

Joseph Lavi (State Bar No. 209776)
jlavi@lelawfirm.com
Vincent C. Granberry (State Bar No. 276483)
vgranberry@lelawfirm.com
Antonia McKee (State Bar No. 344511)
abliznets@lelawfirm.com
LAVI & EBRAHIMIAN, LLP
8889 W. Olympic Blvd., Suite 200
Beverly Hills, California 90211
Tel: (310) 432-000 / Fax: (310) 432-0001

Attorneys for Plaintiff CHRISTIAN HERNANDEZ

[Additional counsel listed on following page]

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

ANDREW ZUBIA, DANA MARIE GANAL,
CHRISTIAN HERNANDEZ, and MICHAEL
WOODS, individually, on a representative basis,
and on behalf of other members of the public
similarly situated;

Plaintiffs,

vs.

PROCTER & GAMBLE COMPANY, an Ohio
Corporation; PROCTER & GAMBLE
DISTRIBUTING LLC, an Ohio Company; and
DOES 1 through 20, inclusive.

Defendants.

Case No.: CIVSB2208601

CLASS ACTION

*[Assigned for all purposes to the Hon. Lawrence
P. Riff, Dept. 7]*

**DECLARATION OF ANTONIA MCKEE
IN SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT AND MOTION
FOR AWARD OF ATTORNEYS' FEES
AND COSTS**

Hearing Information:

Date: January 17, 2024

Time: 10:00 a.m.

Dept.: 7

Brian J. Mankin, Esq. [CSB No. 216228]
brian@lmlfirm.com
Misty M. Lauby, Esq. (SBN 243009)
misty@lmlfirm.com
LAUBY, MANKIN & LAUBY, LLP
5198 Arlington Avenue, PMB 513
Riverside, CA 92504
Tel: (951) 320-1444 | Fax: (951) 320-1445

Attorneys for Plaintiff ANDREW ZUBIA

MOON LAW GROUP
Kane Moon, Esq. (SBN 249834)
Allen V. Feghali, Esq. (SBN 301080)
Edwin Kamarzaran, Esq. (SBN 32780)
T: (213) 232-3128
F: (213) 232-3125
Kane.Moon@moonyanglaw.com
Allen.Feghali@moonyanglaw.com
Edwin.Kamarzarian@moonyanglaw.com

Attorneys for Plaintiff DANA Marie Ganal

SCHNEIDER WALLACE COTTRELL KONECKY LLP
Carolyn H. Cottrell, Esq.
Ori Edelstein, Esq.
Andrew D. Weaver, Esq.
Phillippe M. Gaurard, Esq.
T: (415) 421-7100
F: (415) 421-7105
ccottrell@schneiderwallace.com
oedelstein.schneiderwallace.com
aweaver@schneiderwallace.com
pgaurard@schneiderwallace.com

Attorneys for Plaintiff Michael Woods

DECLARATION OF ANTONIA MCKEE

I, Antonia McKee, 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 with the law firm Lavi & Ebrahimi, LLP, Counsel for Plaintiff CHRISTIAN HERNANDEZ (“Plaintiff”) in this action, and I am an attorney on this case. Based on my assignment to this case and familiarity with the file in this matter; 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.

2. This Declaration is submitted in support of Plaintiff’s Motion for Final Approval of Class Action Settlement and Motion for Award of Attorneys’ Fees and Costs. The named Plaintiff worked as an hourly-paid, non-exempt employee of Defendants and seeks to represent approximately 1327 current and former hourly-paid, non-exempt employees employed by Defendants who worked at the Proctor & Gamble Distributing LLC (“P&G”) Facility in Moreno Valley, California as hourly-paid, non-exempt employees at any time during the Class Period (hereinafter “Class” or “Class Members”).

3. On April 2, 2021, Plaintiff filed a class action pursuant to complaint against Defendants for alleged violations of the California Labor Code in the Los Angeles County Superior Court against Defendant (the “Hernandez Action”). Plaintiff alleged the following: (1) Failure to Pay Wages for All Hours Worked in Violation of Labor Code Sections 1194 and 1197; (2) Failure to Pay Overtime Wages for Daily Overtime Worked in Violation of Labor Code Sections 510 and 1194; (3) Failure to Authorize or Permit Meal Periods in Violation of Labor Code Sections 512 and 226.7; (4) Failure to Authorize or Permit Rest Periods in Violation of Labor Code Section 226.7; (5) Failure to Timely Pay Earned Wages During Employment in Violation of Labor Code Section 204; (6) Failure to Provide Complete and Accurate Wage Statements in Violation of Labor Code Section 226; (7) Failure to Timely Pay All Earned Wages and Final Paychecks Due at Time of Separation of Employment in Violation of Labor Code Sections 201, 202, and 203; and (8) Unfair Business Practices in Violation of Business and Professions Code Section 17200, et seq. Defendant has denied all claims in the Class Action.

