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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SACRAMENTO

ALONZO SMITH, Dawn Williams, and
ROMERO REYES, as individuals and on behalf
of all others similarly situated, and as private
attorneys general,

Plaintiffs,

vs.

CLEAN HARBORS ENVIRONMENTAL
SERVICES, INC., a Massachusetts corporation;
and DOES 1 through 50, inclusive,

Defendant.

Case No.: 34-2021-00292526

CLASS ACTION

**DECLARATION OF MELISSA A.
HUETHER IN SUPPORT OF
PLAINTIFFS' MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

Hearing Information

Date: March 10, 2023

Time: 9:00 a.m.

Dept: 28

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Attorneys for Plaintiff Reyes

DECLARATION OF MELISSA A. HUETHER

I, Melissa A. Huether, declare:

1. I am an attorney licensed to practice law in the state of California and have been admitted to practice before this Court. I am an associate attorney with the law firm Lavi & Ebrahimiian, LLP, counsel for Plaintiff Romero Reyes ("Plaintiff Reyes"), and I am an attorney assigned to work on this case. I have personal knowledge of the matters stated herein and if called and sworn as a witness, I would and could competently testify under oath thereto. I am a member in good standing of the bar of the State of California and all state and federal Courts in California.

2. This Declaration is submitted in support of Plaintiffs' Motion for Final Approval of Class Action Settlement.

3. Based on the documents and data reviewed, and the experience of Mr. Lavi and other attorneys at Lavi & Ebrahimiian, LLP, counsel for Plaintiff Romero Reyes believes the settlement reached is a fair, reasonable, and adequate result for the class members involved and should be approved by the Court.

EXPERIENCE OF CLASS COUNSEL

4. Lavi & Ebrahimiian, LLP is experienced and qualified to act as Class Counsel, to evaluate the class claims, to evaluate settlement versus trial on a fully informed basis, and to evaluate the viability of the defenses.

5. I, and the law firm of Lavi & Ebrahimiian, LLP, have exclusively practiced in the area of labor and employment law.

6. I graduated from Loyola Law School, Los Angeles in 2017. I have been in practice with the law firm of Lavi & Ebrahimiian, LLP since April 2021, focusing almost exclusively in the area of employment law and specifically wage and hour class actions. Prior to joining Lavi & Ebrahimiian, I litigated exclusively wage and hour class and PAGA actions on behalf of employees throughout California. I have been involved in numerous cases in all aspects from pre-filing through settlement, including California and Federal class actions, PAGA representative actions, and collective actions.

7. I am also familiar with the practice of Lead Counsel Joseph Lavi having worked as an associate with Lavi & Ebrahimiian, LLP since April 2021, which has included reviewing Mr. Lavi's

1 declarations in support of motions for attorneys' fees and/or to seek appointment as Class Counsel.
2 Mr. Lavi graduated from law school in 2000 and has handled numerous cases in all aspects of
3 employment and labor law, including state and federal class actions, wrongful termination,
4 discrimination, harassment and retaliation cases. Mr. Lavi has tried employment cases in State and
5 Federal court, and has argued before various Courts of Appeals, on employment issues such as
6 validity of Arbitration Agreements, Application of Res Judicata in class action cases, and other
7 employment issues. Mr. Lavi has been a panelist and/or speaker for various Employment Law
8 Continuing Legal Education Panels on issues of employment law trials, how to proceed and conduct
9 trials, and proving and winning punitive damages. Mr. Lavi has been named a Southern California
10 Super Lawyer in the area of Plaintiff's employment litigation for Class Actions from 2011-2022. Mr.
11 Lavi has settled dozens of wage and hour class actions and is currently Plaintiff's counsel in many
12 others. Some of the class actions that Mr. Lavi has handled against employers on wage and hour
13 issues and have been approved as class counsel include cases against the following: Kaiser
14 Permanente which settled for \$6,510,000.00; Hustler Casino which settled for \$980,000.00; Chevron
15 Stations Inc., which settled for \$4,500,000.00; Commerce Casino which settled for \$1,575,000.00;
16 BP West Cost Products, which settled for \$4,000,000.00; Kaiser Permanente which settled for
17 \$3,600,000.00, Fuddruckers (as lead counsel) which settled for \$900,000.00; Movado Retail Group,
18 Inc. (as lead counsel) which settled for \$728,000.00, Chuck-E-Cheese's (as lead counsel) which
19 settled for \$1,900,000.00; Aero-Electric Connector, Inc. (as lead counsel) which settled for
20 \$1,500,000.00; Clougherty Packing, LLC (as lead counsel) which settled for \$4,250,000.00; and
21 Gruma Corporation (as lead counsel) which Defendants' petition to the United States Supreme Court
22 in the matter was denied and the matter settled for \$2,300,000.00. Mr. Lavi has been approved as
23 class counsel by both Federal and California Courts. Mr. Lavi and the other attorneys at Lavi &
24 Ebrahimian who are available to assist me in this case if needed are fully capable of adequately and
fairly representing Plaintiff and the proposed class in this matter.

25 8. Lavi & Ebrahimian, LLP, and has been appointed Class Counsel in over fifty contested
26 proceedings including the following:

27 a. *Ischak v. Kaiser Foundation Hospitals, Inc.*, Los Angeles Superior Court Case No.
28 BC343535;

- 1 b. *Santana v. El Pollo Loco, Inc.*, Los Angeles Superior Court Case No. BC369846;
- 2 c. *Edlin, et al. v. Fuddruckers, Inc.*, United States District Court, Central District of
3 California, Case No. CV-07-3678-ABC;
- 4 d. *Chavez, et al. vs. CEC Entertainment, Inc. d/b/a Chukee-Cheeses*, Los Angeles
5 Superior Court Case No. BC380996;
- 6 e. *Bustamante, et al. v. Teamone Employment Specialists*, Los Angeles Superior Court
7 Case No. BC383266;
- 8 f. *Cervantes, et al. v. Kaiser Foundation Hospitals, Inc.*, Alameda Superior Court Case
9 No. RG 0265835;
- 10 g. *Seng Savang v. Club One Casino*; Fresno Superior Court Case No. 05CECG02189;
- 11 h. *Norman, et al. v. Movado Retail Group, Inc.*, United States District Court, Central
12 District of California, Case No. CV08-06691 SVW (PLA)
- 13 i. *Shand v. G.A.L.A., Inc. dba Giorgio Armani*, Los Angeles Superior Court Case No.
14 BC342588;
- 15 g. *Solis v. Plycraft Industries, Inc.*, Los Angeles Superior Court Case No. BC374816;
- 16 h. *Campos v. HWB Carwash, Inc.*, Los Angeles Superior Court Case No. BC378990;
- 17 i. *Acosta, et al. v. Texwood Industries*, United States District Court, Central District of
18 California, Case No. CV07-3237-DDP (PLAX);
- 19 h. *Arevalo v. Gruma Corporation*, Los Angeles Superior Court Case No. BC410322;
- 20 j. *Burrola v. American Promotional Events*, Los Angeles Superior Court Case No.
21 BC412315;
- 22 k. *Cortez v. Trader Distribution Services*, Los Angeles Superior Court Case No.
23 BC397208;
- 24 l. *Cueva v. Allied Industries, Inc.*, Los Angeles Superior Court Case No. BC399431;
- 25 m. *Del Toro v. Petco Animal Supplies, Inc.*, San Diego Superior Court Case No. 37-2009-
26 00103626-CU-OE-CTL;
- 27 n. *Garcia v. Home Cooking, Inc.*, Los Angeles Superior Court Case No. BC451148;
- 28 o. *Alcantar v. Amerimax Building Products, Inc.*, United States District Court, Central

1 District of California, Case No. CV 10-8916 DDP (CWx);

2 p. *Arancivias v. Clougherty Packaging, LLC dba Farmer John*, Los Angeles Superior
3 Court Case No. BC432406;

4 q. *Barajas v. Menzies Aviation, Inc.*, United States District Court, Central District of
5 California, Case No CV-10-02315-JEM;

6 r. *Barrera v. BHFC Operating, LLC dba Bottega Louie*, Los Angeles Superior Court
7 Case No. BC462603;

8 s. *Camacho v. American Textile Maintenance Co.*, Los Angeles Superior Court Case
9 No. BC452570;

10 t. *Cortes v. Monsanto Company*, Ventura Superior Court Case No. 56-2010-00366952-
11 CU-OE-VTA;

12 u. *Escobar v. Aero-Electric Connector, Inc.*, Los Angeles Superior Court Case No.
13 BC421009;

14 v. *Gomez v. Bacara Resort & Spa*, Santa Barbara Superior Court Case No. 1341987;

15 w. *Gonzalez v. Ashley Furniture Industries, Inc.*, Los Angeles Superior Court Case No.
16 BC425708

17 x. *Gonzalez v. Burrtec Waste Industries, Inc.*, Los Angeles Superior Court Case No.
18 BC436879;

19 y. *Gutierrez v. Visterra Credit Union*, Riverside Superior Court Case No. RIC10020183;

20 z. *Hernandez v. Kruse & Son, Inc.*, Los Angeles Superior Court Case No. BC411849;

21 aa. *Lopez v. Tecno Industrial Engineering*, Los Angeles Superior Court Case No.
22 BC411134;

23 bb. *Lowanga v. Continental Currency Services, Inc.*, Orange County Superior Court Case
24 No. 30-2011-0044011-CU-OE-CXC;

25 cc. *Aguilar v. PLS Financial Services, Inc.*, United States District Court, Central District
26 of California, Case No. CV 10-0415 ODW (FMOx)

27 dd. *Lozada v. Classic Party Rentals, Inc.*, Los Angeles Superior Court Case No.
28 BC443792;

1 ee. *Madrid v. OPI Products, Inc.*, Los Angeles Superior Court Case No. BC451489;
2 ff. *Martinez v. J. Fletcher Creamer & Son, Inc.*, United States District Court Case No.
3 CV 10-0968-PSG-FMOX;
4 gg. *Martinez v. Administaff Companies II, L.P.*, Los Angeles Superior Court Case No.
5 BC425799;
6 hh. *Martinez v. Morgans Hotel Group Management, LLC*, Los Angeles Superior Court
7 Case No. BC446744;
8 jj. *Sanchez v. La Brea Bakery, Inc.*, Los Angeles Superior Court Case No. BC456420;
9 ii. *Montenegro v. Ruggeri Marble and Granite, Inc.*, United States District Court, Central
10 District of California, Case No. CV-10-00711 JFW (PLAx);
11 kk. *Reed v. 99 Cents Only Stores*, Los Angeles Superior Court Case No. BC436793;
12 ll. *Santos v. Noble Management Group-California, LLC*, United States District Court,
13 Central District of California, Case No. CV 10-2594 DSF (VBKx)
14 mm. *Taylor v. U.S. Healthworks Holding Company, Inc.*, Orange County Superior Court
15 Case No. 30-2011-00473505;
16 nn. *Valencia Diaz v. Gene Wheeler Farms, Inc.*, Los Angeles Superior Court Case No.
17 BC436235;
18 oo. *Zad-Behtooie v. Valley Village*, Los Angeles Superior Court Case No. BC451490;
19 pp. *Bell v. Aidells Sausage Company, Inc.*, Alameda Superior Court Case No.
20 RG10523946;
21 qq. *Negrete v. Cenveo, Inc.*, United States District Court, Central District of California,
22 Case No. CV 11-09543 DSF (MRWx);
23 rr. *Bejar v. Exopack-Ontario, Inc.*, Orange County Superior Court Case No. 30-2011-
24 00518396-CU-OE-CXC;
25 ss. *Aguilar v. PLS Financial Services, Inc.*, United States District Court, Central District
26 of California, Case No. CV 10-0415 ODW (FMOx);
27 tt. *Sparks v. Larry Flynt dba Hustler Casino*, Los Angeles Superior Court Case No.
28 BC320172;

1 uu. *Morris v. Chevron Stations, Inc.*, Los Angeles Superior Court Case No. BC361380;
2 vv. *Marino v. BP West Coast Products, LLC*, Los Angeles Superior Court Case No.
3 BC357987.

4 CONTRIBUTION OF PLAINTIFF REYES AND REASONABLENESS OF THE
5 REQUESTED SERVICE AWARD

6 9. It is imperative that Plaintiff Reyes obtain just compensation for the time, effort and
7 risk associated with his fiduciary duties as a class representative and named Plaintiff Reyes. I believe
8 that Plaintiff Reyes performed considerable services on behalf of the Class during the last 17 months,
9 since he searched for an attorney, collected and gathered the requested documents and information,
10 wage statements and/or pay stubs, met with us, made himself available each and every single time
11 that we called or asked him to come to our office in order to answer questions about Defendant's
12 policies and procedures produced in informal discovery or discussed during conversations with
13 opposing counsel and co-counsel or raised in pleadings filed in this matter. Plaintiff Reyes provided
14 Class Counsel with factual information needed to prepare the complaint and the notice to the LWDA.
15 He collected relevant documents and produced those documents to Class Counsel. He was available
16 during the full day mediation and continued to be engaged in continued settlement negotiations that
17 were ultimately required to reach a settlement in this case. I believe that the service fee request of
18 \$10,000 for Plaintiff Reyes as an enhancement payment as well as for providing general release of
19 his claims, including a Civil Code § 1542 waiver. As such, the requested payment is warranted for
20 his time and effort when the class members are able to receive money, for Plaintiff Reyes' efforts, as
21 well as the fact that he put himself at significant risk for liability for costs in this matter if Defendant
22 were the prevailing party in the litigation as well as for retaliation by other employers who may
23 discover and find it to be unappealing that he was Class representative in a lawsuit against Defendant,
24 his former employers. At this point in the approval process, Plaintiff Reyes' requested payment should
25 be approved and allow the Class Members an opportunity to object to the requested enhancement.

26 ATTORNEYS' FEES

27 10. Our firm has made every effort to litigate this action in an efficient and cost-effective
28 manner. Following review of our case file and hours and discussions with counsel, our firm has spent
approximately 52.9 hours on this matter. Lavi & Ebrahimian's lodestar is approximately \$30,200.00.

1 11. In summary form, counsel's many tasks included the following: pre-filing
2 investigation, legal research, and research of Defendant; meeting and communicating with client
3 regarding her responsibility in bringing the action, the facts of his case, his employment, his work
4 environment, his documents pleadings; reviewing Plaintiff Reyes's file and determining liability and
5 evaluating claim and defense strengths and weaknesses; legal research of case law and wage orders
6 regarding applicable claims and defenses; drafting notices for litigation; filing statements and reports;
7 meeting and conferring and working with co-counsel over informal discovery and mediation;
8 evaluating Defendant's policies; determining case strategy; communicating with co-counsel and
9 Defendant's Counsel; analyzing data and information provided in discovery; calculating damages;
10 reviewing settlement and settlement documents; reviewing the motion for preliminary approval and
11 supporting documents; meeting with client regarding approval of the settlement; drafting supporting
12 declarations; and reviewing motion for final approval and supporting documents. All of the tasks and
13 work performed were reasonable and necessary to the prosecution of this case and justified,
14 particularly in light of the result achieved.

