00	\$650.00	\$856.00							National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Brownstein Hyatt Farber Schreck	Denver, CO	214	\$700.00	\$310.00	\$520.00	\$345.00	\$265.00	\$305.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Bryan Cave	St. Louis, MO	985	\$900.00	\$410.00	\$620.00	\$595.00	\$220.00	\$405.00	\$635.00	\$355.00	\$865.00	National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report

2014 NLJ Billing Survey

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2014	Buchalter Nemer	Los Angeles, CA	139	\$695.00	\$475.00	\$605.00	\$375.00	\$350.00	\$365.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Burr & Forman	Birmingham, AL	261	\$525.00	\$300.00	\$371.00	\$275.00	\$200.00	\$241.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Butler Snow	Ridgeland, MS	280	\$335.00	\$235.00	\$302.00							National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Cadwalader, Wickersham & Taft	New York, NY	437	\$1050.00	\$800.00	\$930.00	\$750.00	\$395.00	\$605.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Carlton Fields	Tampa, FL	272	\$840.00	\$455.00	\$600.00							National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Cole, Schotz, Meisel, Forman & Leonard	Hackensack, NJ	118	\$730.00	\$590.00	\$653.00	\$340.00	\$275.00	\$302.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Connell Foley	Roseland, NJ	129	\$575.00	\$275.00	\$425.00	\$325.00	\$200.00	\$265.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Cooley	Palo Alto, CA	673	\$990.00	\$660.00	\$820.00	\$640.00	\$335.00	\$515.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Covington & Burling	Washington, DC	760	\$890.00	\$605.00	\$780.00	\$565.00	\$320.00	\$415.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Cozen O'Connor	Philadelphia, PA	495	\$1135.00	\$275.00	\$570.00	\$640.00	\$180.00	\$355.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report

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2014	Curtis, Mallet-Prevost, Colt & Mosie	New York, NY	323	\$860.00	\$730.00	\$800.00	\$785.00	\$345.00	\$480.00					National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Davis Graham & Stubbs	Denver, CO	145	\$635.00	\$315.00	\$435.00	\$350.00	\$200.00	\$255.00					National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Davis Polk & Wardwell	New York, NY	810	\$985.00	\$850.00	\$975.00	\$975.00	\$130.00	\$615.00					National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Debevoise & Plimpton	New York, NY	595	\$1075.00	\$955.00	\$1055.00	\$760.00	\$120.00	\$490.00					National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Dechert	New York, NY	845	\$1095.00	\$670.00	\$900.00	\$735.00	\$395.00	\$530.00					National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Dentons	New York, NY	2503	\$1050.00	\$345.00	\$700.00	\$685.00	\$210.00	\$425.00					National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Dickstein Shapiro	Washington, DC	254	\$1250.00	\$590.00	\$750.00	\$585.00	\$310.00	\$475.00					National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Dinsmore & Shohl	Cincinnati, OH	415	\$850.00	\$250.00	\$411.00	\$365.00	\$160.00	\$238.00	\$360.00	\$150.00	\$615.00		National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	DLA Piper	New York, NY	3962	\$1025.00	\$450.00	\$765.00	\$750.00	\$250.00	\$510.00					National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Dorsey & Whitney	Minneapolis, MN	501	\$585.00	\$340.00	\$435.00	\$510.00	\$215.00	\$315.00					National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report

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2014	Duane Morris	Philadelphia, PA	613	\$960.00	\$415.00	\$589.00	\$585.00	\$280.00	\$373.00	\$638.00	\$460.00	\$1015.00	National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Edwards Wildman Palmer	Boston, MA	540	\$765.00	\$210.00	\$535.00	\$415.00	\$245.00	\$325.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Faegre Baker Daniels	Minneapolis, MN	673	\$580.00	\$355.00	\$455.00	\$315.00	\$110.00	\$260.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Foley & Lardner	Milwaukee, WI	844	\$860.00	\$405.00	\$600.00	\$470.00	\$210.00	\$335.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Foley Hoag	Boston, MA	221	\$775.00	\$590.00	\$670.00	\$385.00	\$290.00	\$325.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Fox Rothschild	Philadelphia, PA	531	\$750.00	\$335.00	\$530.00	\$500.00	\$245.00	\$310.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Fried, Frank, Harris, Shriver & Jacobson	New York, NY	450	\$1100.00	\$930.00	\$1000.00	\$760.00	\$375.00	\$595.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Frost Brown Todd	Cincinnati, OH	414	\$600.00	\$220.00	\$387.00	\$315.00	\$150.00	\$234.00	\$417.00	\$350.00	\$540.00	National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Gardere Wynne Sewell	Dallas, TX	218	\$775.00	\$430.00	\$635.00	\$330.00	\$290.00	\$303.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Gibbons	Newark, NJ	201	\$865.00	\$440.00	\$560.00	\$475.00	\$295.00	\$360.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report