4. On April 2, 2021, Plaintiff also submitted a notice to the LWDA informing it of his intention to bring a claim for civil penalties pursuant to the Private Attorneys General Act of 2004 (“PAGA”) Case No. CVRI2103855.

5. On August 12, 2021, Plaintiff filed a complaint for civil penalties pursuant to PAGA, Case No. CVRI2103855, and filed his Complaint in District Court for the Central District of California, Case No. 5:21-cv-00921-FMO-SP.

6. In or about December 2021, a joint prosecution agreement was entered into between Moon & Yang, Schneider Wallace Cottrell Konecky LLP, Lauby, Mankin & Lauby LLP, and Plaintiff's counsel, Lavi & Ebrahimi LLP.

7. On March 30, 2022, after formal and informal discovery and data exchange, the Parties attended a mediation session along with mediator Carl J. West, a well-respected mediator experienced in mediating wage and hour class and representative actions, and co-counselors from Moon & Yang, Schneider Wallace Cottrell Konecky LLP, Lauby, and Mankin & Lauby LLP. After a full day of arm's-length negotiations, and subsequent ongoing negotiations, the Parties reached an agreement in November 2022 in all four actions.

8. The Parties moved to Consolidate the cases in March 2023, in the instant Action, Case No. 20STCV44506.

9. On May 26, 2023, the Court entered an Order Granting Preliminary Approval of Class Action Settlement. Thereafter, through the Settlement Administrator, the notice administration process commenced.

EXPERIENCE OF CLASS COUNSEL

10. Lavi & Ebrahimian, 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.

11. I, and the law firm of Lavi & Ebrahimian, LLP, have almost exclusively practiced in the area of labor and employment law. I graduated from the University of California, Davis in 2014 and received my Juris Doctorate from Southwestern Law School, graduating with CALI honors in 2021.

1 12. I am familiar with the experience of Joseph Lavi who graduated from law school in
2 2000 and have handled numerous cases in all aspects of employment and labor law, including state
3 and federal class actions, wrongful termination, discrimination, harassment, and retaliation cases. He
4 is a managing partner of the firm and was lead counsel on this matter and has been practicing law for
5 nearly 20 years.

6 13. I am familiar with the experience of Vincent C. Granberry, who graduated from Sandra
7 Day O'Connor College of Law at Arizona State University in 2010. He has been in practice in
8 California since 2011 and with the law firm of Lavi & Ebrahimian, LLP since April 2014, focusing
9 almost exclusively in the area of employment law. Over the last nine years, his practice has focused
10 nearly exclusively on wage and hour class action litigation with a handful of consumer class actions.
11 Super Lawyers Magazine has selected him as a Southern California Rising Star in 2016 through 2023
12 and as a Super Lawyers Rising Star Up-And-Coming 100 in my field in 2018, and again from 2020
13 through 2023.

14 14. Mr. Lavi has tried employment cases in State and Federal court, and has argued before
15 various Courts of Appeals, on employment issues such as validity of Arbitration Agreements,
16 Application of Res Judicata in class action cases, and other employment issues. He has been a panelist
17 and/or speaker for various Employment Law Continuing Legal Education Panels on issues of
18 employment law trials, how to proceed and conduct trials, and proving and winning punitive damages.
19 He has been named a Southern California Super Lawyer in the area of Plaintiff's employment
20 litigation for Class Actions from 2011-2022. He has settled dozens of wage and hour class actions
21 and am currently Plaintiff's counsel in many others. Some of the class actions that he handled against
22 employers on wage and hour issues and have been approved as class counsel include cases against
23 the following: Kaiser Permanente which settled for \$6,510,000.00; Hustler Casino which settled for
24 \$980,000.00; Chevron Stations Inc. which settled for \$4,500,000.00; Commerce Casino which settled
25 for \$1,575,000.00; BP West Coast Products which settled for \$4,000,000.00; Kaiser Permanente which
26 settled for \$3,600,000.00; Fuddruckers (as lead counsel) which settled for \$900,000.00; Movado
27 Retail Group, Inc. (as lead counsel) which settled for \$728,000.00; Chuck-E-Cheese's (as lead
28 counsel) which settled for \$1,900,000.00; Aero-Electric Connector, Inc. (as lead counsel) which