15 12. Throughout the course of this litigation, I have spent approximately 23.3 hours on this
16 matter. My unadjusted lodestar for my hours spent on this case amounts to approximately \$11,650.00
17 (23.3 x \$500.00 = \$11,650.00). Given my experience and the focus of my practice, if I were to charge
18 for my type of work by the hour my rate would be \$500 per hour. A \$500 rate is warranted based on
19 my years of experience in a highly specialized area of law and is in line with the Laffey Matrix.
20 (Huether Decl. Ex. 5 available at <http://www.laffeymatrix.com/see.html>.) California Courts have
21 applied the Laffey Matrix with adjustments to the specific California locality where the Counsel's
22 office is located based on "Locality Pay Tables." (*Syers Properties III, Inc. v. Rankin* (2014) 226
23 Cal.App.4th 691, 695-696 [affirming fee award based on Laffey Matrix with upward 9 percent rate
24 adjustment from D.C. area compared to San Francisco Bay Area based on Locality Pay Tables]; *In*
25 *re HPL Techs., Inc., Secs. Litig.* (N.D. Cal. April 22, 2005, No. C-02-3510 VRW) 365 F.Supp.2d 912,
26 921-922 [using Laffey Matrix with upward adjustment of 9 percent for San Francisco based on
27 difference between D.C. Area 's +15.98 locality pay compared to San Francisco's +26.39 percent
28 locality pay differential from the federal courts' "Judiciary Salary Plan Pay Tables."].) Here,
Plaintiffs' Counsels' offices are located in Los Angeles County. For 2018, the Locality Pay Tables
(and Judiciary Salary Plan Pay Tables referred to in *In re HPL Techs., Inc.*), state a 2.35 percent

1 increase for the Los Angeles-Long Beach, CA area which includes the following counties: Kern
2 County, Los Angeles County, Orange County, Riverside County, San Bernardino County, Santa
3 Barbara County, and Ventura County. (Ex. 6, 7 [2018 Locality Pay Tables for Washington-Baltimore-
4 Arlington and Los Angeles-Long Beach, CA available at <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2018/general-schedule/>]; Ex. 8, 9 [Judiciary Salary Plan Pay
5 Tables available at <http://www.uscourts.gov/careers/compensation/judiciary-salary-plan-pay-rates>];
6 Ex. 10 [2018 Locality Pay Area Definitions defining counties within Los Angeles-Long Beach, CA
7 area available at [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-
8 wages/2018/locality-pay-area-definitions/](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2018/locality-pay-area-definitions/)].) In applying the 2.35 locality increase for attorneys
9 working in Kern County, Los Angeles County, Orange County, Riverside County, San Bernardino
10 County, Santa Barbara County, and Ventura County over the Washington-Baltimore area stated in
11 the Laffey Matrix, the Laffey Matrix states the following relevant rates: \$468 for attorneys 4 to 7
12 years out of law school, \$676 for attorneys 8 to 10 years out of law school, \$764 for attorneys 11 to
13 19 years out of law school, and \$920 for attorneys 20 plus years out of law school.

14 13. Working closely with the other attorneys' in my firm, including on motions for
15 attorneys' fees, I am aware of the experience and achievements of the counsel involved in this matter
16 as well as the rates which would be charged if our work was on an hourly basis. Having reviewed
17 numerous declarations in support of fee applications in Los Angeles, I also have knowledge of hourly
18 rates charged by other attorneys practicing in the field of employment law in Los Angeles. Based on
19 that information, I believe that my rate and the rates of the attorneys in my firm are fully consistent
20 with the market rate for attorneys with comparable expertise, experience and qualifications. Based on
21 the information I have, I believe that the rates of our firm are reasonable and appropriate fees for Los
22 Angeles attorneys with comparable expertise, experience, and qualifications.

23 14. Throughout the course of this litigation, Joseph Lavi estimates he has spent at least 14
24 hours litigating this matter. Accordingly, Mr. Lavi's unadjusted lodestar in this matter is \$10,500.00
25 (14 x \$750 = \$10,500.00). If Mr. Lavi were to charge a rate for this type of work by the hour, given
26 his experience and the focus of his practice, his current hourly rate would be \$750 per hour. A \$750
27 rate is warranted based on Mr. Lavi's years of experience in a highly specialized area of law and is in
28 line with the Laffey Matrix. This rate is also in line with other partners out of law school and practicing
for over 15 years in California as indicated by the 2014 and 2008 National Law Journal Survey.

15. Throughout the course of this litigation, Pooja V. Patel estimates she has spent at least 5 hours litigating this matter. Accordingly, Ms. Patel's unadjusted lodestar in this matter is \$2,750.00 (5 x \$550 = \$2,750.00). If Ms. Patel were to charge a rate for this type of work by the hour, given her experience and the focus of her practice, her current hourly rate would be \$550. Ms. Patel is an associate who graduated from Case Western Reserve University School of Law in 2015 and has been almost exclusively litigating employment matters since. A \$550 rate is warranted based on Ms. Patel's years of experience in a highly specialized area of law and is in line with the Laffey Matrix.

16. I have also reviewed the files and billable records for Kevin Farnan, a former attorney of Lavi & Ebrahimian, LLP, in this matter and Mr. Farnan spent approximately 10.6 hours litigating this matter. Mr. Farnan is no longer an associate with our firm. I am aware he graduated from the Loyola Law School, Los Angeles and has been licensed to practice law since 2019. Mr. Farnan's unadjusted lodestar in this matter is \$5,300.00 (10.6 x \$500 = \$5,300.00). If Mr. Farnan were to charge a rate for this type of work by the hour, given his experience, his current hourly rate is \$500 per hour.

ATTORNEYS' COSTS

17. Our firm maintains all records regarding costs expended on each case. I have reviewed the records of costs expended in this matter which total \$2,187.21. All costs were reasonably incurred in prosecution of the lawsuit and paid on a contingency basis. A large portion of these costs were associated with filing fees for this case, service of documents, and the PAGA submission.

EXHIBITS

18. Attached as Exhibit 1 to this declaration is a true and correct copy of the Lavi & Ebrahimian Costs.

19. Attached as Exhibit 2 is a true and correct copy of the compilation of attorneys hours of Lavi & Ebrahimian LLP.

20. Attached as Exhibit 3 to this declaration is a true and correct copy of printouts from the 2014 National Law Journal sampling of California firm billing rates.

21. Attached as Exhibit 4 to this declaration is a true and correct copy of the 2008 National Law Journal sampling of billing rates.

22. Attached as Exhibit 5 to this declaration is a true and correct printout of the Laffey Matrix available at <http://www.laffeymatrix.com/see.html>.

1 23. Attached as Exhibit 6 to this declaration is a true and correct copy of the 2020 Locality
2 Pay Table for Washington-Baltimore-Arlington available at [https://www.opm.gov/policy-data-](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2018/general-schedule/)
3 [oversight/pay-leave/salaries-wages/2018/general-schedule/](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2018/general-schedule/).

4 24. Attached as Exhibit 7 to this declaration is a true and correct copy of the 2020 Locality
5 Pay Table for Los Angeles-Long Beach, CA available at [https://www.opm.gov/policy-data-](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2018/general-schedule/)
6 [oversight/pay-leave/salaries-wages/2018/general-schedule/](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2018/general-schedule/).

7 25. Attached as Exhibit 8 to this declaration is a true and correct copy of the Judiciary
8 Salary Plan Pay Table for Washington-Baltimore-Arlington available at
9 <http://www.uscourts.gov/careers/compensation/judiciary-salary-plan-pay-rates>.

10 26. Attached as Exhibit 9 to this declaration is a true and correct copy of the Judiciary
11 Salary Plan Pay Table for Los Angeles-Long Beach, CA available at
12 <http://www.uscourts.gov/careers/compensation/judiciary-salary-plan-pay-rates>.

13 27. Attached as Exhibit 10 to this declaration is a true and correct copy of 2020 Locality
14 Pay Area Definitions defining counties within Los Angeles-Long Beach, CA area available at
15 [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2020/locality-pay-area-](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2020/locality-pay-area-definitions/)
16 [definitions/](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2020/locality-pay-area-definitions/).

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 February 13, 2023, at Beverly Hills, California.

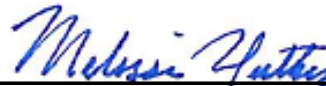
19
20 
21 _____
22 Melissa A. Huether
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24
25
26
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28

EXHIBIT 1

COSTS AND FEES ADVANCED BY LAVI & EBRAHIMIAN, LLP

DATE	ITEM	COST
N/A	Copying	\$61.00
N/A	Scanning	\$61.00
N/A	Fax	\$24.25
N/A	Mail	\$34.39
	LOS ANGELES COUNTY SUPERIOR COURT	
09/23/2021	Summons and Complaint Filing Fee (CLASS)	\$1,435.00
	DDS LEGAL SERVICES	
09/23/2021	Filing of Summons and Complaint (CLASS)	\$77.20
03/04/2022	Filing of Plaintiff Romero Reyes's Notice of Minute Order (CLASS)	\$34.15
03/22/2022	Filing of Plaintiff Romeo Reyes Status Report (CLASS)	\$34.15
04/12/2022	Filing of Plaintiff Romero Reyes's Notice of Minute Order Re: Initial Status Conference Continuance (CLASS)	\$83.90
07/07/2022	Plaintiff Romero Reyes Notice of Minute Order re: Initial Status Conference Continuance (CLASS)	\$34.15
08/26/2022	Plaintiff Romero Reyes and Defendants Clean Harbors Environmental Services, Inc. Joint Status Report and Request to Continue Initial Status Conference (CLASS)	\$34.15
10/20/2022	Filing of Declaration of Romero Reyes in support of Plaintiff's motion for Preliminary Approval of Class Action Settlement and Proof of Service	\$104.95
12/05/2022	Plaintiff Romero Reyes and Defendants Clean Harbors Environmental Services, Inc. Joint Status Report (CLASS)	\$34.15
	FEDEX	
08/11/2022	Tracking no.: 777641720501	\$29.92
10/11/2022	Tracking no.: 770177444786	\$29.85
	DEPARTMENT OF INDUSTRIAL RELATIONS	
09/23/2021	Private General Act Fee (PAGA)	\$75.00
	Total Costs, fees and expenses	\$2,187.21

EXHIBIT 2

CASE: Reyes v. Clean Harbors Environmental (Class/PAGA)

DATE	NAME	DESCRIPTION	HOURS
08/20/21	JL	Conduct Client Intake & Review Related Documents of Employment	2
08/20/21	JL	Draft Retainer and Related Documents	0.5
08/20/21	JL	Communications with Co-Counsel: Analysis, Documents Produced & Retainer	1
09/15/21	KF	Draft: Class Complaint for Damages and Restitution	4
09/22/21	KF	Draft: Summons -1pg	0.2
09/23/21	KF	Finalize and File Class Complaint for Damages and Restitution	1
09/23/21	KF	Draft and File Civil Case Cover Sheet Addendum	0.2
09/23/21	KF	Draft and File Civil Case Cover Sheet	0.2
09/23/21	KF	PAGA: Draft - Notice of Labor Code Violations Pursuant to Labor Code Section 2699.3 (PAGA Letter)	3
09/23/21	KF	Draft Personnel File Request Letter	1
09/23/21	KF	Review Court's Alternative Dispute Resolution Information Package	0.5
09/29/21	KF	Review Court's Minute Order: re: Newly Filed Class Action	0.2
09/29/21	KF	Review Court's Initial Status Conference Order	0.3
09/30/21	JL	Review Related Williams Matter Class Complaint	2
09/30/21	JL	Review Related Smith Matter First Amended Class Complaint	1
02/03/22	PP	Review Court's Minute Order: Notice of Continuance of Initial Status Conference	0.2
03/04/22	PP	Draft and File Plaintiff Romero Reyes's Notice of Minute Order	0.5
03/16/22	JL	Review Memorandum of Understanding	1.5
03/22/22	PP	Draft and File Plaintiff Romero Reyes's Status Report	1
04/06/22	PP	Review Minute Order: re: Initial Status Conference Continuance	0.3
04/08/22	JL	Review and Execute Memorandum of Understanding of Settlement	1
04/11/22	PP	Draft and File Plaintiff Romero Reyes's Notice of Minute Order re: Initial Status Conference Continuance	0.5
05/16/22	MH	Review First Amended Class Action Complaint (Smith Action)	1
07/07/22	PP	Draft Plaintiff's Notice of Minute Order re: Initial Status Conference Continuance	0.3
07/07/22	PP	Review Minute Order: re: Notice of Continuance of Initial Status Conference	0.2
07/28/22	MH	Review Co-Counsel's Final Draft: Smith's Second Amended Class Action Complaint (Smith Action)	2
08/11/22	JL	Review Joint Stipulation of Class and Representative Action	2

		Settlement Agreement	
08/25/22	MH	Draft and File Joint Status Report and Request to Continue Initial Stats Conference	1
08/30/22	MH	Review Defendant's Draft: Answer to Plaintiffs' Second Amended Complaint (Smith Action)	1
09/08/22	MH	Review Court's Minute Order: re: Notice of Continuance of Initial Status Conference	0.2
10/11/22	MH	Draft Declaration of Romero Reyes in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (Smith Action)	1.2
10/12/22	MH	Review Declaration of Kyle Nordrehaug in Support of Motion for Preliminary Approval of Class Action and PAGA (Smith Action)	0.5
10/13/22	MH	Draft Declaration of Melissa A. Huether in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (Smith Action)	2.5
10/19/22	MH	Review Declaration of Simon L. Yang in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (Smith Action)	0.5
10/19/22	MH	Review Declaration of Dawn Williams in Support of Plaintiffs Motion for Preliminary Approval of Class Action Settlement (Smith Action)	0.2
10/19/22	MH	Review Plaintiffs' Notice of Motion ands Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities in Support (Smith Action)	1
10/19/22	MH	Review [Proposed] Order Granting Motion for Preliminary Approval of Class Action Settlement (Smith Action)	0.3
10/19/22	MH	Review Declaration of Alonzo Smith in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (Smith Action)	0.2
10/19/22	MH	Finalize Declaration of Melissa A. Huether in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (Smith Action)	0.5
10/19/22	MH	Review Declaration of Larry W. Lee in Support of Plaintiffs Motion for Preliminary Approval of Class Action Settlement (Smith Action)	0.2
11/03/22	MH	Review Court's Tentative Rulings re: Motion for Preliminary Approval of Class Action Settlement (Smith Action)	0.5
11/04/22	MH	Review Court's Minute Order re: Case Management Conference (Smith Action)	0.2
11/04/22	MH	Review Court's Minute Order re: Motion for Preliminary Approval of Class Action Settlement (Smith Action)	0.3
11/07/22	MH	Communications with the Settlement Administrator	0.5
12/01/22	MH	Draft and Finalize Joint Status Report	1
02/06/23	MH	Draft Declaration of Romero Reyes in Support of Motion for	1

		Final Approval (Smith Action)	
02/06/23	MH	Review Motion for Final Approval and Supporting Documents (Smith Action)	2
02/03/23-02/06/23	MH	Draft Declaration of Melissa A. Huether in Support to Plaintiffs' Motion for Final Approval of Class Action Settlement (Smith Action)	2.5
	JL	Communications with Plaintiff	3
	PP	Communications with Plaintiff	2
	MH	Communications with Plaintiff	3

EXHIBIT 3

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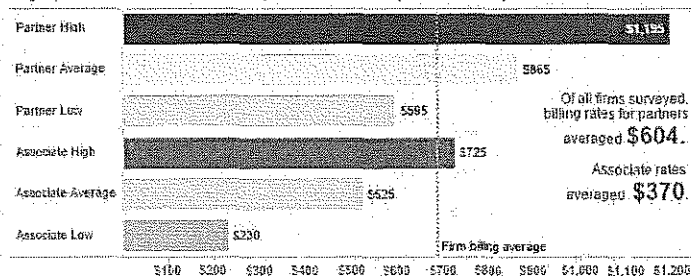
NLJ'S BILLING SURVEY

Select a Firm

- ☐ Miles & Stockbridge
- ☐ Miller & Martin
- ☐ Morgan Lewis
- ☐ Morris Manning
- ☒ Morrison & Foerster
- ☐ Nixon Peabody
- ☐ Norton Rose
- ☐ Butler McClellan
- ☐ O'Leary & Myers
- ☐ Orick Herrington
- ☐ Parker Poe
- ☐ Patton Boggs
- ☐ Paul Hastings
- ☐ Paul Weiss
- ☐ Pepper Hamilton
- ☐ Perkins Cole