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2014	Gibson, Dunn & Crutcher	New York, NY	1154	\$1800.00	\$765.00	\$980.00	\$930.00	\$175.00	\$590.00					National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Gordon Rees Scully Mansukhani	San Diego, CA	478	\$475.00	\$375.00	\$420.00	\$325.00	\$285.00	\$300.00					National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Greenberg Traurig	New York, NY	1690	\$955.00	\$535.00	\$763.00	\$570.00	\$325.00	\$470.00					National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Harris Beach	Rochester, NY	198	\$400.00	\$298.00	\$348.00	\$285.00	\$175.00	\$230.00	\$287.50	\$175.00	\$400.00		National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Harter Secrest & Emery	Rochester, NY	132	\$465.00	\$300.00	\$385.00	\$290.00	\$195.00	\$250.00					National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Haynes and Boone	Dallas, TX	483	\$1020.00	\$450.00	\$670.00	\$580.00	\$310.00	\$405.00					National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Hogan Lovells	Washington, DC	2313	\$1000.00	\$705.00	\$835.00								National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Holland & Hart	Denver, CO	423	\$725.00	\$305.00	\$442.00	\$425.00	\$175.00	\$277.00	\$363.00	\$225.00	\$535.00		National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Holland & Knight	Washington, DC	956	\$1085.00	\$355.00	\$625.00	\$595.00	\$210.00	\$340.00	\$575.00	\$420.00	\$910.00		National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Honigman Miller Schwartz and Cohn	Detroit, MI	231	\$560.00	\$290.00	\$390.00	\$225.00	\$205.00	\$220.00					National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report

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2014	Hughes Hubbard & Reed	New York, NY	351	\$995.00	\$725.00	\$890.00	\$675.00	\$365.00	\$555.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Husch Blackwell	St. Louis, MO	539	\$785.00	\$250.00	\$449.00	\$440.00	\$190.00	\$275.00	\$418.00	\$240.00	\$625.00	National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Ice Miller	Indianapolis, IN	291	\$530.00	\$335.00	\$450.00	\$305.00	\$245.00	\$270.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Irell & Manella	Los Angeles, CA	166	\$975.00	\$800.00	\$890.00	\$750.00	\$395.00	\$535.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Jackson Kelly	Charleston, WV	179	\$535.00	\$270.00	\$345.00	\$315.00	\$200.00	\$243.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Jackson Lewis	Los Angeles, CA	724	\$440.00	\$310.00	\$380.00	\$315.00	\$275.00	\$290.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Jackson Walker	Dallas, TX	333	\$675.00	\$575.00	\$622.00	\$385.00	\$255.00	\$335.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Jeffer, Mangels, Butler & Mitchell	Los Angeles, CA	125	\$875.00	\$560.00	\$690.00							National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Jenner & Block	Chicago, IL	434	\$925.00	\$565.00	\$745.00	\$550.00	\$380.00	\$465.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Jones Day	New York, NY	2464	\$975.00	\$445.00	\$745.00	\$775.00	\$205.00	\$435.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report

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2014	Jones Walker	New Orleans, LA	363	\$425.00	\$275.00	\$385.00	\$240.00	\$200.00	\$225.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Kasowitz, Benson, Torres & Friedman	New York, NY	372	\$1195.00	\$600.00	\$835.00	\$625.00	\$200.00	\$340.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Katten Muchin Rosenman	Chicago, IL	612	\$745.00	\$500.00	\$615.00	\$595.00	\$340.00	\$455.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Kaye Scholer	New York, NY	392	\$1250.00	\$725.00	\$860.00	\$795.00	\$370.00	\$597.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Kelley Drye & Warren	New York, NY	293	\$815.00	\$435.00	\$640.00	\$600.00	\$305.00	\$430.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Kilpatrick Townsend & Stockton	Atlanta, GA	561	\$775.00	\$400.00	\$550.00	\$475.00	\$315.00	\$385.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	King & Spalding	Atlanta, GA	874	\$995.00	\$545.00	\$775.00	\$735.00	\$125.00	\$460.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Kirkland & Ellis	Chicago, IL	1554	\$995.00	\$590.00	\$825.00	\$715.00	\$235.00	\$540.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Knobbe Martens Olson & Bear	Irvine, CA	260	\$810.00	\$450.00	\$575.00	\$455.00	\$305.00	\$360.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Kramer Levin Naftalis & Frankel	New York, NY	313	\$1100.00	\$745.00	\$921.00	\$815.00	\$515.00	\$675.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report