1 settled for \$1,500,000.00; Clougherty Packing, LLC (as lead counsel) which settled for
2 \$4,250,000.00; and Gruma Corporation (as lead counsel) which Defendants' petition to the United
3 States Supreme Court in the matter was denied and the matter settled for \$2,300,000.00. Mr. Lavi has
4 been approved as class counsel by both Federal and California Courts. I and the other attorneys at
5 Lavi & Ebrahimian who are available to assist me in this case if needed are fully capable of adequately
6 and fairly representing Plaintiffs and the proposed class in this matter.

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

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

11 b. *Santana v. El Pollo Loco, Inc.*, Los Angeles Superior Court Case No.
12 BC369846;

13 c. *Edlin, et al. v. Fuddruckers, Inc.*, United States District Court, Central District
14 of California, Case No. CV-07-3678-ABC;

15 d. *Chavez, et al. vs. CEC Entertainment, Inc. d/b/a Chukee-Cheeses*, Los Angeles
16 Superior Court Case No. BC380996;

17 e. *Bustamante, et al. v. Teamone Employment Specialists*, Los Angeles Superior
18 Court Case No. BC383266;

19 f. *Cervantes, et al. v. Kaiser Foundation Hospitals, Inc.*, Alameda Superior Court
20 Case No. RG 0265835;

21 g. *Seng Savang v. Club One Casino*, Fresno Superior Court Case No.
22 05CECG02189;

23 h. *Norman, et al. v. Movado Retail Group, Inc.*, United States District Court,
24 Central District of California, Case No. CV08-06691 SVW (PLA);

25 i. *Shand v. G.A.L.A., Inc. dba Giorgio Armani*, Los Angeles Superior Court Case
26 No. BC342588;

27 g. *Solis v. Plycraft Industries, Inc.*, Los Angeles Superior Court Case No.
28 BC374816;

1 h. *Campos v. HWB Carwash, Inc.*, Los Angeles Superior Court Case No.
2 BC378990;
3 i. *Acosta, et al. v. Texwood Industries*, United States District Court, Central
4 District of California, Case No. CV07-3237-DDP (PLAX);
5 h. *Arevalo v. Gruma Corporation*, Los Angeles Superior Court Case No.
6 BC410322;
7 j. *Burrola v. American Promotional Events*, Los Angeles Superior Court Case
8 No. BC412315;
9 k. *Cortez v. Trader Distribution Services*, Los Angeles Superior Court Case No.
10 BC397208;
11 l. *Cueva v. Allied Industries, Inc.*, Los Angeles Superior Court Case No.
12 BC399431;
13 m. *Del Toro v. Petco Animal Supplies, Inc.*, San Diego Superior Court Case No.
14 37-2009-00103626-CU-OE-CTL;
15 n. *Garcia v. Home Cooking, Inc.*, Los Angeles Superior Court Case No.
16 BC451148;
17 o. *Alcantar v. Amerimax Building Products, Inc.*, United States District Court,
18 Central District of California, Case No. CV 10-8916 DDP (CWx);
19 p. *Arancivias v. Clougherty Packaging, LLC dba Farmer John*, Los Angeles
20 Superior Court Case No. BC432406;
21 q. *Barajas v. Menzies Aviation, Inc.*, United States District Court, Central District
22 of California, Case No CV-10-02315-JEM;
23 r. *Barrera v. BHFC Operating, LLC dba Bottega Louie*, Los Angeles Superior
24 Court Case No. BC462603;
25 s. *Camacho v. American Textile Maintenance Co.*, Los Angeles Superior
26 Court Case No. BC452570;
27 t. *Cortes v. Monsanto Company*, Ventura Superior Court Case No. 56-2010-
28 00366952-CU-OE-VTA;