Morrison & Foerster

Largest U.S. Office: San Francisco, 1,010 total full-time equivalent attorneys

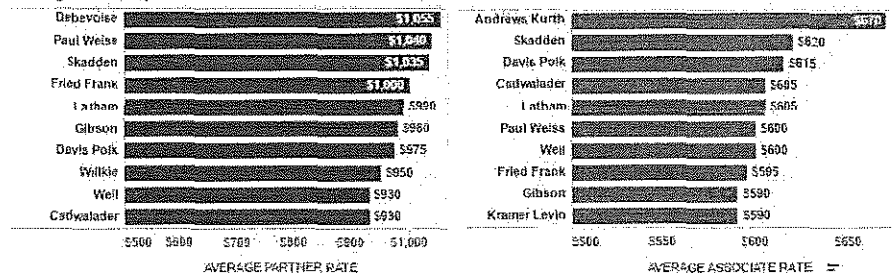


By the Numbers: The Firms Report Their Billing Rates

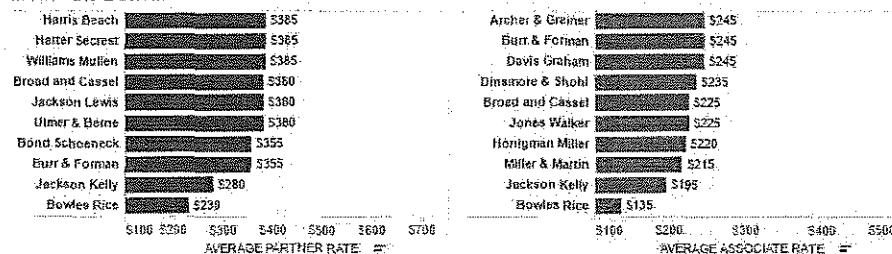
Firm	Largest U.S. Office	Total FTE Attorneys	Partner High	Partner Average	Partner Low	Associate High	Associate Average	Associate Low
Dechert	(New York)							
Andrews Kurth	Houston							
Hughes Hubbard	New York							
Irill & Manella	Los Angeles							
Proskauer Rose	New York							
White & Case	New York							
Morrison & Foerster	San Francisco	1,010	\$1,195	\$865	\$595	\$725	\$525	\$230
Pillsbury Winthrop	Washington							
Kaye Scholer	New York							
Kramer Levin	New York							
Hogan Lovells	Washington							
Kasowitz Benson	New York							
Kirkland & Ellis	Chicago							
Cooley	Palo Alto, Calif.							

Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013. N/A** Data not available due to merger in 2013.

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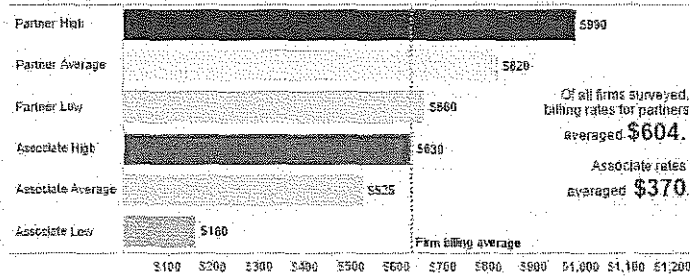
NLJ'S BILLING SURVEY

Select a Firm

- ☐ Connors Foley
- ☒ Cooley
- ☐ Covington & Burling
- ☐ Cox Smith
- ☐ Cozen O'Connor
- ☐ Curtis, Mallet-Prevost
- ☐ Davis Graham
- ☐ Davis Polk
- ☐ Debevoise & Plimpton
- ☐ Dechert
- ☐ Dentons
- ☐ Dickstein Shapiro
- ☐ Dinsmore & Shohi
- ☐ DLA Piper
- ☐ Dorsey & Whitney
- ☐ Drexel Burnham

Cooley

Largest U.S. Office: Palo Alto, Calif., 632 total full-time equivalent attorneys

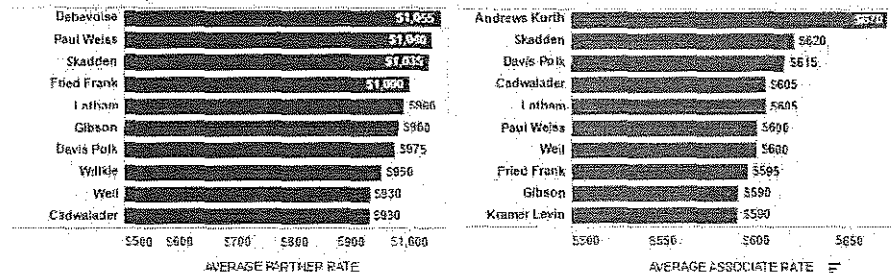


By the Numbers: The Firms Report Their Billing Rates

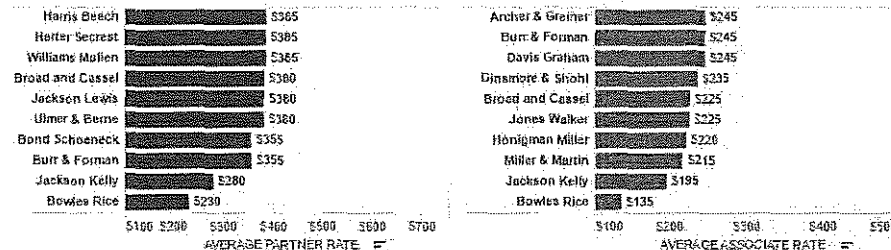
Firm	Largest U.S. Office	Total FTE Attorneys	Partner High	Partner Average	Partner Low	Associate High	Associate Average	Associate Low
Kaye, Scholer	New York							
Kramer Levin	New York							
Hogan Lovells	Washington							
Katowitz Benson	New York							
Kirkland & Ellis	Chicago							
Cooley	Palo Alto, Calif.	632	\$990	\$620	\$860	\$830	\$525	\$160
Arnold & Porter	Washington							
Paul Hastings	New York							
Curtis, Mallet-Prevost	New York							
Winston & Strawn	Chicago							
Bingham McCutchen	Boston							
Akin Gump	Washington							
Covington & Burling	Washington							
King & Spalding	Atlanta							

Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013. N/A** Data not available due to merger in 2013.

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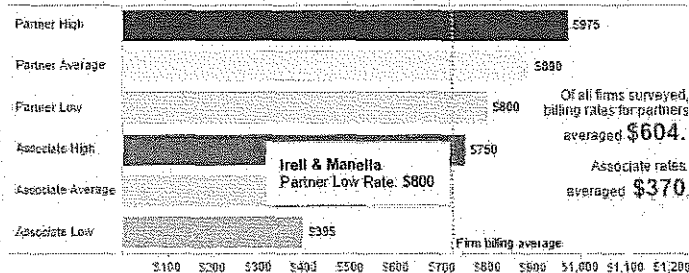
NLJ'S BILLING SURVEY

Select a Firm

☐ Harris Beach
☐ Harter Secrest
☐ Haynes and Boone
☐ Hogan Lovells
☐ Holland & Hart
☐ Holland & Knight
☐ Honigman Miller
☐ Hughes Hubbard
☐ Husch Blackwell
☐ Ice Miller
☒ Irell & Manella
☐ Jackson Kelly
☐ Jackson Lewis
☐ Jackson Walker
☐ Jenner & Block
☐ Jenner & Smith

Irell & Manella

Largest U.S. Office: Los Angeles 164 total full-time equivalent attorneys.

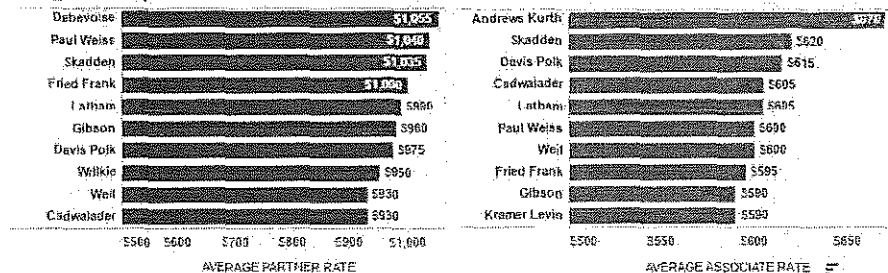


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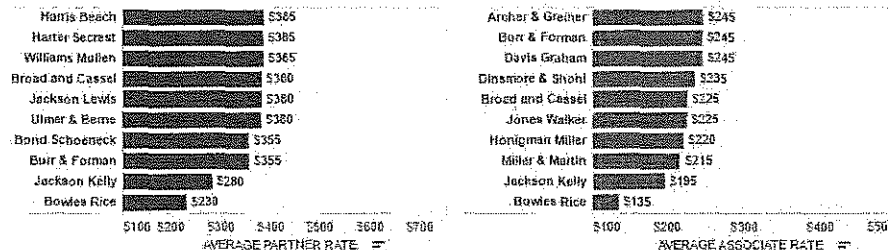
Firm	Largest U.S. Office	Total FTE Attorneys	Partner High	Partner Average	Partner Low	Associate High	Associate Average	Associate Low
Dechert	New York							
Andrews Kurth	Houston							
Hughes Hubbard	New York							
Irell & Manella	Los Angeles	164	\$975	\$890	\$800	\$750	\$535	\$395
Proskauer Rose	New York							
White & Case	New York							
Morrison & Foerster	San Francisco							
Pillsbury Winthrop	Washington							
Kaye Scholer	New York							
Kramer Levin	New York							
Hogan Lovells	Washington							
Kasowitz Benson	New York							
Kirkland & Ellis	Chicago							
Cooley	Palo Alto, Calif.							

Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 250 published in April 2013. NLJ** Data not available due to merger in 2013.

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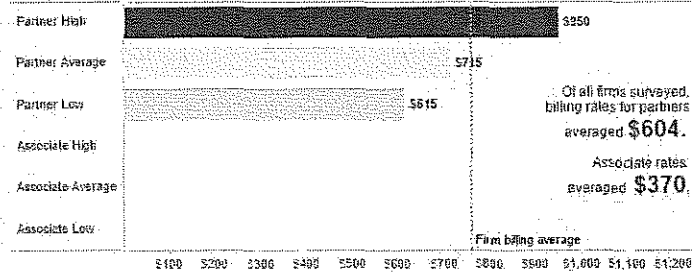
NLJ'S BILLING SURVEY

Select a Firm

- ☐ McEvoy Deutsch
- ☐ McGuireWoods
- ☐ McKenna Long
- ☐ Michael Best
- ☐ Miles & Stockbridge
- ☐ Miller & Martin
- ☐ Morgan Lewis
- ☐ Morris Manning
- ☐ Morrison & Foerster
- ☐ Nixon Peabody
- ☐ Norton Rose
- ☐ Potter McCann
- ☒ O'Melveny & Myers
- ☐ Orrick, Herrington
- ☐ Parker Poe
- ☐ Patton Boggs

O'Melveny & Myers

Largest U.S. Office: Los Angeles, 738 total full-time equivalent attorneys

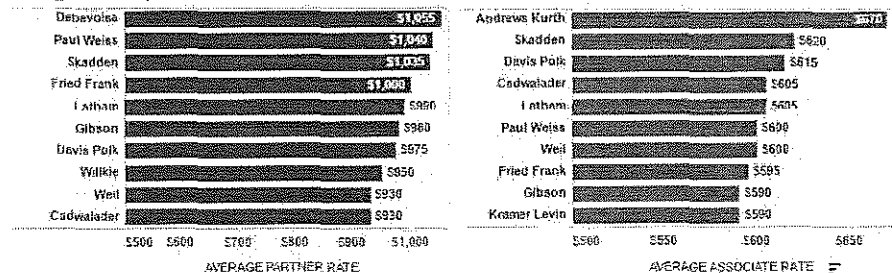


By the Numbers: The Firms Report Their Billing Rates

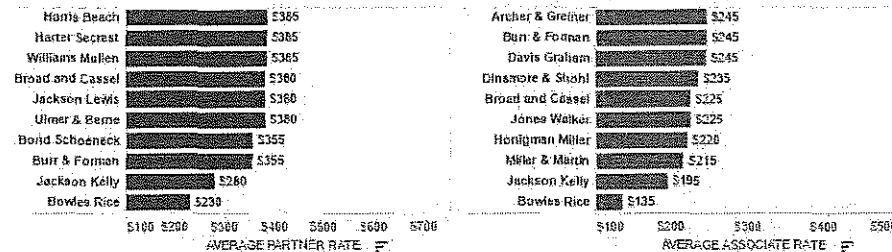
Firm	Largest U.S. Office	Total FTE Attorneys	Partner High	Partner Average	Partner Low	Associate High	Associate Average	Associate Low
Baker & McKenzie	Chicago							
Dickstein Shapiro	Washington							
Jenner & Block	Chicago							
Jones Day	New York							
Manatt Phelps	Los Angeles							
Seward & Kissel	New York							
O'Melveny & Myers	Los Angeles	738	\$250	\$715	\$615			
McDermott Will	Chicago							
Reed Smith	Pittsburgh							
Dentons	HOA**							
Jeffer Mangels	Los Angeles							
Sheppard Mullin	Los Angeles							
Alston & Bird	Atlanta							
Foley Hoag	Boston							

Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013. HOA** Data not available due to merger in 2013.

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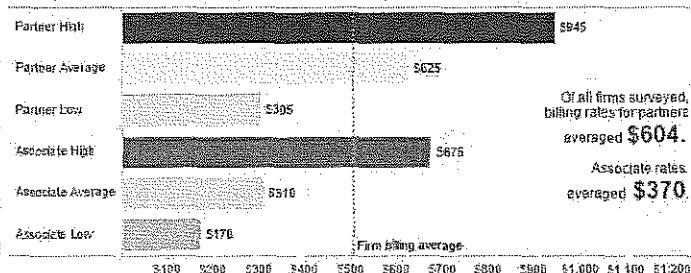
NLJ'S BILLING SURVEY

Select a Firm

- ☐ McCoy Deutsch
- ☐ McGuire Woods
- ☐ McKenna Long
- ☐ Michael Best
- ☐ Miller & Stockbridge
- ☐ Miller & Martin
- ☐ Morgan Lewis
- ☐ Morris Manning
- ☐ Morrison & Foerster
- ☐ Nixon Peabody
- ☐ Norton Rose
- ☐ Nutter McCloud
- ☐ O'Melveny & Myers
- ☒ Orrick, Herrington & Sutcliffe
- ☐ Parker Poe
- ☐ Patton Boggs

Orrick, Herrington & Sutcliffe

Largest U.S. Office: San Francisco. 977 total full-time equivalent attorneys

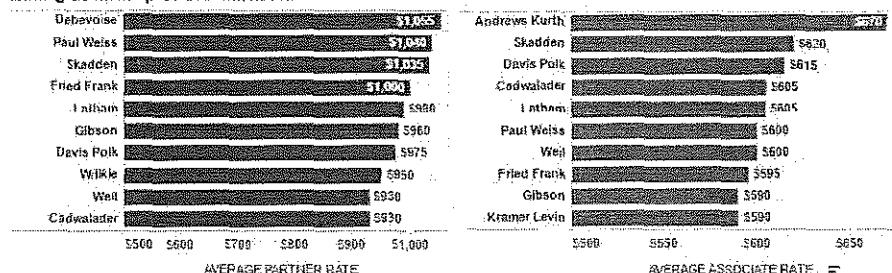


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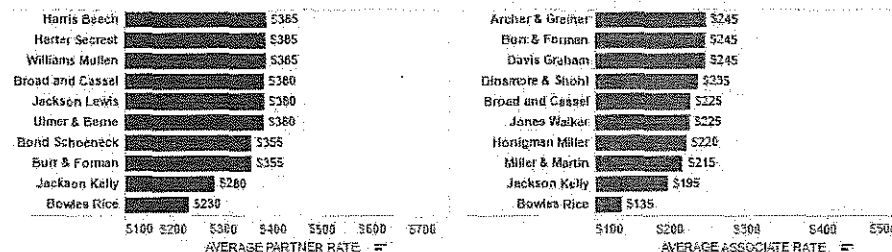
Firm	Largest U.S. Office	Total FTE Attorneys	Partner High	Partner Average	Partner Low	Associate High	Associate Average	Associate Low
Blank Rome	Philadelphia							
Kelley Drye	New York							
Gardere Wynne	Dallas							
Pepper Hamilton	Philadelphia							
Orrick, Herrington & Sutcliffe	San Francisco	977	\$845	\$625	\$395	\$675	\$516	\$170
Stevens & Lee	Reading, Pa.							
Duane Morris	Philadelphia							
Morgan Lewis	Philadelphia							
Troutman Sanders	Atlanta							
Allen Matkins	Los Angeles							
Katten Muchin	Chicago							
Lowenstein Sandler	Roseland, N.J.							
Seyfarth Shaw	Chicago							
Buchalter Nemer	Los Angeles							

Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013. N/A** Data not available due to merger in 2013.