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2014	Lane Powell	Seattle, WA	170	\$675.00	\$375.00	\$516.00	\$425.00	\$260.00	\$331.00	\$477.00	\$300.00	\$650.00	National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Latham & Watkins	New York, NY	2060	\$1110.00	\$895.00	\$990.00	\$725.00	\$465.00	\$605.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Lathrop & Gage	Kansas City, MO	283	\$700.00	\$285.00	\$420.00	\$375.00	\$195.00	\$250.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Lewis Roca Rothgerber	Phoenix, AZ	228	\$695.00	\$380.00	\$505.00	\$525.00	\$205.00	\$400.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Lindquist & Vennum	Minneapolis, MN	178	\$600.00	\$460.00	\$520.00	\$470.00	\$275.00	\$365.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Littler Mendelson	San Francisco, CA	1002	\$615.00	\$395.00	\$550.00	\$420.00	\$245.00	\$290.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Lowenstein Sandler	Roseland, NJ	261	\$990.00	\$600.00	\$765.00	\$650.00	\$300.00	\$450.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Manatt, Phelps & Phillips	Los Angeles, CA	329	\$795.00	\$640.00	\$740.00							National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	McCarter & English	Newark, NJ	371	\$625.00	\$450.00	\$530.00	\$370.00	\$220.00	\$300.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	McDermott Will & Emery	Chicago, IL	1021	\$835.00	\$525.00	\$710.00							National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report

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2014	McElroy, Deutsch, Mulvaney & Carpenter	Morristown, NJ	274	\$560.00	\$325.00	\$445.00	\$335.00	\$200.00	\$295.00					National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	McGuireWoods	Richmond, VA	931	\$725.00	\$450.00	\$595.00	\$525.00	\$285.00	\$360.00					National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	McKenna Long & Aldridge	Atlanta, GA	518	\$650.00	\$480.00	\$530.00	\$425.00	\$375.00	\$395.00					National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Michael, Best & Friedrich	Milwaukee, WI	189	\$650.00	\$235.00	\$445.00	\$425.00	\$200.00	\$283.00					National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Miles & Stockbridge	Baltimore, MD	226	\$740.00	\$340.00	\$478.00	\$425.00	\$230.00	\$290.00	\$419.00	\$225.00	\$695.00		National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Moore & Van Allen	Charlotte, NC	274	\$870.00	\$315.00	\$490.00	\$430.00	\$190.00	\$280.00					National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Morgan, Lewis & Bockius	Philadelphia, PA	1363	\$765.00	\$430.00	\$620.00	\$585.00	\$270.00	\$390.00					National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Morris, Manning & Martin	Atlanta, GA	148	\$575.00	\$400.00	\$480.00								National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Morrison & Foerster	San Francisco, CA	1020	\$1195.00	\$595.00	\$865.00	\$725.00	\$230.00	\$525.00					National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Nelson Mullins	Columbia, SC	466	\$800.00	\$250.00	\$444.00	\$395.00	\$215.00	\$271.00	\$376.00	\$195.00	\$600.00		National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report

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2014	Nixon Peabody	Boston, MA	584	\$850.00	\$295.00	\$520.00	\$550.00	\$180.00	\$300.00					National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Norris McLaughlin & Marcus	Bridgewater, NJ	128	\$505.00	\$485.00	\$495.00	\$365.00	\$185.00	\$275.00					National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Norton Rose Fulbright	Houston, TX	3537	\$900.00	\$525.00	\$775.00	\$515.00	\$300.00	\$400.00					National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Nossaman	Los Angeles, CA	148	\$800.00	\$370.00	\$579.00	\$490.00	\$255.00	\$340.00	\$495.00	\$440.00	\$550.00		National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Nutter McClennen & Fish	Boston, MA	146	\$715.00	\$470.00	\$575.00	\$460.00	\$295.00	\$375.00					National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Ogletree Deakins	Atlanta, GA	668	\$650.00	\$250.00	\$360.00	\$365.00	\$200.00	\$260.00	\$315.00	\$230.00	\$555.00		National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	O'Melveny & Myers	Los Angeles, CA	721	\$950.00	\$615.00	\$715.00								National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Orrick Herrington & Sutcliffe	New York, NY	954	\$1095.00	\$715.00	\$845.00	\$375.00	\$710.00	\$560.00	\$735.00	\$685.00	\$850.00		National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Parker Poe Adams & Bernstein	Charlotte, NC	185	\$500.00	\$425.00	\$450.00								National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Paul Hastings	New York, NY	889	\$900.00	\$750.00	\$815.00	\$755.00	\$335.00	\$540.00					National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report