1 u. *Escobar v. Aero-Electric Connector, Inc.*, Los Angeles Superior Court Case
2 No. BC421009;
3 v. *Gomez v. Bacara Resort & Spa*, Santa Barbara Superior Court Case No.
4 1341987;
5 w. *Gonzalez v. Ashley Furniture Industries, Inc.*, Los Angeles Superior Court
6 Case No. BC425708;
7 x. *Gonzalez v. Burrtec Waste Industries, Inc.*, Los Angeles Superior Court Case
8 No. BC436879;
9 y. *Gutierrez v. Visterra Credit Union*, Riverside Superior Court Case No.
10 RIC10020183;
11 z. *Hernandez v. Kruse & Son, Inc.*, Los Angeles Superior Court Case No.
12 BC411849;
13 aa. *Lopez v. Tecno Industrial Engineering*, Los Angeles Superior Court Case No.
14 BC411134;
15 bb. *Lowanga v. Continental Currency Services, Inc.*, Orange County Superior
16 Court Case No. 30-2011-0044011-CU-OE-CXC;
17 cc. *Aguilar v. PLS Financial Services, Inc.*, United States District Court, Central
18 District of California, Case No. CV 10-0415 ODW (FMOx);
19 dd. *Lozada v. Classic Party Rentals, Inc.*, Los Angeles Superior Court Case No.
20 BC443792;
21 ee. *Madrid v. OPI Products, Inc.*, Los Angeles Superior Court Case No.
22 BC451489;
23 ff. *Martinez v. J. Fletcher Creamer & Son, Inc.*, United States District Court Case
24 No. CV 10-0968-PSG-FMOX;
25 gg. *Martinez v. Administaff Companies II, L.P.*, Los Angeles Superior Court Case
26 No. BC425799;
27 hh. *Martinez v. Morgans Hotel Group Management, LLC*, Los Angeles Superior
28 Court Case No. BC446744;

1 jj. *Sanchez v. La Brea Bakery, Inc.*, Los Angeles Superior Court Case No.
2 BC456420;
3 ii. *Montenegro v. Ruggeri Marble and Granite, Inc.*, United States District Court,
4 Central District of California, Case No. CV-10-00711 JFW (PLAx);
5 kk. *Reed v. 99 Cents Only Stores*, Los Angeles Superior Court Case No.
6 BC436793;
7 ll. *Santos v. Noble Management Group-California, LLC*, United States District
8 Court, Central District of California, Case No. CV 10-2594 DSF (VBKx);
9 mm. *Taylor v. U.S. Healthworks Holding Company, Inc.*, Orange County Superior
10 Court Case No. 30-2011-00473505;
11 nn. *Valencia Diaz v. Gene Wheeler Farms, Inc.*, Los Angeles Superior Court Case
12 No. BC436235;
13 oo. *Zad-Behtooie v. Valley Village*, Los Angeles Superior Court Case No.
14 BC451490;
15 pp. *Bell v. Aidells Sausage Company, Inc.*, Alameda Superior Court Case No.
16 RG10523946;
17 qq. *Negrete v. Cenveo, Inc.*, United States District Court, Central District of
18 California, Case No. CV 11-09543 DSF (MRWx);
19 rr. *Bejar v. Exopack-Ontario, Inc.*, Orange County Superior Court Case No. 30-
20 2011-00518396-CU-OE-CXC;
21 ss. *Aguilar v. PLS Financial Services, Inc.*, United States District Court, Central
22 District of California, Case No. CV 10-0415 ODW (FMOx);
23 tt. *Sparks v. Larry Flynt dba Hustler Casino*, Los Angeles Superior Court Case
24 No. BC320172;
25 uu. *Morris v. Chevron Stations, Inc.*, Los Angeles Superior Court Case No.
26 BC361380;
27 vv. *Marino v. BP West Coast Products, LLC*, Los Angeles Superior Court Case
28 No. BC357987