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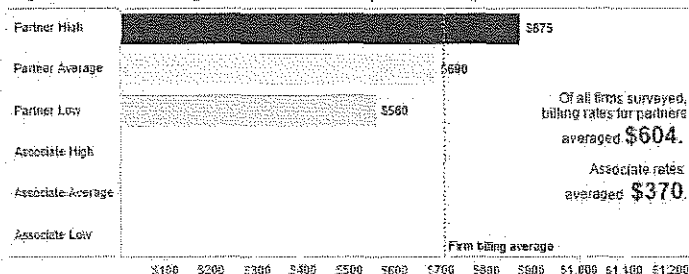
NLJ'S BILLING SURVEY

Select a Firm:

- ☐ Best & Martens
- ☐ Jackson Kelly
- ☐ Jackson Lewis
- ☐ Jackson Walker
- ☒ Jeffer Mangels
- ☐ Jenner & Block
- ☐ Jones Day
- ☐ Jones Walker
- ☐ Kasowitz Benson
- ☐ Katten Muchin
- ☐ Kaye Scholer
- ☐ Kelley Drye
- ☐ Kilpatrick Townsend
- ☐ King & Spalding
- ☐ Kirkland & Ellis
- ☐ Knobbe Martens

Jeffer, Mangels, Butler & Mitchell

Largest U.S. Office: Los Angeles. 126 total full-time equivalent attorneys.

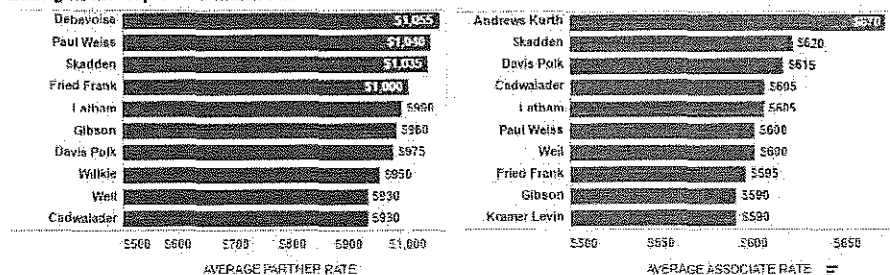


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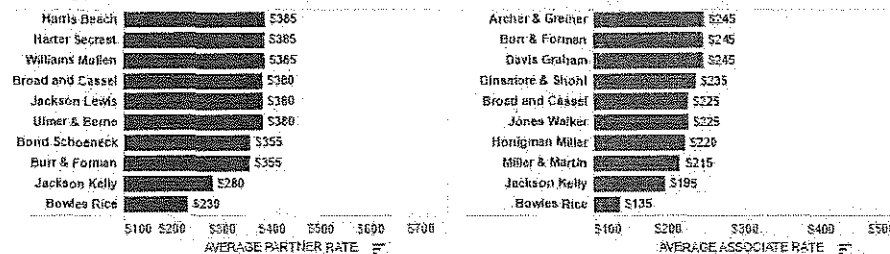
Firm	Largest U.S. Office	Total FTE Attorneys	Partner High	Partner Average	Partner Low	Associate High	Associate Average	Associate Low
Baker & McKenzie	Chicago							
Dickstein Shapiro	Washington							
Jenner & Block	Chicago							
Jones Day	New York							
Manatt Phelps	Los Angeles							
Seward & Kissel	New York							
O'Melveny & Myers	Los Angeles							
McDermott Will	Chicago							
Reed Smith	Pittsburgh							
Dentons	N/A**							
Jeffer Mangels	Los Angeles	126	\$675	\$600	\$560			
Shepherd Mullin	Los Angeles							
Alston & Bird	Atlanta							
Foley Hoag	Boston							

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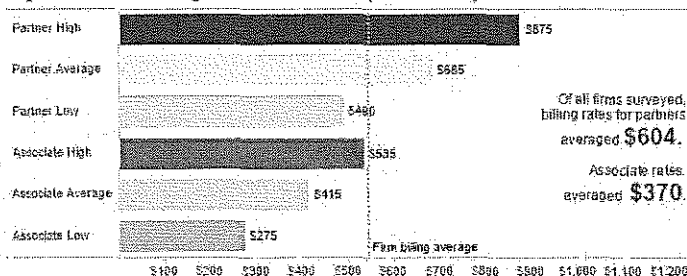
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Select a Firm:

Robles & Cole
Rutan & Tucker
Saul Ewing
Seidman
Seward & Kissel
Seitzman Shaw
Sheppard Mullin
Shumaker Loop
Shults & Bowen
Skadden, Arps
Smet & Wiener
Squire Sanders
Stevens & Lee
Stinson Morrison
Steel River
Strasburger & Price

Sheppard, Mullin, Richter & Hampton

Largest U.S. Office: Los Angeles. 521 total full-time equivalent attorneys

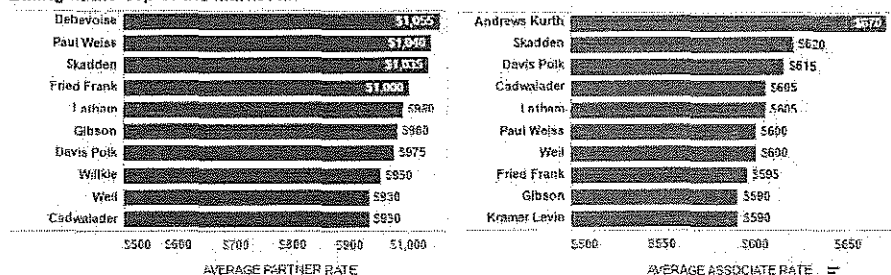


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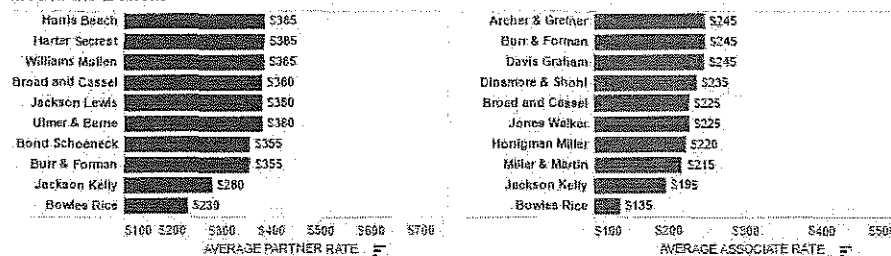
Firm	Largest U.S. Office	Total FTE Attorneys	Partner High	Partner Average	Partner Low	Associate High	Associate Average	Associate Low
Jeffrey Mangel	Los Angeles							
Sheppard Mullin	Los Angeles	521	\$875	\$685	\$480	\$535	\$415	\$275
Alston & Bird	Atlanta							
Foley Hoag	Boston							
Haynes and Boone	Dallas							
Patton Boggs	Washington							
Wiley Rein	Washington							
Richards Layton	Wilmington, Del.							
Venable	Washington							
Greenberg Traurig	New York							
Squire Sanders	Cleveland							
Arent Fox	Washington							
Blank Rome	Philadelphia							
Kelley Drye	New York							

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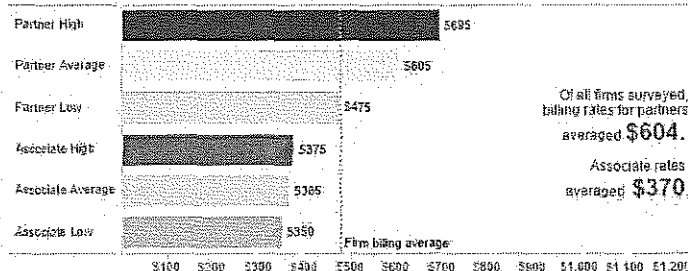
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Select a Firm

- ☐ Baird Spahr
- ☐ Barnes & Thornburg
- ☐ Benesch Friedlander
- ☐ Best Best
- ☐ Bingham McCutchen
- ☐ Blank Rome
- ☐ Bond Schoenack
- ☐ Bowles Rice
- ☐ Bracewell & Giuliani
- ☐ Bradley Arant
- ☐ Broad and Cassel
- ☐ Branstetter Hyatt
- ☐ Bryan Cave
- ☒ Buchalter Nemer
- ☐ Burr & Forman
- ☐ Butzel Long

Buchalter Nemer

Largest U.S. Office: Los Angeles, 134 total full-time equivalent attorneys

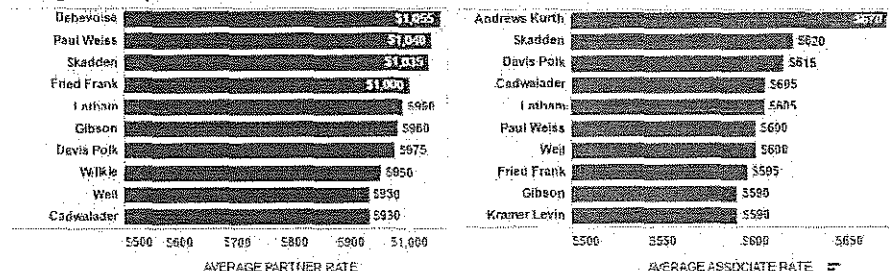


By the Numbers: The Firms Report Their Billing Rates

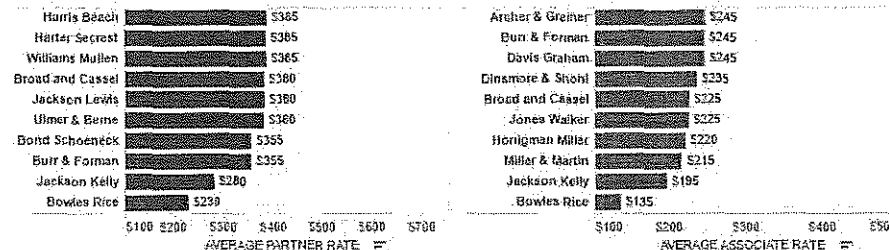
Firm	Largest U.S. Office	Total FTE Attorneys	Partner High	Partner Average	Partner Low	Associate High	Associate Average	Associate Low
Seyfarth Shaw	Chicago							
Buchalter Nemer	Los Angeles	134	\$695	\$605	\$475	\$375	\$365	\$350
Carlton Fields	Tampa, Fla.							
Foley & Lardner	Milwaukee							
Perkins Cole	Seattle							
Vinson & Elkins	Houston							
Holland & Knight	Washington							
McGuireWoods	Richmond, Va.							
Bryan Cave	St. Louis							
Nutter McClennen	Boston							
Gibbons	Newark, N.J.							
Cozen O'Connor	Philadelphia							
Knobbe Martens	Irvine, Calif.							
Kilpatrick Townsend	Atlanta							

Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013. N/A** Data not available due to merger in 2013.

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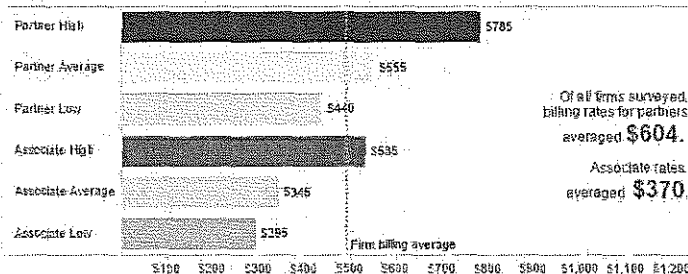
NLJ'S BILLING SURVEY

Select a Firm

- ☐ Katten Muchin
- ☐ Kaye Scholer
- ☐ Kelley Drye
- ☐ Kilpatrick Townsend
- ☐ King & Spalding
- ☐ Kirkland & Ellis
- ☒ Knobbe Martens
- ☐ Kramer Levin
- ☐ Lane Powell
- ☐ Lothman & Walkers
- ☐ Lathrop & Gage
- ☐ Leonard Street
- ☐ Lewis Roca
- ☐ Lindquist & Vennum
- ☐ Littler Mendelson
- ☐ Lovenstein Sandler

Knobbe, Martens, Olson & Bear

Largest U.S. Office: Irvine, Calif., 268 total full-time equivalent attorneys

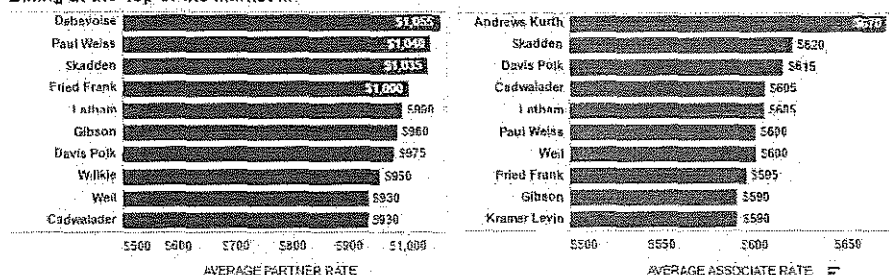


By the Numbers: The Firms Report Their Billing Rates

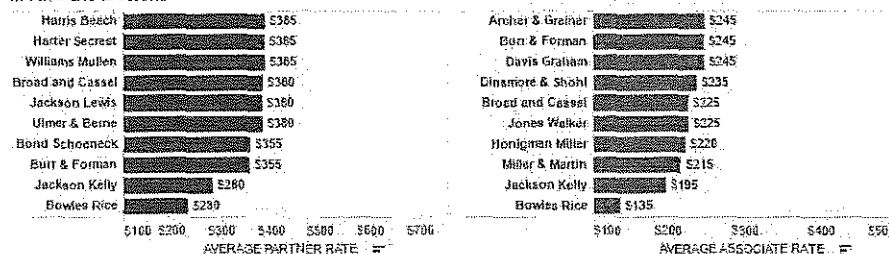
Firm	Largest U.S. Office	Total FTE Attorneys	Partner High	Partner Average	Partner Low	Associate High	Associate Average	Associate Low
Gibbons	Newark, N.J.							
Cozen O'Connor	Philadelphia							
Knobbe Martens	Irvine, Calif.	268	\$785	\$555	\$440	\$535	\$345	\$285
Kilpatrick Townsend	Atlanta							
Littler Mendelson	San Francisco							
Edward's Wildman	Boston							
Thompson & Knight	Dallas							
Fox Rothschild	Philadelphia							
McCart & English	Newark, N.J.							
McKenna Long	Atlanta							
Saul Ewing	Philadelphia							
Brownstein Hyatt	Denver							
Lindquist & Vennum	Minneapolis							
Nixon Peabody	Boston							

Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013. N/A** Data not available due to merger in 2013.