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2014	Paul, Weiss, Rifkind, Wharton & Garrison	New York, NY	854	\$1120.00	\$760.00	\$1040.00	\$735.00	\$595.00	\$678.00					National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Pepper Hamilton	Philadelphia, PA	510	\$950.00	\$465.00	\$645.00	\$525.00	\$280.00	\$390.00					National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Perkins Coie	Seattle, WA	861	\$1000.00	\$330.00	\$615.00	\$610.00	\$215.00	\$425.00	\$635.00	\$280.00	\$800.00		National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Pillsbury Winthrop Shaw Pittman	Washington, DC	591	\$1070.00	\$615.00	\$865.00	\$860.00	\$375.00	\$520.00					National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Polsinelli	Kansas City, MO	616	\$775.00	\$325.00	\$435.00	\$350.00	\$235.00	\$279.00	\$376.00	\$300.00	\$450.00		National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Proskauer Rose	New York, NY	712	\$950.00	\$725.00	\$880.00	\$675.00	\$295.00	\$465.00					National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Quarles & Brady	Milwaukee, WI	422	\$625.00	\$425.00	\$519.00	\$600.00	\$210.00	\$335.00					National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Quinn Emanuel Urquhart & Sullivan	New York, NY	673	\$1075.00	\$810.00	\$915.00	\$675.00	\$320.00	\$410.00					National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Reed Smith	Pittsburgh, PA	1555	\$890.00	\$605.00	\$737.00	\$530.00	\$295.00	\$420.00					National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Richards, Layton & Finger	Wilmington, DE	124	\$800.00	\$600.00	\$678.00	\$465.00	\$350.00	\$414.00					National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report

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2014	Riker Danzig Scherer Hyland & Perretti	Morristown, NJ	146	\$495.00	\$430.00	\$455.00	\$295.00	\$210.00	\$250.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Robinson & Cole	Hartford, CT	201	\$700.00	\$295.00	\$500.00	\$445.00	\$215.00	\$300.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Rutan & Tucker	Costa Mesa, CA	147	\$675.00	\$345.00	\$490.00	\$500.00	\$230.00	\$320.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Saul Ewing	Philadelphia, PA	240	\$875.00	\$375.00	\$546.00	\$590.00	\$225.00	\$344.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Schiff Hardin	Chicago, IL	317				\$415.00	\$250.00	\$333.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Sedgwick	San Francisco, CA	342	\$615.00	\$305.00	\$425.00	\$475.00	\$250.00	\$325.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Seward & Kissel	New York, NY	143	\$850.00	\$625.00	\$735.00	\$600.00	\$290.00	\$400.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Seyfarth Shaw	Chicago, IL	779	\$860.00	\$375.00	\$610.00	\$505.00	\$225.00	\$365.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Sheppard Mullin Richter & Hampton	Los Angeles, CA	549	\$875.00	\$490.00	\$685.00	\$535.00	\$275.00	\$415.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Shumaker Loop & Kendrick	Toledo, OH	224	\$595.00	\$305.00	\$413.00	\$330.00	\$160.00	\$256.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report

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2014	Shutts & Bowen	Miami, FL	230	\$660.00	\$250.00	\$430.00	\$345.00	\$195.00	\$260.00					National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Skadden, Arps, Slate, Meagher & Flom	New York, NY	1664	\$1150.00	\$845.00	\$1035.00	\$845.00	\$340.00	\$620.00					National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Snell & Wilmer	Phoenix, AZ	411	\$845.00	\$325.00	\$525.00	\$470.00	\$180.00	\$280.00					National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Spilman Thomas & Battle	Charleston, WV	131							\$280.00	\$215.00	\$350.00		National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Squire Patton Boggs			\$950.00	\$350.00	\$655.00	\$530.00	\$250.00	\$355.00					National Law Journal, December 2014	Location data not available due to merger in 2014. Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Sterne, Kessler, Goldstein & Fox	Washington, DC	122	\$795.00	\$450.00	\$577.00	\$470.00	\$265.00	\$346.00	\$483.57	\$450.00	\$520.00		National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Stevens & Lee	Reading, PA	154	\$800.00	\$525.00	\$625.00								National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Stoel Rives	Portland, OR	365	\$800.00	\$300.00	\$492.00	\$465.00	\$205.00	\$287.00	\$312.00	\$280.00	\$510.00		National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Strasburger & Price	Dallas, TX	217	\$690.00	\$290.00	\$435.00	\$365.00	\$210.00	\$270.00	\$475.00	\$300.00	\$690.00		National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Stroock & Stroock & Lavan	New York, NY	285	\$1125.00	\$675.00	\$960.00	\$840.00	\$350.00	\$549.00	\$979.00	\$745.00	\$1095.00		National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report