1 CONTRIBUTION OF PLAINTIFF AND REASONABLENESS OF THE REQUESTED

2 SERVICE PAYMENT

3 16. It is imperative that Plaintiff obtain just compensation for the time, effort and risk
4 associated with his fiduciary duties as class representative and named Plaintiff. Here, the requested
5 enhancement is relatively modest, reasonable, and should be approved. The requested award of Seven
6 Thousand Five Hundred Dollars and Zero Cents (\$7,500.00) to Plaintiff is only a small portion of the
7 total settlement amount. Plaintiff has performed considerable services on behalf of the Class during
8 the litigation by seeking an attorney, searching for and providing information related to his
9 employment and the employment conditions, spending time in meetings with counsel to get a better
10 understanding of his work environment and requirements, making himself available during the
11 mediation session, and approving the settlement on behalf of all class members. Plaintiff reviewed
12 the settlement agreement and stayed up to date with the case status after the settlement was reached.
13 As such, the requested payment is warranted for his time and effort when the class members are able
14 to receive significant monetary compensation as a result of Plaintiff's efforts, as well as the fact that
15 he put himself at significant risk for liability for costs in this matter if Defendant was the prevailing
16 party in the litigation as well as for retaliation by other employers who may discover and find it to be
17 unappealing that he was a Class Representative in a lawsuit against Defendant, his former employer.
18 Therefore, Plaintiff's requested payment should be approved.

19 ATTORNEYS' FEES

20 17. I and other attorneys at Lavi & Ebrahimian LLP made every effort to litigate this action
21 in an efficient and cost-effective manner. Following review of our case file and hours and discussions
22 with counsel, our firm has spent approximately 75 hours on this matter.

23 18. Given Mr. Lavi's years of experience, his trial and appellate experience, and the focus
24 of his practice, if he were to charge for this type of work by the hour, his current hourly rate would
25 be \$925 per hour. This rate is the firm's current billing rate and is supported by the extensive and
26 specialized experience in these types of cases and recognized expertise described. I have personal
27 knowledge of the hourly rates charged by other attorneys with comparable experience to Mr. Lavi's.
28 Based on that information, I believe that his rate and other attorneys at Lavi & Ebrahimian rates are

1 fully consistent with the market rate for attorneys with comparable expertise, experience, and
2 qualifications. Based on the information I have, I believe that our rates are reasonable and appropriate
3 fees for Los Angeles attorneys with comparable expertise, experience, and qualifications.

4 19. The hourly rates of the attorneys, \$500 for myself, and \$650 for Vincent Granberry
5 are in line with rates approved for attorneys in this jurisdiction with similar experience. A reasonable
6 hourly rate is the prevailing rate charged by attorneys of similar skill and experience in the relevant
7 community. (*PLCM Group, Inc. v. Drexler* (2000) 22 Cal. 4th 1084, 1095; *Hopson v. Hanesbrands*
8 *Inc.* (N.D. Cal. Apr. 3, 2009, No. CV08-0844 EDL) 2009 U.S. Dist. LEXIS 33900.)

9 20. Plaintiff's Counsel's rates are also in line with the Laffey Matrix which states a rate of
10 \$747 per hour for attorneys out of law school 11-19 years and \$899 per hour for attorneys out of law
11 school over 20 years. (See <http://www.laffeymatrix.com/see.html>.) California Courts have applied
12 the Laffey Matrix with adjustments to the specific California locality where the Counsel's office is
13 located based on "Locality Pay Tables." (See e.g., *Syers Properties III, Inc. v. Rankin* (2014) 226
14 Cal.App.4th 691, 695-696 [affirming fee award based on Laffey Matrix with upward 9 percent rate
15 adjustment from D.C. area compared to San Francisco Bay Area based on Locality Pay Tables]; *In*
16 *re HPL Techs., Inc., Secs. Litig.* (N.D. Cal. April 22, 2005, No. C-02-3510 VRW) 365 F.Supp.2d 912,
17 921-922 [using Laffey Matrix with upward adjustment of 9 percent for San Francisco based on
18 difference between D.C. Area's +15.98 locality pay compared to San Francisco's +26.39 percent
19 locality pay differential from the federal courts' "Judiciary Salary Plan Pay Tables."].) Here,
20 Plaintiff's Counsel's office is located in Los Angeles County. For 2018, the Locality Pay Tables (and
21 Judiciary Salary Plan Pay Tables referred to in *In re HPL Techs., Inc.*), state a 2.35 percent increase
22 for the Los Angeles-Long Beach, CA area which includes the following counties: Kern County, Los
23 Angeles County, Orange County, Riverside County, San Bernardino County, Santa Barbara County,
24 and Ventura County. (Ex. 7, 8 [2018 Locality Pay Tables for Washington-Baltimore-Arlington and
25 Los Angeles-Long Beach, CA available at [https://www.opm.gov/policy-data-oversight/pay-](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2018/general-schedule/)
26 [leave/salaries-wages/2018/general-schedule/](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2018/general-schedule/)]; Ex. 9, 10 [Judiciary Salary Plan Pay Tables available
27 at <http://www.uscourts.gov/careers/compensation/judiciary-salary-plan-pay-rates>]; Ex. 11 [2018
28 Locality Pay Area Definitions defining counties within Los Angeles-Long Beach, CA area available