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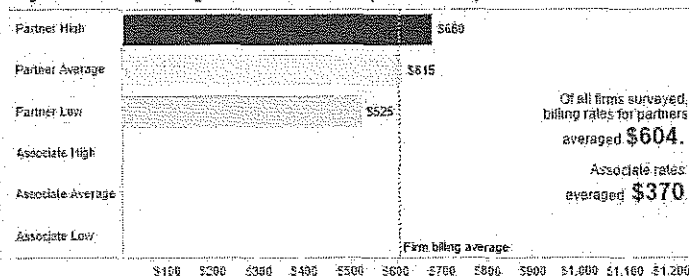
NLJ'S BILLING SURVEY

Select a Firm

- ☐ Adams and Reese
- ☐ Almaraz Center/ll
- ☐ Akin Gump
- ☒ Allen Matkins
- ☐ Alison & Bird
- ☐ Anarwa Kurth
- ☐ Archer & Greiner
- ☐ Aron Fox
- ☐ Arnall Golden
- ☐ Arnold & Porter
- ☐ Aydin & Lehr
- ☐ Baker & Hostetler
- ☐ Baker & McKenzie
- ☐ Baker Donelson
- ☐ Ballard Spahr
- ☐ Barnes & Thornburg

Allen Matkins Leck Gamble Mallory & Natsis

Largest U.S. Office: Los Angeles, 187 total full-time equivalent attorneys

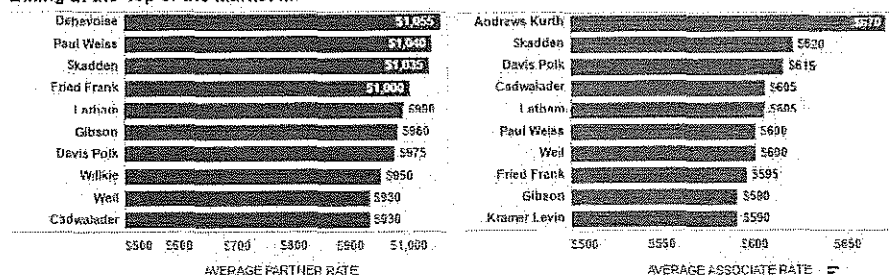


By the Numbers: The Firms Report Their Billing Rates

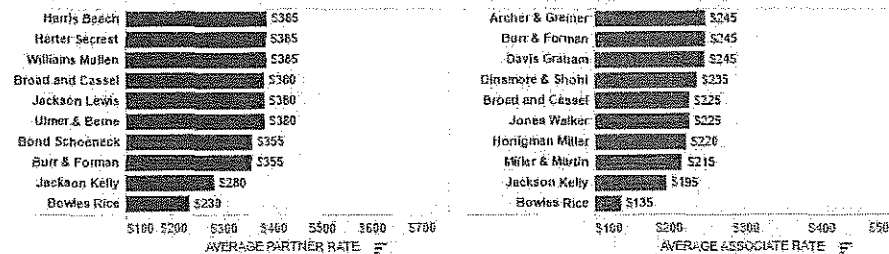
Firm	Largest U.S. Office	Total FTE Attorneys	Partner High	Partner Average	Partner Low	Associate High	Associate Average	Associate Low
Blank Rome	Philadelphia							
Kelley Drye	New York							
Gardere Wynne	Dallas							
Pappas Hamilton	Philadelphia							
Ornick Hemington	San Francisco							
Stevens & Lee	Reading, Pa.							
Duane Morris	Philadelphia							
Morgan Lewis	Philadelphia							
Troutman Sanders	Atlanta							
Allen Matkins	Los Angeles	187	\$680	\$615	\$525			
Katten Muchin	Chicago							
Lowenstein Sandler	Roseland, N.J.							
Szyfarth Shaw	Chicago							
Buchalter Nemer	Los Angeles							

Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013. "N/A" Data not available due to merger in 2013.

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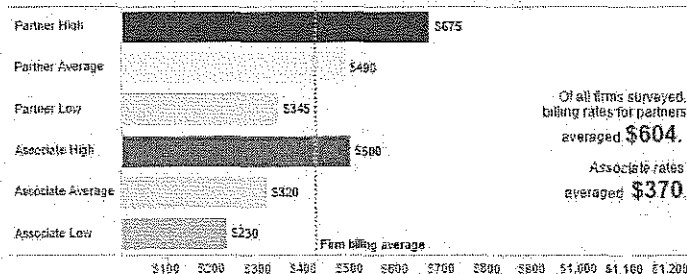
NLJ'S BILLING SURVEY

Select a Firm

- ☐ Pepper Hamilton
- ☐ Perkins Coie
- ☐ Pillsbury Winthrop
- ☐ Pionelli
- ☐ Proskauer Rose
- ☐ Quarles & Brady
- ☐ Quinn Emanuel
- ☐ Reed Smith
- ☐ Richards Layton
- ☐ Riker Danzig
- ☐ Robinson & Cole
- ☒ Rutan & Tucker
- ☐ Saul Ewing
- ☐ Sedgwick
- ☐ Seyward & Kissel
- ☐ Seyfarth Shaw

Rutan & Tucker

Largest U.S. Office: Costa Mesa, Calif., 139 total full-time equivalent attorneys.

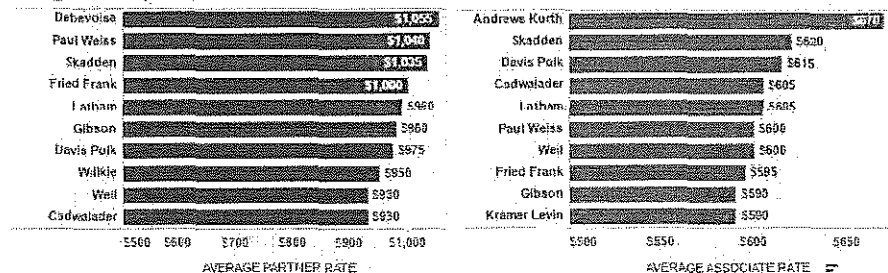


By the Numbers: The Firms Report Their Billing Rates

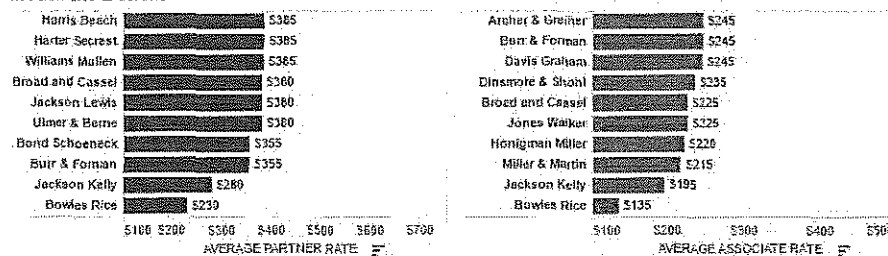
Firm	Largest U.S. Office	Total FTE Attorneys	Partner High	Partner Average	Partner Low	Associate High	Associate Average	Associate Low
Arnall Golden	Atlanta							
Rutan & Tucker	Costa Mesa, Calif.	139	\$675	\$490	\$345	\$580	\$320	\$230
Akerman Senterfitt	Blum							
Barnes & Thornburg	Indianapolis							
Morris Manning	Atlanta							
Ballard Spahr	Philadelphia							
Stinson Morrison	Kansas City, Mo.							
Steel Rives	Portland, Ore.							
Miles & Stockbridge	Baltimore							
Quarles & Brady	Milwaukee							
Armstrong & Lehr	Chicago							
Walter Landau	Nashville, Tenn.							
Benesch Friedlander	Cleveland							

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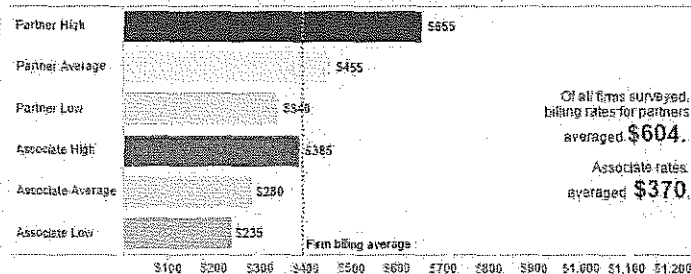
NLJ'S BILLING SURVEY

Select a Firm

- ☐ Alston & Brod
- ☐ Andrews Kurth
- ☐ Archer & Greiner
- ☐ Arent Fox
- ☐ Arnall Golden
- ☐ Arnold & Porter
- ☐ Austein & Lehr
- ☐ Baker & Hostetler
- ☐ Baker & McKenzie
- ☐ Baker Donelson
- ☐ Ballard Spahr
- ☐ Barnes & Thornburg
- ☐ Benesch Friedlander
- ☒ Best Best
- ☐ Bingham McCutchen
- ☐ Blank Rome

Best Best & Krieger

Largest U.S. Office: Riverside, Calif., 175 total full-time equivalent attorneys

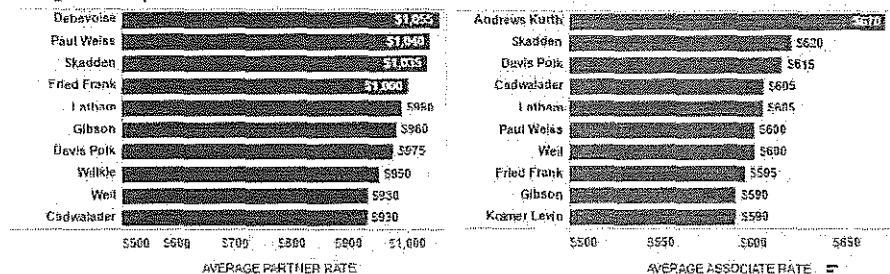


By the Numbers: The Firms Report Their Billing Rates

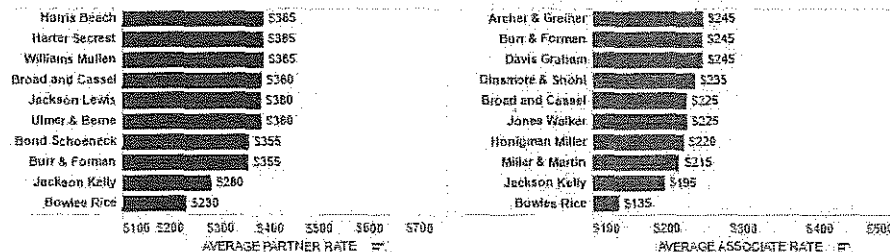
Firm	Largest U.S. Office	Total FTE Attorneys	Partner High	Partner Average	Partner Low	Associate High	Associate Average	Associate Low
Quarles & Brady	Memphis							
Arnstein & Lehr	Chicago							
Waller Lansden	Nashville, Tenn.							
Benesch Friedlander	Cleveland							
Best Best	Riverside, Calif.	175	\$655	\$455	\$340	\$385	\$280	\$235
Faegre Baker	Minneapolis							
Riker Danzig	Hartford, N.J.							
Baker & Hostetler	Cleveland							
Ice Miller	Indianapolis							
Parker Poe	Charlotte, N.C.							
Michael Best	Milwaukee							
Butzel Long	Bloomfield Hills, Mich.							
McElroy Deutsch	Morrisville, N.J.							
Thompson Coburn	St. Louis							

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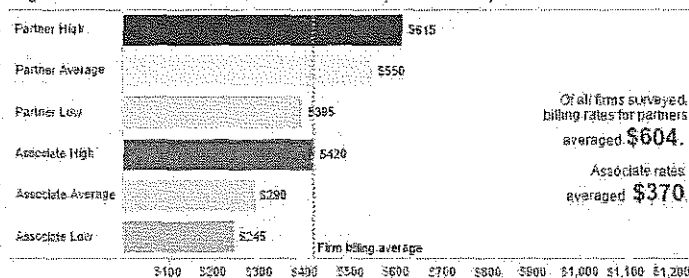
NLJ'S BILLING SURVEY

Select a Firm

- ☐ Latham & Watkins
- ☐ Lathrop & Gage
- ☐ Leonard Street
- ☐ Lovib Roca
- ☐ Lindquist & Vennum
- ☒ Littler Mendelson
- ☐ Lovenstein Sandler
- ☐ Manatt Phelps
- ☐ McCarter & English
- ☐ McDermott Will
- ☐ McCreary Devisch
- ☐ McGuire Woods
- ☐ McKenna Long
- ☐ Michael Best
- ☐ Miles & Stockbridge
- ☐ Miller & Martin

Littler Mendelson

Largest U.S. Office: San Francisco, 909 total full-time equivalent attorneys

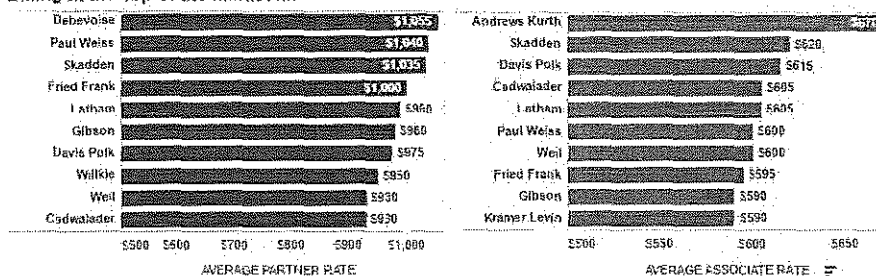


By the Numbers: The Firms Report Their Billing Rates

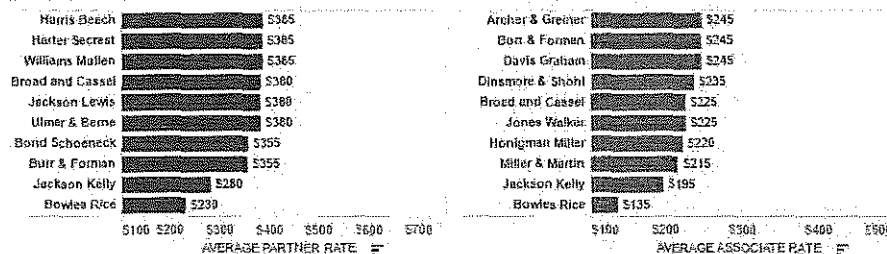
Firm	Largest U.S. Office	Total FTE Attorneys	Partner High	Partner Average	Partner Low	Associate High	Associate Average	Associate Low
Gilthons	Newark, N.J.							
Cozen O'Connor	Philadelphia							
Knobbe Martens	Irvine, Calif.							
Kilpatrick Townsend	Atlanta							
Littler Mendelson	San Francisco	909	\$615	\$550	\$395	\$420	\$290	\$245
Edwards Wildman	Boston							
Thompson & Knight	Dallas							
Fox Rothschild	Philadelphia							
McCarter & English	Newark, N.J.							
McKenna Long	Atlanta							
Saul Ewing	Philadelphia							
Brownstein Hyatt	Denver							
Lindquist & Vennum	Minneapolis							
Nixon Peabody	Boston							

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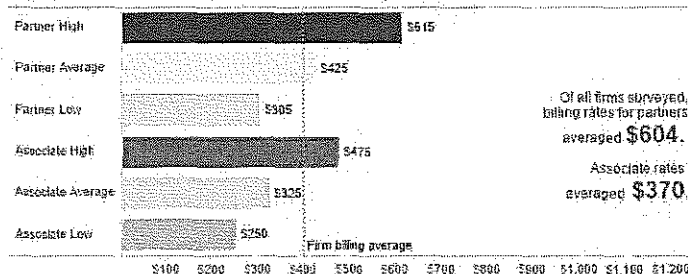
NLJ'S BILLING SURVEY

Select a Firm

- ☐ Pepper Hamilton
- ☐ Perlman Cole
- ☐ Pillsbury Winthrop
- ☐ Potomac
- ☐ Proskauer Rose
- ☐ Quarles & Brady
- ☐ Quinn Emanuel
- ☐ Reed Smith
- ☐ Richards Layton
- ☐ Riker Danzig
- ☐ Robinson & Cole
- ☐ Rutan & Tucker
- ☐ Sant Ewing
- ☒ Sedgwick
- ☐ Seyward & Smith
- ☐ Seyfarth Shaw