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2014	Taft Stettinius & Hollister	Cincinnati, OH	357	\$535.00	\$285.00	\$415.00	\$475.00	\$200.00	\$285.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Thompson & Knight	Dallas, TX	290	\$740.00	\$425.00	\$535.00	\$610.00	\$240.00	\$370.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Thompson Coburn	St. Louis, MO	317	\$510.00	\$330.00	\$440.00	\$350.00	\$220.00	\$270.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Troutman Sanders	Atlanta, GA	567	\$975.00	\$400.00	\$620.00	\$570.00	\$245.00	\$340.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Ulmer & Berne	Cleveland, OH	178	\$415.00	\$315.00	\$380.00							National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Varnum	Grand Rapids, MI	133	\$465.00	\$290.00	\$390.00							National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Venable	Washington, DC	533	\$1075.00	\$470.00	\$660.00	\$575.00	\$295.00	\$430.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Vinson & Elkins	Houston, TX	650	\$770.00	\$475.00	\$600.00	\$565.00	\$275.00	\$390.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Waller Lansden Dortch & Davis	Nashville, TN	178	\$600.00	\$350.00	\$460.00	\$335.00	\$190.00	\$245.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Weil, Gotshal & Manges	New York, NY	1157	\$1075.00	\$625.00	\$930.00	\$790.00	\$300.00	\$600.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report

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2014	White & Case	New York, NY	1895	\$1050.00	\$700.00	\$875.00	\$1050.00	\$220.00	\$525.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Wiley Rein	Washington, DC	277	\$950.00	\$550.00	\$665.00	\$535.00	\$320.00	\$445.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Williams Mullen	Richmond, VA	233	\$410.00	\$360.00	\$385.00	\$350.00	\$260.00	\$295.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Willkie Farr & Gallagher	New York, NY	526	\$1090.00	\$790.00	\$950.00	\$790.00	\$350.00	\$580.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Wilmer Cutler Pickering Hale and Dorr	Washington, DC	988	\$1250.00	\$735.00	\$905.00	\$695.00	\$75.00	\$290.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Winston & Strawn	Chicago, IL	822	\$995.00	\$650.00	\$800.00	\$590.00	\$425.00	\$520.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Wolff & Samson	West Orange, NJ	125	\$450.00	\$325.00	\$400.00	\$450.00	\$225.00	\$340.00				National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Womble Carlyle Sandridge & Rice	Winston-Salem, NC	492	\$640.00	\$470.00	\$554.00							National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report
2014	Wyatt Tarrant & Combs	Louisville, KY	202	\$500.00	\$280.00	\$418.00							National Law Journal, December 2014	Full-time equivalent (FTE) attorneys at the firm and the city of the firm's largest U.S. office as listed in the 2014 NLJ 350 report

2014 Associate Class Billing Survey

EXHIBIT 5

From: [FormAssembly](#) on behalf of [DIR PAGA Unit](#)
To: [Matthew Atlas](#)
Subject: [External] Thank you for your Proposed Settlement Submission
Date: Tuesday, October 26, 2021 4:08:48 PM

10/26/2021 04:08:22 PM

Thank you for your submission to the Labor and Workforce Development Agency.

Item submitted: Proposed Settlement

If you have questions or concerns regarding this submission or your case, please send an email to pagainfo@dir.ca.gov.

DIR PAGA Unit on behalf of
Labor and Workforce Development Agency

Website: https://urldefense.proofpoint.com/v2/url?u=http-3A__labor.ca.gov_Private-5FAttorneys-5FGeneral-5FAct.htm&d=DwIFaQ&c=euGZstcaTDllvimEN8b7jXrwqOf-v5A_CdpqnVfiiMM&r=CkmVEddukKLexsqU9o1LOYeca1vZAEC-MO6PZ1f0-Jc&m=3FsWLhgqVb9_E73nykTkCu-gWKVzmm6eLfiW6WhzTow&s=XbitHad_e7lXs_gNCC8PnMhjEEed8Q8KoSh66JKo474&e=

EXHIBIT 6