at <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 working in Kern County, Los Angeles County, Orange County, Riverside County, San Bernardino County, Santa Barbara County, and Ventura County over the Washington-Baltimore area stated in the Laffey Matrix, the Laffey Matrix states the following relevant rates: \$468 for attorneys 4 to 5 years out of law school, \$676 for attorneys 8 to 10 years out of law school, \$764 for attorneys 11 to 19 years out of law school, and \$920 for attorneys 20 plus years out of law school.

21. In summary form, counsel's many tasks included the following: pre-filing investigation, legal research, and research of Defendant; meeting and communicating with Plaintiff regarding his responsibility in bringing the action, the facts of his case, his employment, his work environment, their documents pleadings; reviewing Plaintiff's file and determining liability and evaluating claim and defense strengths and weaknesses; legal research of case law and wage orders regarding applicable claims and defenses; meeting and conferring over informal discovery and the mediation session; drafting notices for litigation; evaluating Defendant's policies; determining case strategy; communicating with Defendant's Counsel and Co-Counsel; analyzing data and information provided in informal discovery; calculating damages; negotiating settlement and settlement documents; reviewing the motion for preliminary approval and supporting documents; meeting with client regarding approval of the settlement; reviewing motion for final approval and drafting supporting documents. All of the tasks and work performed were reasonable and necessary to the prosecution of this case and justified, particularly in light of the result achieved.

22. Plaintiff's fee request is reasonable under the lodestar method. Under the lodestar method, a base fee amount is calculated from a compilation of time reasonably spent on the case and the reasonable hourly compensation of the attorney. The base amount is then adjusted in light of various factors. (*Serrano v. Priest* (1977) 20 Cal.3d 25, 48, (*Serrano III*).)

The breakdown of the hours worked by counsel in this matter is set forth as follows:

Attorney	Hours	Hourly Rate	Lodestar
Joseph Lavi	20	\$925	\$18,500.00
Vincent C. Granberry	38	\$675	\$25,650.00

1	Antonia McKee	17	\$500	\$8,500.00
2	Total	75	--	\$52,650.00

3

4 23. Working closely with the other attorneys in my firm, including on motions for

5 attorneys' fees, I am aware of the experience and achievements of the counsel involved in this matter

6 as well as the rates which would be charged if our work was on an hourly basis. Having reviewed

7 declarations in support of fee applications in Los Angeles, I also have knowledge of hourly rates

8 charged by other attorneys practicing in the field of employment law in Los Angeles. Based on that

9 information, I believe that my rate and the rates of the attorneys in my firm are fully consistent with

10 the market rate for attorneys with comparable expertise, experience, and qualifications. Based on the

11 information I have, I believe that the rates of our firm are reasonable and appropriate fees for Los

12 Angeles attorneys with comparable expertise, experience, and qualifications.

13 24. There are additional hours devoted to this litigation by my office that are not reflected

14 in the foregoing lodestar, including additional time that will be spent to obtain and monitor final

15 approval of the proposed settlement and requested awards, oversee the settlement administration

16 process and distribution of funds, respond to Class Member inquiries, and communicate with co-

17 counsel and Plaintiff Hernandez regarding the case. My office also bears the risk of taking whatever

18 actions are necessary if Defendants fail to pay.

19 25. Based on the documents and data reviewed, and the experience of myself and other

20 attorneys at Lavi & Ebrahimian LLP, counsel for Plaintiff Hernandez believes that the settlement

21 reached herein is a fair, reasonable, and adequate result for the class members involved and should

22 be approved by the Court.

23 26. The rationale for a fee enhancement in contingency cases is to not only compensate

24 the attorney for legal services, but to provide fair compensation for the risk and delay of not being

25 paid at all. (*Ketchum v. Moses* (2001) 24 Cal.4th 1122, 1132-1133.) In counsel's experience, the risks

26 of prosecuting a class action case such as this are significant. Class Counsel has expended time in the

27 prosecution of this litigation on a contingency basis without any direct compensation and having

28 advanced litigation costs, carrying the risk that this time and the current out-of-pocket costs would be

lost if the case were not resolved successfully.