Sedgwick

Largest U.S. Office: San Francisco, 347 total full-time equivalent attorneys

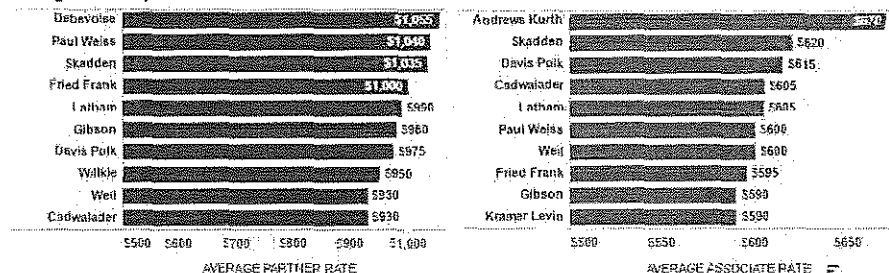


By the Numbers: The Firms Report Their Billing Rates

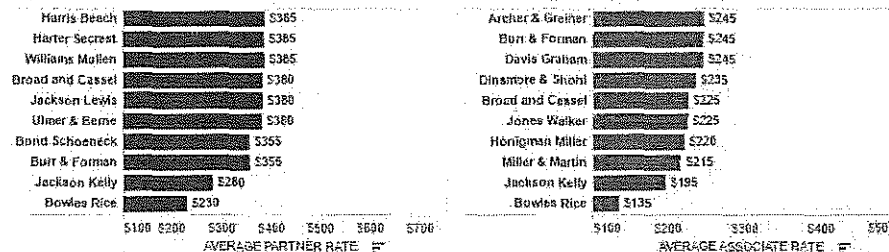
Firm	Largest U.S. Office	Total FTE Attorneys	Partner High	Partner Average	Partner Low	Associate High	Associate Average	Associate Low
Pepper Hamilton	Denver							
Bradley Arant	Birmingham, Ala.							
Husch Blackwell	St. Louis							
Lane Powell	Seattle							
Shutts & Bowen	Miami							
Connell Foley	Houston, N.J.							
Sedgwick	San Francisco	347	\$615	\$425	\$305	\$475	\$325	\$250
Gordon & Rees	San Francisco							
Lathrop & Gage	Kansas City Mo.							
Strasburger & Price	Oaklee							
Wyatt Tarrant	Louisville, Ky.							
Taft Stettinius	Cincinnati							
Potomac	Kansas City Mo.							
Robinson & Cole	Hartford, Conn.							

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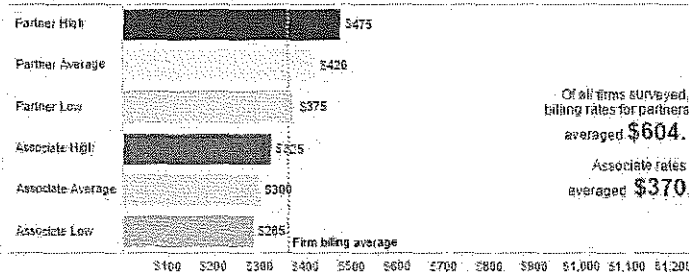
NLJ'S BILLING SURVEY

Select a Firm

- ☐ Dorsey & Whitney
- ☐ Deane Morris
- ☐ Edwards Wildman
- ☐ Faegre Baker
- ☐ Foley & Lardner
- ☐ Foley Hoag
- ☐ Fox Rothschild
- ☐ Fried Frank
- ☐ Gardner Whynne
- ☐ Gibbons
- ☐ Gibson Dunn
- ☒ Gordon & Rees
- ☐ Greenberg Traut
- ☐ Hahn Beach
- ☐ Harter Secrest
- ☐ Kaye, Pomeroy & Fierman

Gordon & Rees

Largest U.S. Office: San Francisco. 457 total full-time equivalent attorneys

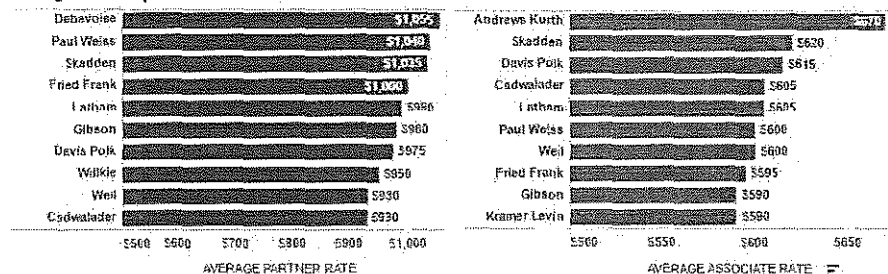


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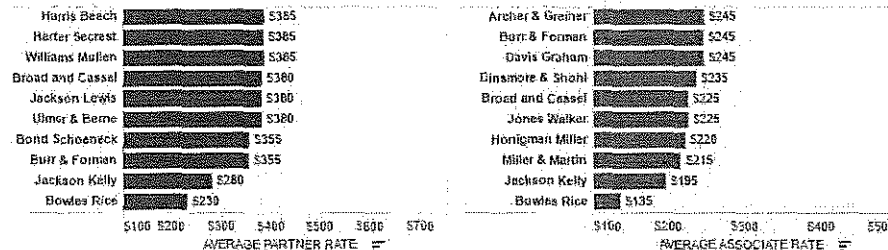
Firm	Largest U.S. Office	Total FTE Attorneys	Partner High	Partner Average	Partner Low	Associate High	Associate Average	Associate Low
Andrus & Bart	Denver							
Bradley Arant	Birmingham, Ala.							
Husch Blackwell	St. Louis							
Lane Powell	Seattle							
Shutts & Bowen	Miami							
Connell Foley	Roseland, N.J.							
Sedgwick	San Francisco							
Gordon & Rees	San Francisco	457	\$475	\$426	\$375	\$325	\$300	\$285
Lathrop & Gage	Kansas City, Mo.							
Strasburger & Price	Dallas							
Wyatt Tarrant	Lehigh, Pa.							
Taft Stettinius	Chennai							
Polinelli	Kansas City, Mo.							
Robinson & Cole	Hartford, Conn.							

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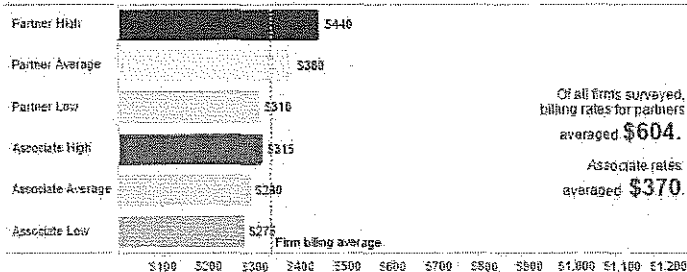
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Select a Firm

[Harris Beach](#)
[Harter Secrest](#)
[Haynes and Boone](#)
[Hogan Lovells](#)
[Holand & Mori](#)
[Holand & Knight](#)
[Honigman Miller](#)
[Hughes Hubbard](#)
[Husch Blackwell](#)
[Ice Miller](#)
[Irrell & Manabe](#)
[Jackson Kelly](#)
☒ [Jackson Lewis](#)
[Jackson Walker](#)
[Jeffer Mangels](#)
[Jenner & Block](#)

Jackson Lewis

Largest U.S. Office: Los Angeles. 690 total full-time equivalent attorneys.

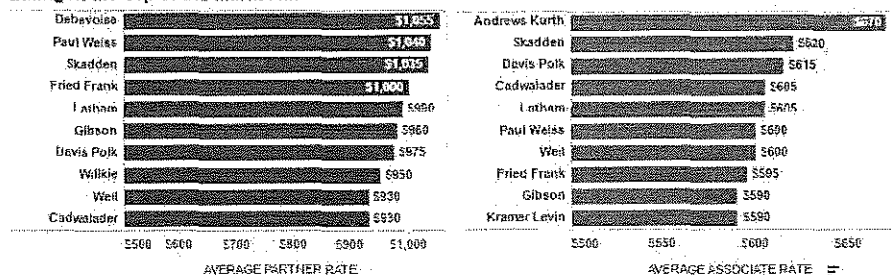


By the Numbers: The Firms Report Their Billing Rates

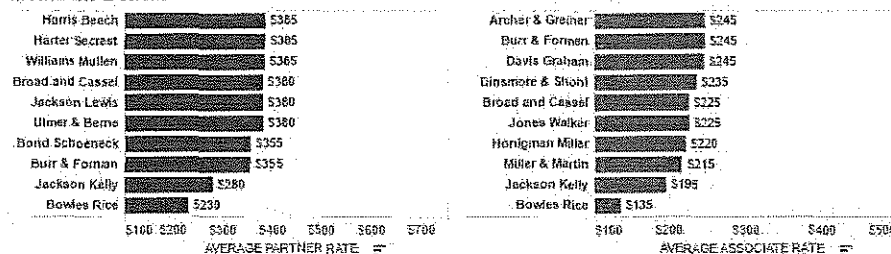
Firm	Largest U.S. Office	Total FTE Attorneys	Partner High	Partner Average	Partner Low	Associate High	Associate Average	Associate Low
Honigman Miller	Detroit							
Varnum	Grand Rapids, Mich.							
Harris Beach	Rochester, N.Y.							
Harter Secrest	Rochester, N.Y.							
Jones Walker	New Orleans							
Miller & Martin	Chattanooga, Tenn.							
Williams Mullen	Richmond, Va.							
Broad and Cassel	Orlando, Fla.							
Jackson Lewis	Los Angeles	690	\$440	\$380	\$310	\$315	\$280	\$275
Ulmer & Berne	Cleveland							
Bond Schoeneck	Syracuse, N.Y.							
Burr & Forman	Birmingham, Ala.							
Jackson Kelly	Charleston, W.Va.							
Bowles Rice	Charleston, W.Va.							

Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013. N/A** Data not available due to merger in 2013.

Billing at the Top of the Market ...



... And the Bottom

Purchase the complete NLJ Law Firm Billing Survey from www.almlegalintel.com

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Methodology/Sources: These data were compiled by ALM Legal Intelligence, the research arm of the NLJ's parent, ALM Media LLC. We asked respondents to the NLJ's annual survey of the nation's largest law firms (the "NLJ 350") to provide a range of hourly billing rates for partners and associates. For firms that did not supply data to us, in many cases we were able to supplement billing rate data derived from public records. In total, we have rates for 159 of the nation's 350 largest firms. Rates data include averages, highs, and low rates for partners and associates. Information also includes the average full-time equivalent (FTE) attorneys at the firm and the city of the firm's principal or largest office.

This methodology has been modified since first published to note that the data cited were compiled by ALM Legal Intelligence, the research arm of the NLJ's parent, ALM Media LLC.

EXHIBIT 4

THE NATIONAL LAW JOURNAL

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A nationwide sampling of law firm billing rates

December 08, 2008

The National Law Journal asked the respondents to its 2008 survey of the nation's 250 largest law firms to provide a range of hourly billing rates for partners and associates. Firms that supplied this information — including some firms that are not in the NLJ 250 — are listed below in alphabetical order. We also asked firms to provide average and median billing rates, and several complied. The number after a firm's name indicates the total number of attorneys at the firm. The city listed after the name of a firm is the location of its principal or largest office.

The 2008 NLJ Billing Survey is [available in downloadable Excel format](#) from ALM Research.

Adams and Reese (253), New Orleans
Partners \$240-\$425 (average \$318, median \$310)
Associates \$175-\$300 (average \$209, median \$205)
Firmwide (average \$257, median \$265)

Arent Fox (336), Washington
Partners \$410-\$710
Associates \$260-\$465

Armstrong Teasdale (252), St. Louis
Partners \$295-\$450
Associates \$175-\$300

Baker, Donelson, Bearman, Caldwell & Berkowitz (549), Memphis, Tenn.
Partners \$230-\$525 (average \$339, median \$330)
Associates \$120-\$300 (average \$218, median \$220)
Firmwide (average \$295, median \$290)

Baich & Bingham (244), Birmingham, Ala.
Partners \$295-\$600
Associates \$200-\$280

Bass, Berry & Sims (211), Nashville, Tenn.
Partners \$240-\$575 (average \$410, median \$420)
Associates \$175-\$365 (average \$245, median \$240)
Firmwide (average \$307, median \$300)

Best Best & Krieger (198), Riverside, Calif.
Partners \$300-\$550 (average \$391, median \$375)
Associates \$190-\$330 (average \$252, median \$245)
Firmwide (average \$340, median \$305)

Blank Rome (503), Philadelphia
Partners \$425-\$785 (average \$525)
Associates \$245-\$485 (average \$332)
Firmwide (average \$400)

Bond, Schoeneck & King (189), Syracuse, N.Y.
Partners \$210-\$450 (average \$308, median \$310)

Associates \$150-\$250 (average \$187, median \$185)
Firmwide (average \$268, median \$275)

Bradley Arant Rose & White (255), Birmingham, Ala.
Partners \$260-\$550
Associates \$170-\$310

Briggs and Morgan (175), Minneapolis
Partners \$300-\$580 (average \$420, median \$425)
Associates \$195-\$290 (average \$229, median \$225)
Firmwide (average \$368, median \$390)

Brinks Hofer Gilson & Lione (171), Chicago
Partners \$320-\$700 (average \$499, median \$500)
Associates \$180-\$435 (average \$281, median \$275)
Firmwide (average \$392, median \$390)

Broad and Cassel (179), Orlando, Fla.
Partners \$290-\$475 (average \$378, median \$375)
Associates \$175-\$320 (average \$245, median \$248)
Firmwide (average \$314, median \$310)

Brownstein Hyatt Farber Schreck (235), Denver
Partners \$275-\$750 (average \$424, median \$400)
Associates \$160-\$285 (average \$234, median \$240)
Firmwide (average \$340, median \$325)

Bryan Cave (852), St. Louis
Partners \$340-\$750 (average \$525, median \$510)
Associates \$170-\$510 (average \$314, median \$310)
Firmwide (average \$424, median \$405)

Buchalter Nemer (146), Los Angeles
Partners \$260-\$600 (average \$448, median \$450)
Associates \$225-\$450 (average \$283, median \$275)
Firmwide (average \$384, median \$375)

Buchanan Ingersoll & Rooney (529), Pittsburgh
Partners \$300-\$1,020
Associates \$100-\$520

Bullivant Houser Bailey (153), Portland, Ore.
Partners \$275-\$525
Associates \$190-\$325

Burr & Forman (208), Birmingham, Ala.
Partners \$210-\$495 (average \$352, median \$350)
Associates \$165-\$305 (average \$235, median \$230)
Firmwide (average \$271, median \$295)

Butzel Long (243), Detroit
Partners \$300-\$650
Associates \$180-\$290

Carlton Fields (281), Tampa, Fla.
Partners \$305-\$650 (average \$435, median \$435)
Associates \$195-\$335 (average \$267, median \$265)
Firmwide (average \$334, median \$325)

Coolley Godward Kronish (618), Palo Alto, Calif.
Partners \$525-\$980
Associates \$285-\$570

Cozen O'Connor (478), Philadelphia
Partners \$240-\$840 (average \$457, median \$455)
Associates \$205-\$650 (average \$342, median \$325)
Firmwide (average \$397, median \$385)

Curtis, Mallet-Prevost, Colt & Mosle (235), New York
Partners \$675-\$785 (average \$730, median \$730)
Associates \$290-\$575 (average \$434, median \$435)
Firmwide (average \$520, median \$515)

Davis Wright Tremaine (467), Seattle
Partners \$300-\$710 (average \$455, median \$450)
Associates \$190-\$405 (average \$280, median \$280)
Firmwide (average \$395, median \$395)

Day Pitney (405), Florham Park, N.J.
Partners \$295-\$710
Associates \$220-\$450

Dickinson Wright (228), Detroit
Partners \$275-\$550
Associates \$180-\$300

Dickstein Shapiro (403), Washington
Partners \$475-\$895 (average \$607, median \$605)
Associates \$250-\$475 (average \$378, median \$395)
Firmwide (average \$493) (median \$485)

Dinsmore & Shohl (347), Cincinnati
Partners \$220-\$495 (average \$347, median \$338)
Associates \$160-\$305 (average \$202, median \$198)
Firmwide (average \$284, median \$275)

Dorsey & Whitney (670), Minneapolis
Partners \$235-\$1,180 (average \$505, median \$510)
Associates \$170-\$820 (average \$301, median \$335)
Firmwide (average \$407, median \$430)

Duane Morris (594) (Philadelphia)
Partners \$340-\$755 (average \$490, median \$505)
Associates \$230-\$510 (average \$326, median \$350)
Firmwide (average \$449, median \$450)

Dykema Gossett (374), Detroit
Partners \$265-\$650 (average \$415)
Associates \$170-\$435 (average \$277)

Edwards Angell Palmer & Dodge (576), Boston
Partners \$325-\$755
Associates \$170-\$480
Firmwide (median \$450)

Epstein Becker & Green (372), New York
Partners \$350-\$850 (average \$501, median \$495)
Associates \$175-\$450 (average \$312, median \$300)
Firmwide (average \$406, median \$400)

Fisher & Phillips (208), Atlanta
Partners \$330-\$505
Associates \$195-\$380

Foley & Lardner (1,032), Milwaukee
Partners (average \$596, median \$585)
Associates (average \$405, median \$395)
Firmwide \$185-\$985 (average \$508, median \$520)

Ford & Harrison (179), Atlanta
Partners \$325-\$585
Associates \$245-\$405

Fowler White Boggs Banker (201*), Tampa, Fla.

Partners \$175-\$525 (average \$360, median \$350)
Associates \$160-\$325 (average \$222, median \$220)
Firmwide (average \$314, median \$325)
(*Total prior to subsequent firm split.)

Fox Rothschild (440), Philadelphia

Partners \$250-\$590 (average \$443, median \$450)
Associates \$215-\$395 (average \$275, median \$260)
Firmwide (average \$378, median \$375)

Fredrikson & Byron (233), Minneapolis

Partners \$250-\$590 (average \$402, median \$395)
Associates \$150-\$315 (average \$237, median \$225)
Firmwide (average \$340, median \$340)

Frost Brown Todd (342), Cincinnati

Partners \$225-\$490 (average \$317, median \$310)
Associates \$145-\$260 (average \$188, median \$180)
Firmwide (average \$272, median \$270)

Gardere Wynne Sewell (281), Dallas

Partners \$380-\$750 (average \$502, median \$500)
Associates \$210-\$450 (average \$306, median \$300)
Firmwide (average \$374, median \$390)

Gibbons (230), Newark, N.J.

Partners \$375-\$700
Associates \$220-\$415

GrayRobinson (213), Orlando, Fla.

Partners \$200-\$650 (average \$310, median \$285)
Associates \$125-\$275 (average \$164, median \$167)
Firmwide (average \$239, median \$252)

Greenberg Traurig (1,840), New York

Partners \$335-\$850 (average \$520, median \$535)
Associates \$175-\$525 (average \$323, median \$325)
Firmwide (average \$426, median \$425)

Harris Beach (179), Rochester, N.Y.

Partners \$250-\$475
Associates \$140-\$275

Hiscock & Barclay (187), Syracuse, N.Y.

Partners \$190-\$650 (average \$361, median \$359)
Associates \$145-\$430 (average \$235, median \$224)
Firmwide (average \$319, median \$322)

Hodgson Russ (227), Buffalo, N.Y.

Partners \$240-\$665 (average \$355, median \$350)
Associates \$165-\$450 (average \$230, median \$235)
Firmwide (average \$303, median \$300)

Hogan & Hartson (1,175), Washington

Partners \$375-\$900 (average \$660, median \$650)
Associates \$150-\$550 (average \$410, median \$400)
Firmwide (average \$525, median \$525)

Holland & Hart (406), Denver

Partners \$295-\$615 (average \$414, median \$405)
Associates \$175-\$355 (average \$269, median \$275)
Firmwide (average \$350, median \$345)

Holme Roberts & Owen (228), Denver

Partners \$285-\$635 (average \$415, median \$410)
Associates \$160-\$525 (average \$294, median \$265)
Firmwide (average \$355, median \$345)

Howard Rice Nemerovski Canady Falk & Rabkin (102), San Francisco

Partners \$515-\$795

Associates \$275-\$510

Hughes Hubbard & Reed (334), New York

Partners \$625-\$875

Associates \$270-\$600

Husch Blackwell Sanders (629), St. Louis

Partners \$205-\$740 (average \$352, median \$340)

Associates \$150-\$380 (average \$218, median \$215)

Firmwide (average \$302, median \$300)

Jackson Kelly (187), Charleston, W.Va.

Partners \$200-\$435 (average \$238, median \$247)

Associates \$135-\$335 (average \$155, median \$151)

Firmwide (average \$214, median \$212)

Jackson Lewis (517), White Plains, N.Y.

Partners \$250-\$595

Associates \$180-\$405

Jenner & Block (482), Chicago

Partners \$525-\$1,000 (average \$616, median \$575)

Associates \$325-\$495 (average \$393, median \$375)

Jones, Walker, Waechter, Poltevent, Carrère & Denègre (264), New Orleans

Partners \$225-\$620 (average \$332, median \$325)

Associates \$140-\$250 (average \$186, median \$180)

Firmwide (average \$277, median \$275)

Kilpatrick Stockton (466), Atlanta

Partners \$310-\$695 (average \$485, median \$475)

Associates \$225-\$400 (average \$290, median \$275)

Firmwide (average \$400, median \$395)

Kelley Drye & Warren (378), New York

Partners \$430-\$850

Associates \$255-\$520

Knobbe, Martens, Olson & Bear (249), Irvine, Calif.

Partners \$375-\$660 (average \$473, median \$450)

Associates \$245-\$430 (average \$287, median \$275)

Firmwide (median \$362)

Lane Powell (170), Seattle

Partners \$325-\$550 (average \$405, median \$400)

Associates \$195-\$325 (average \$270, median \$275)

Firmwide (average \$327, median \$350)

Lathrop & Gage (281), Kansas City, Mo.

Partners \$255-\$490

Associates \$180-\$265

Leonard, Street and Deinard (189), Minneapolis

Partners \$310-\$530

Associates \$200-\$315

Lewis, Rice & Fingersh (164), St. Louis

Partners \$225-\$440

Associates \$140-\$305

Lindquist & Vennium (185), Minneapolis

Partners \$280-\$450 (average \$367, median \$375)

Associates \$180-\$295 (average \$218, median \$210)

Firmwide (average \$309, median \$330)

Locke Lord Bissell & Liddell (707), Dallas
Partners \$375-\$975 (average \$527, median \$525)
Associates \$225-\$450 (average \$313, median \$300)
Firmwide (average \$433, median \$450)

Loeb & Loeb (310), New York
Partners \$450-\$925 (average \$651, median \$650)
Associates \$260-\$500 (average \$422, median \$425)
Firmwide (average \$534, median \$500)

Lowenstein Sandler (278), Roseland, N.J.
Partners \$400-\$765
Associates \$220-\$405

Luce, Forward, Hamilton & Scripps (187), San Diego
Partners \$350-\$650 (average \$483, median \$483)
Associates \$235-\$460 (average \$293, median \$280)
Firmwide (average \$397, median \$400)

Manatt, Phelps & Phillips (358), Los Angeles
Partners \$495-\$850 (average \$626, median \$620)
Associates \$290-\$505 (average \$407, median \$410)
Firmwide (average \$533) (median \$550)

Marshall, Dennehey, Warner, Coleman & Goggin (408), Philadelphia
Partners \$135-\$400
Associates \$120-\$300

McCarter & English (399), Newark, N.J.
Partners \$325-\$635 (average \$435, median \$440)
Associates \$215-\$395 (average \$280, median \$285)
Firmwide (average \$353, median \$345)

McElroy, Deutsch, Mulvaney & Carpenter (232), Morristown, N.J.
Partners \$295-\$450 (average \$250, median \$235)
Associates \$135-\$225 (average \$180, median \$165)
Firmwide (average \$195, median \$215)

McKee Nelson (202), New York
Partners \$665-\$995
Associates \$395-\$630

McKenna Long & Aldridge (435), Atlanta
Partners \$370-\$750 (average \$454)
Associates \$220-\$450 (average \$274)

Michael Best & Friedrich (229), Milwaukee
Partners \$235-\$620 (average \$391, median \$375)
Associates \$190-\$330 (average \$252, median \$245)
Firmwide (average \$340, median \$305)

Miller, Canfield, Paddock and Stone (387), Detroit
Partners \$275-\$620 (average \$425, median \$425)
Associates \$165-\$375 (average \$240, median \$240)
Firmwide (average \$347, median \$355)

Miller & Martin (198), Chattanooga, Tenn.
Partners \$210-\$610 (average \$354, median \$360)
Associates \$180-\$305 (average \$210, median \$205)
Firmwide (average \$316, median \$330)

Montgomery, McCracken, Walker & Rhoads (151), Philadelphia
Partners \$360-\$585 (average \$440)
Associates \$195-\$365 (average \$270)
Firmwide (average \$360)

Moore & Van Allen (300), Charlotte, N.C.
Partners \$280-\$770 (average \$425, median \$410)
Associates \$180-\$365 (average \$256, median \$250)
Firmwide (average \$283, median \$273)

Nexsen Pruet (174), Columbia, S.C.
Partners \$250-\$450
Associates \$170-\$250

Nixon Peabody (699), Boston
Partners \$565-\$845 (average \$570, median \$590)
Associates \$230-\$350 (average \$370, median \$365)
Firmwide (average \$468, median \$430)

Ogletree, Deakins, Nash, Smoak & Stewart (428), Greenville, S.C.
Partners \$275-\$600 (average \$367)
Associates \$185-\$380 (average \$266)
Firmwide (average \$325)

Patton Boggs (529), Washington
Partners \$360-\$990 (average \$586, median \$570)
Associates \$244-\$535 (average \$372, median \$385)
Firmwide (average \$440, median \$455)

Pepper Hamilton (514), Philadelphia
Partners \$385-\$795
Associates \$240-\$395

Perkins Cole (632), Seattle
Partners \$260-\$785 (average \$498)
Associates \$165-\$515 (average \$329)

Phelps Dunbar (258), New Orleans
Partners \$170-\$450 (average \$256, median \$250)
Associates \$130-\$260 (average \$171, median \$165)
Firmwide (average \$213, median \$205)

Phillips Lytle (179), Buffalo, N.Y.
Partners \$250-\$475 (average \$334, median \$330)
Associates \$155-\$355 (average \$230, median \$220)
Firmwide (average \$288, median \$300)

Polsinelli Shalton Flanigan Suelthaus (304), Kansas City, Mo.
Partners \$250-\$600
Associates \$175-\$275

Quarles & Brady (450), Milwaukee
Partners \$280-\$625 (average \$419, median \$420)
Associates \$200-\$375 (average \$252, median \$245)
Firmwide (average \$347, median \$342)

Reed Smith (1,558*), Pittsburgh
Partners \$375-\$900 (average \$626, median \$585)
Associates \$235-\$580 (average \$423, median \$390)
Firmwide (average \$441, median \$425)

(*National Association for Law Placement figure. The firm recently reported an attorney count of 1,505.)

Robinson & Cole (215), Hartford, Conn.
Partners \$320-\$650 (average \$436, median \$440)
Associates \$210-\$350 (average \$276, median \$275)
Firmwide (average \$346, median \$350)

Roetzel & Andress (227), Akron, Ohio
Partners \$225-\$500 (average \$333, median \$325)
Associates \$170-\$295 (average \$219, median \$215)
Firmwide (average \$292, median \$300)

Rutan & Tucker (140), Costa Mesa, Calif.
Partners \$315-\$635
Associates \$220-\$370

Saul Ewing (231), Philadelphia
Partners \$295-\$800 (average \$441, median \$430)
Associates \$205-\$535 (average \$285, median \$255)
Firmwide (average \$372, median \$380)

Schnader Harrison Segal & Lewis (189), Philadelphia
Partners \$275-\$625
Associates \$160-\$375

Schulte Roth & Zabel (481), New York
Partners \$695-\$895 (average \$770, median \$755)
Associates \$255-\$650 (average \$495, median \$510)
Firmwide (average \$550, median \$530)

Sedgwick, Detert, Moran & Arnold (380), San Francisco
Partners \$295-\$650 (average \$398, median \$380)
Associates \$185-\$390 (average \$262, median \$260)
Firmwide (average \$318, median \$300)

Sheppard, Mullin, Richter & Hampton (458), Los Angeles
Partners \$475-\$795
Associates \$275-\$455 (up to \$580 in New York)

Shughart Thomson & Kilroy (179), Kansas City, Mo.
Partners \$240-\$500
Associates \$185-\$245

Shumaker, Loop & Kendrick (180), Toledo, Ohio
Partners \$225-\$500 (average \$329, median \$325)
Associates \$185-\$380 (average \$227, median \$225)
Firmwide (average \$297, median \$315)

Shutts & Bowen (203), Miami
Partners \$190-\$540
Associates \$190-\$240

Sills Cummis & Gross (165), Newark, N.J.
Partners \$395-\$725
Associates \$215-\$425

Smith, Gambrell & Russell (181), Atlanta
Partners \$260-\$595
Associates \$155-\$335

Snell & Wilmer (440), Phoenix
Partners \$300-\$725 (average \$444)
Associates \$170-\$420 (average \$271)
Firmwide (average \$354)

Steptoe & Johnson LLP (506), Washington
Partners \$350-\$895 (average \$591, median \$580)
Associates \$210-\$685 (average \$384, median \$395)
Firmwide (average \$477, median \$470)

Steptoe & Johnson PLLC (182), Clarksburg, W.Va.
Partners \$200-\$325
Associates \$170-\$250

Stinson Morrison Hecker (324), Kansas City, Mo.
Partners \$275-\$680 (average \$363, median \$373)
Associates \$190-\$290 (average \$224, median \$228)
Firmwide (average \$293, median \$275)

Winstead (281), Dallas

Partners \$365-\$655 (average \$465)

Associates \$215-\$385 (average \$282)

Firmwide (average \$390)

Winston & Strawn (1,004), Chicago

Partners \$400-\$975 (average \$622)

Associates \$210-\$625 (average \$376)

Firmwide (average \$448)

Womble Carlyle Sandridge & Rice (505), Winston-Salem, N.C.

Partners \$285-\$750 (average \$448, median \$450)

Associates \$140-\$370 (average \$275, median \$275)

Firmwide (average \$248, median \$200)

Wyatt Tarrant & Combs (198), Louisville, Ky.

Partners \$225-\$450 (average \$340, median \$345)

Associates \$180-\$255 (average \$210, median \$210)

Firmwide (average \$300, median \$310)

EXHIBIT 5

LAFFEY MATRIX

History

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			Years Out of Law School *				
Year	Adjustmt Factor**	Paralegal/ Law Clerk	1-3	4-7	8-10	11-19	20 +
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
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The methodology of calculation and benchmarking for this Updated Laffey Matrix has been approved in a number of cases. See, e.g., *McDowell v. District of Columbia*, Civ. A. No. 00-594 (RCL), LEXSEE 2001 U.S. Dist. LEXIS 8114 (D.D.C. June 4, 2001); *Salazar v. Dist. of Col.*, 123 F.Supp.2d 8 (D.D.C. 2000).