1 ATTORNEYS' COSTS

2 27. Plaintiff's Counsel has expended Four Thousand Two Hundred Fourteen Dollars and
3 Sixty-Seven Cents (\$4,214.67) in costs in this case. (McKee Dec., Exhibit 1). All costs were
4 reasonably incurred in prosecution of the lawsuit and paid on a contingency basis. A large portion of
5 these costs were associated with filing fees for this case, service of documents, mediation, expert
6 analysis, and telephonic court appearances; the remainder was reasonably incurred in prosecution of
7 the lawsuit. Therefore, Class Counsel seeks the costs in the amount of Four Thousand Two Hundred
8 Fourteen Dollars and Sixty-Seven Cents (\$4,214.67) as reimbursement of such costs is appropriate
9 and reasonable.

10 FEE SPLITTING

11 28. Plaintiffs have also agreed to a payment of the attorney's fees in this matter. Class
12 counsel will be splitting their attorneys' fees and the Parties (Plaintiffs and Plaintiffs' counsel) have
13 consented to the split in writing.

14 EXHIBITS

15 29. Attached as Exhibit 1 to this declaration is a true and correct copy of the Lavi &
16 Ebrahimiian Costs.

17 30. Attached as Exhibit 2 to this declaration is a true and correct copy of printouts from
18 the 2014 National Law Journal sampling of California firm billing rates.

19 31. Attached as Exhibit 3 to this declaration is a true and correct copy of the 2008 National
20 Law Journal sampling of billing rates.

21 32. Attached as Exhibit 4 to this declaration is a true and correct printout of the Laffey
22 Matrix available at <http://www.laffeymatrix.com/see.html>.

23 33. Attached as Exhibit 5 to this declaration is a true and correct copy of the 2020 Locality
24 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/)
25 [oversight/pay-leave/salaries-wages/2018/general-schedule/](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2018/general-schedule/).

26 34. Attached as Exhibit 6 to this declaration is a true and correct copy of the 2020 Locality
27 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/)
28 [oversight/pay-leave/salaries-wages/2018/general-schedule/](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2018/general-schedule/).

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

4 36. Attached as Exhibit 8 to this declaration is a true and correct copy of the Judiciary
5 Salary Plan Pay Table for Los Angeles-Long Beach, CA available at
6 <http://www.uscourts.gov/careers/compensation/judiciary-salary-plan-pay-rates>.

7 37. Attached as Exhibit 9 to this declaration is a true and correct copy of 2020 Locality
8 Pay Area Definitions defining counties within Los Angeles-Long Beach, CA area available at
9 [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/220/locality-pay-area-](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/220/locality-pay-area-definitions/)
10 [definitions/](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/220/locality-pay-area-definitions/).

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

13 Dated: December 8, 2023

14 

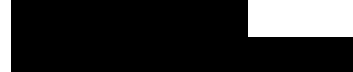
15 _____
16 Antonia McKee
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EXHIBIT 1

August 25, 2023

VIA PERSONAL DELIVERY

Christian C. Hernandez



RE: HERNANDEZ, C. v. PROCTER & GAMBLE DISTRIBUTING, LLC; ET AL.

Dear Mr. Hernandez:

Please find listed below a breakdown of the professional costs and fees associated with your case titled Christian Hernandez V. Procter & Gamble Distributing, LLC; et al.

COSTS AND FEES ADVANCED BY LAVI & EBRAHIMIAN, LLP

DATE	ITEM	COST
	SETTLEMENT AMOUNT	
N/A	Copying	\$70.00
N/A	Scanning	\$70.00
N/A	Fax	\$6.00
N/A	Mail	\$46.07
	RIVERSIDE SUPERIOR COURT	
04/02/2021	Summon and Complaint Fee (Class)	\$1,450.00
08/25/2021	Summon and Complaint Fee (PAGA)	\$1,450.00
03/18/2022	Document Retrieval (PAGA)	\$38.00
06/08/2022	Document Retrieval Fee (Class)	\$3.00
	DDS LEGAL SERVICES	
04/02/2021	Filing of Summon and Complaints (Class)	\$73.45
04/28/2021	Process Service of Summons and Complaints to Procter & Gamble Distributing, LLC (Class)	\$53.90
04/28/2021	Process Service of Summons and Complaints to Schenker, Inc. (Class)	\$37.00
04/30/2021	Filing Of POS of Summons Of 1) Schenker, Inc. And 2) Procter & Gamble Distributing, LLC (Class)	\$29.95

Christian Hernandez

Christian Hernandez v. Procter & Gamble Distributing, LLC; et al.