* "Years Out of Law School" is calculated from June 1 of each year, when most law students graduate. "1-3" includes an attorney in his 1st, 2nd and 3rd years of practice, measured from date of graduation (June 1). "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 "1-3" from June 1, 1996 until May 31, 1999, would move into tier "4-7" on June 1, 1999, and tier "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 6

SALARY TABLE 2020-DCB
INCORPORATING THE 2.6% GENERAL SCHEDULE INCREASE AND A LOCALITY PAYMENT OF 30.48%
FOR THE LOCALITY PAY AREA OF WASHINGTON-BALTIMORE-ARLINGTON, DC-MD-VA-WV-PA
TOTAL INCREASE: 3.52%
EFFECTIVE JANUARY 2020

Annual Rates by Grade and Step

Grade	Step 1	Step 2	Step 3	Step 4	Step 5	Step 6	Step 7	Step 8	Step 9	Step 10
1	\$ 25,500	\$ 26,354	\$ 27,202	\$ 28,045	\$ 28,893	\$ 29,389	\$ 30,227	\$ 31,073	\$ 31,106	\$ 31,900
2	28,672	29,354	30,304	31,106	31,456	32,381	33,306	34,231	35,157	36,082
3	31,284	32,326	33,369	34,411	35,454	36,497	37,539	38,582	39,624	40,667
4	35,119	36,289	37,460	38,630	39,800	40,971	42,141	43,312	44,482	45,652
5	39,291	40,601	41,911	43,222	44,532	45,842	47,152	48,462	49,772	51,082
6	43,798	45,258	46,718	48,178	49,639	51,099	52,559	54,019	55,479	56,939
7	48,670	50,292	51,914	53,536	55,158	56,780	58,402	60,023	61,645	63,267
8	53,901	55,698	57,495	59,291	61,088	62,885	64,682	66,478	68,275	70,072
9	59,534	61,519	63,503	65,488	67,473	69,457	71,442	73,426	75,411	77,396
10	65,561	67,747	69,932	72,118	74,303	76,489	78,674	80,860	83,045	85,231
11	72,030	74,431	76,832	79,233	81,634	84,034	86,435	88,836	91,237	93,638
12	86,335	89,213	92,091	94,970	97,848	100,727	103,605	106,483	109,362	112,240
13	102,663	106,085	109,508	112,930	116,353	119,775	123,198	126,620	130,043	133,465
14	121,316	125,360	129,404	133,447	137,491	141,534	145,578	149,621	153,665	157,709
15	142,701	147,458	152,215	156,973	161,730	166,487	170,800 *	170,800 *	170,800 *	170,800 *

* Rate limited to the rate for level IV of the Executive Schedule (5 U.S.C. 5304 (g)(1)).

Applicable locations are shown on the 2020 Locality Pay Area Definitions page: <http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2020/locality-pay-area-definitions/>

EXHIBIT 7

SALARY TABLE 2020-LA
INCORPORATING THE 2.6% GENERAL SCHEDULE INCREASE AND A LOCALITY PAYMENT OF 32.41%
FOR THE LOCALITY PAY AREA OF LOS ANGELES-LONG BEACH, CA
TOTAL INCREASE: 3.33%
EFFECTIVE JANUARY 2020

Annual Rates by Grade and Step

Grade	Step 1	Step 2	Step 3	Step 4	Step 5	Step 6	Step 7	Step 8	Step 9	Step 10
1	\$ 25,877	\$ 26,744	\$ 27,605	\$ 28,460	\$ 29,321	\$ 29,824	\$ 30,674	\$ 31,532	\$ 31,567	\$ 32,372
2	29,096	29,788	30,752	31,567	31,921	32,860	33,799	34,738	35,677	36,615
3	31,747	32,805	33,863	34,920	35,978	37,036	38,094	39,152	40,210	41,268
4	35,638	36,826	38,014	39,201	40,389	41,577	42,764	43,952	45,140	46,328
5	39,873	41,202	42,531	43,861	45,190	46,520	47,849	49,178	50,508	51,837
6	44,446	45,928	47,409	48,891	50,373	51,854	53,336	54,818	56,299	57,781
7	49,390	51,036	52,682	54,328	55,974	57,620	59,265	60,911	62,557	64,203
8	54,699	56,522	58,345	60,168	61,992	63,815	65,638	67,462	69,285	71,108
9	60,415	62,429	64,443	66,457	68,471	70,484	72,498	74,512	76,526	78,540
10	66,531	68,749	70,966	73,184	75,402	77,620	79,838	82,056	84,274	86,492
11	73,096	75,532	77,968	80,405	82,841	85,277	87,714	90,150	92,586	95,023
12	87,612	90,533	93,454	96,375	99,296	102,217	105,138	108,058	110,979	113,900
13	104,182	107,655	111,128	114,601	118,074	121,547	125,020	128,493	131,966	135,440
14	123,111	127,214	131,318	135,421	139,524	143,628	147,731	151,835	155,938	160,041
15	144,812	149,639	154,467	159,295	164,122	168,950	170,800 *	170,800 *	170,800 *	170,800 *

* Rate limited to the rate for level IV of the Executive Schedule (5 U.S.C. 5304 (g)(1)).

Applicable locations are shown on the 2020 Locality Pay Area Definitions page: <http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2020/locality-pay-area-definitions/>

EXHIBIT 8

JUDICIARY SALARY PLAN
Washington-Baltimore-Arlington, DC-MD-VA-WV-PA - Table DCB
30.48% Locality Payment Included
Effective January 6, 2020

Grade	1	2	3	4	5	6	7	8	9	10
1	\$25,500	\$26,354	\$27,202	\$28,045	\$28,893	\$29,389	\$30,227	\$31,073	\$31,106	\$31,900
2	\$28,672	\$29,354	\$30,304	\$31,106	\$31,456	\$32,381	\$33,306	\$34,231	\$35,157	\$36,082
3	\$31,284	\$32,326	\$33,369	\$34,411	\$35,454	\$36,497	\$37,539	\$38,582	\$39,624	\$40,667
4	\$35,119	\$36,289	\$37,460	\$38,630	\$39,800	\$40,971	\$42,141	\$43,312	\$44,482	\$45,652
5	\$39,291	\$40,601	\$41,911	\$43,222	\$44,532	\$45,842	\$47,152	\$48,462	\$49,772	\$51,082
6	\$43,798	\$45,258	\$46,718	\$48,178	\$49,639	\$51,099	\$52,559	\$54,019	\$55,479	\$56,939
7	\$48,670	\$50,292	\$51,914	\$53,536	\$55,158	\$56,780	\$58,402	\$60,023	\$61,645	\$63,267
8	\$53,901	\$55,698	\$57,495	\$59,291	\$61,088	\$62,885	\$64,682	\$66,478	\$68,275	\$70,072
9	\$59,534	\$61,519	\$63,503	\$65,488	\$67,473	\$69,457	\$71,442	\$73,426	\$75,411	\$77,396
10	\$65,561	\$67,747	\$69,932	\$72,118	\$74,303	\$76,489	\$78,674	\$80,860	\$83,045	\$85,231
11	\$72,030	\$74,431	\$76,832	\$79,233	\$81,634	\$84,034	\$86,435	\$88,836	\$91,237	\$93,638
12	\$86,335	\$89,213	\$92,091	\$94,970	\$97,848	\$100,727	\$103,605	\$106,483	\$109,362	\$112,240
13	\$102,663	\$106,085	\$109,508	\$112,930	\$116,353	\$119,775	\$123,198	\$126,620	\$130,043	\$133,465
14	\$121,316	\$125,360	\$129,404	\$133,447	\$137,491	\$141,534	\$145,578	\$149,621	\$153,665	\$157,709
15	\$142,701	\$147,458	\$152,215	\$156,973	\$161,730	\$166,487	\$170,800 **	\$170,800 **	\$170,800 **	\$170,800 **
16	\$167,361	\$172,941	\$178,520	\$181,500 *	\$181,500 *	\$181,500 *	\$181,500 *	\$181,500 *	\$181,500 *	\$181,500 *
17	\$181,500 *	\$181,500 *	\$181,500 *	\$181,500 *	\$181,500 *	\$181,500 *	\$181,500 *	\$181,500 *	\$181,500 *	\$181,500 *
18	\$181,500 *	\$181,500 *	\$181,500 *	\$181,500 *	\$181,500 *	\$181,500 *	\$181,500 *	\$181,500 *	\$181,500 *	\$181,500 *

* Rate limited to the rate for Level III of the Executive Schedule.

** Rate limited to the rate for Level IV of the Executive Schedule.

EXHIBIT 9

JUDICIARY SALARY PLAN
Los Angeles-Long Beach, CA - Table LA
32.41% Locality Payment Included
Effective January 6, 2020

Grade	1	2	3	4	5	6	7	8	9	10
1	\$25,877	\$26,744	\$27,605	\$28,460	\$29,321	\$29,824	\$30,674	\$31,532	\$31,567	\$32,372
2	\$29,096	\$29,788	\$30,752	\$31,567	\$31,921	\$32,860	\$33,799	\$34,738	\$35,677	\$36,615
3	\$31,747	\$32,805	\$33,863	\$34,920	\$35,978	\$37,036	\$38,094	\$39,152	\$40,210	\$41,268
4	\$35,638	\$36,826	\$38,014	\$39,201	\$40,389	\$41,577	\$42,764	\$43,952	\$45,140	\$46,328
5	\$39,873	\$41,202	\$42,531	\$43,861	\$45,190	\$46,520	\$47,849	\$49,178	\$50,508	\$51,837
6	\$44,446	\$45,928	\$47,409	\$48,891	\$50,373	\$51,854	\$53,336	\$54,818	\$56,299	\$57,781
7	\$49,390	\$51,036	\$52,682	\$54,328	\$55,974	\$57,620	\$59,265	\$60,911	\$62,557	\$64,203
8	\$54,699	\$56,522	\$58,345	\$60,168	\$61,992	\$63,815	\$65,638	\$67,462	\$69,285	\$71,108
9	\$60,415	\$62,429	\$64,443	\$66,457	\$68,471	\$70,484	\$72,498	\$74,512	\$76,526	\$78,540
10	\$66,531	\$68,749	\$70,966	\$73,184	\$75,402	\$77,620	\$79,838	\$82,056	\$84,274	\$86,492
11	\$73,096	\$75,532	\$77,968	\$80,405	\$82,841	\$85,277	\$87,714	\$90,150	\$92,586	\$95,023
12	\$87,612	\$90,533	\$93,454	\$96,375	\$99,296	\$102,217	\$105,138	\$108,058	\$110,979	\$113,900
13	\$104,182	\$107,655	\$111,128	\$114,601	\$118,074	\$121,547	\$125,020	\$128,493	\$131,966	\$135,440
14	\$123,111	\$127,214	\$131,318	\$135,421	\$139,524	\$143,628	\$147,731	\$151,835	\$155,938	\$160,041
15	\$144,812	\$149,639	\$154,467	\$159,295	\$164,122	\$168,950	\$170,800 **	\$170,800 **	\$170,800 **	\$170,800 **
16	\$169,837	\$175,499	\$181,161	\$181,500 *	\$181,500 *	\$181,500 *	\$181,500 *	\$181,500 *	\$181,500 *	\$181,500 *
17	\$181,500 *	\$181,500 *	\$181,500 *	\$181,500 *	\$181,500 *	\$181,500 *	\$181,500 *	\$181,500 *	\$181,500 *	\$181,500 *
18	\$181,500 *	\$181,500 *	\$181,500 *	\$181,500 *	\$181,500 *	\$181,500 *	\$181,500 *	\$181,500 *	\$181,500 *	\$181,500 *

* Rate limited to the rate for Level III of the Executive Schedule.

** Rate limited to the rate for Level IV of the Executive Schedule.

EXHIBIT 10

U.S. OFFICE OF PERSONNEL MANAGEMENT

PAY & LEAVE SALARIES & WAGES

2020 Locality Pay Area Definitions

Below is a list of the GS locality pay areas applicable in January 2020 and the locations composing them. Most of the locations listed are counties. The Federal Information Processing Standards (FIPS) geographic codes consist of a two-digit State and three-digit county identifier. These geographic codes are derived from the Worldwide Geographic Location Codes, 1993. The only exceptions to the use of State/county codes in the locations listed below are -

- State codes are used for the Alaska and Hawaii locality pay areas, and
- State, city, and county codes are listed for -
 - Sullivan City, MO, in the St. Louis-St. Charles-Farmington, MO-IL, locality pay area, and
 - Three duty stations representing Joint Base McGuire-Dix-Lakehurst in the New York-Newark, NY-NJ-CT-PA, locality pay area.

Note: Section 1911 of P.L. 111-84, the Non-Foreign Area Retirement Equity Assurance Act of 2009, phased in locality pay for employees in the non-foreign areas as identified in 5 C.F.R. 591.205. Alaska and Hawaii are separate locality pay areas with separate pay tables. Other non-foreign areas are included as part of the Rest of U.S. locality pay area.

- Alaska
- Albany-Schenectady, NY-MA
- Albuquerque-Santa Fe-Las Vegas, NM
- Atlanta--Athens-Clarke County--Sandy Springs, GA-AL
- Austin-Round Rock, TX
- Birmingham-Hoover-Talladega, AL
- Boston-Worcester-Providence, MA-RI-NH-ME
- Buffalo-Cheektowaga, NY
- Burlington-South Burlington, VT
- Charlotte-Concord, NC-SC
- Chicago-Naperville, IL-IN-WI
- Cincinnati-Wilmington-Maysville, OH-KY-IN
- Cleveland-Akron-Canton, OH
- Colorado Springs, CO
- Columbus-Marion-Zanesville, OH
- Corpus Christi-Kingsville-Alice, TX
- Dallas-Fort Worth, TX-OK

- Davenport-Moline, IA-IL
- Dayton-Springfield-Sidney, OH
- Denver-Aurora, CO
- Detroit-Warren-Ann Arbor, MI
- Harrisburg-Lebanon, PA
- Hartford-West Hartford, CT-MA
- Hawaii
- Houston-The Woodlands, TX
- Huntsville-Decatur-Albertville, AL
- Indianapolis-Carmel-Muncie, IN
- Kansas City-Overland Park-Kansas City, MO-KS
- Laredo, TX
- Las Vegas-Henderson, NV-AZ
- Los Angeles-Long Beach, CA
- Miami-Fort Lauderdale-Port St. Lucie, FL
- Milwaukee-Racine-Waukesha, WI
- Minneapolis-St. Paul, MN-WI
- New York-Newark, NY-NJ-CT-PA
- Omaha-Council Bluffs-Fremont, NE-IA
- Palm Bay-Melbourne-Titusville, FL
- Philadelphia-Reading-Camden, PA-NJ-DE-MD
- Phoenix-Mesa-Scottsdale, AZ
- Pittsburgh-New Castle-Weirton, PA-OH-WV
- Portland-Vancouver-Salem, OR-WA
- Raleigh-Durham-Chapel Hill, NC
- Richmond, VA
- Sacramento-Roseville, CA-NV
- San Antonio-New Braunfels-Pearsall, TX
- San Diego-Carlsbad, CA
- San Jose-San Francisco-Oakland, CA
- Seattle-Tacoma, WA
- St. Louis-St. Charles-Farmington, MO-IL
- Tucson-Nogales, AZ
- Virginia Beach-Norfolk, VA-NC
- Washington-Baltimore-Arlington, DC-MD-VA-WV-PA
- Rest of U.S.

Alaska

PLACE NAME

FIPS

PLACE NAME**FIPS**

Mohave County, AZ

04015

[Back to Top](#)**Los Angeles-Long Beach, CA****PLACE NAME****FIPS**

Kern County, CA

06029

Los Angeles County, CA

06037

Orange County, CA

06059

Riverside County, CA

06065

San Bernardino County, CA

06071

San Luis Obispo County, CA

06079

Santa Barbara County, CA

06083

Ventura County, CA

06111

[Back to Top](#)**Miami-Fort Lauderdale-Port St. Lucie, FL****PLACE NAME****FIPS**

Broward County, FL

12011