August 25, 2023

Page 2 of 4

06/04/2021	Filing of Joint Case Management Conference Statement in Advance Of June 21, 2021 CMC (Class)	\$29.95
07/12/2021	Filing of Plaintiff's Declaration Of Pooja V. Patel Re Material Filings In Federal Action Pursuant To Local Rule 3135 (Class)	\$9.95
07/28/2021	Filing of Summon and Complaints (PAGA)	\$9.95
08/25/2021	Fee Advancement of Summon and Complaints (PAGA)	\$43.50
12/17/2021	Filing of Amendment to Complaint (PAGA)	\$32.90
04/01/2022	Filing Of 1) Proof of Service 2. Plaintiff's Status Report in Advance Of Status Conference (PAGA)	\$33.75
04/01/2022	Courtesy Copy Delivery of 1) Proof of Service 2. Plaintiff's Status Report in Advance Of Status Conference (PAGA)	\$79.95
04/05/2022	Email Delivery Service of Minute Orders to Client (PAGA)	\$4.00
05/10/2022	Filing of 1) Plaintiff's Peremptory Challenge to Judge Pursuant To Code Of Civil Procedure § 170.6; Declaration Of Pooja V Patel 2. Proof Of Service (PAGA)	\$33.75
06/03/2022	Process Service of Summons and Complaint to Procter & Gamble Distributing, LLC (PAGA)	\$88.90
06/07/2022	Filing of POS of Summons to Procter & Gamble Distributing, LLC (PAGA)	\$33.75
06/07/2022	Courtesy Copies of POS of Summons to Procter & Gamble Distributing, LLC (PAGA)	\$ 79.95
06/16/2022	Filing Of 1) Plaintiff's Notice Of Ruling Re June 16, 2022 Status Conference 2) Proof Of Service (PAGA)	\$33.75
08/03/2022	Filing Of 1. Joint Status Report In Advance Of Status Conference 2. Proof Of Service (PAGA)	\$33.75
08/03/2022	Filing Of 1. Declaration Of Pooja V. Patel in Response To July 25, 2022, Order To Show Cause Re: Sanctions 2. Proof Of Service (PAGA)	\$33.75
10/17/2022	Filing Of 1. Joint Status Report In Advance Of Status Conference 2. Proof Of Service (PAGA)	\$33.75
12/27/2022	Filing of 1. Joint Status Report In Advance Of Status Conference (PAGA)	\$33.75
01/04/2023	Filing of Plaintiff Christian Hernandez's Notice of Further Status Conference (PAGA)	\$33.75
03/13/2023	Filing of Declaration of Phillip Song In Support to the Court's March 6, 2023 Minute Order RE Sanctions for Failure to File Joint Report (PAGA)	\$33.75
04/19/2023	Filing of Joint Status Report in Advance of Status Conference (PAGA)	\$33.75

Christian Hernandez

Christian Hernandez v. Procter & Gamble Distributing, LLC; et al.

August 25, 2023

Page 3 of 4

	DEPARTMENT OF INDUSTRIAL RELATIONS	
04/02/2021	PAGA Filing Fee	\$75.00
	CASEANYWHERE	
05/10/2023	System Access Fee (CLASS)	\$42.00
08/06/2023	System Access Fee (CLASS)	\$120.00
	Total Costs, fees and expenses	\$4,314.67
	Attorney's Fees (50%)	\$
	Total Fees and Costs	\$
	Net Settlement to Client	\$

Please note that by law I am required to give you the itemization of the above-referenced costs and fees incurred by my office on your behalf. Please review it carefully.

If you have any questions concerning the costs and fees, please do not hesitate to call me. If you agree with the itemization of costs and fees, please kindly initial the bottom right-hand side of every page of this letter and sign the last page on your signature box and send it to me.

It was a pleasure representing you in this matter. I wish you success in your future endeavors.

Very truly yours;

LAVI & EBRAHIMIAN, LLP

Joseph Lavi, Esq.

Christian Hernandez

Christian Hernandez v. Procter & Gamble Distributing, LLC; et al.

August 25, 2023

Page 4 of 4

I, Christian C. Hernandez, have read the above-stated costs and fees and consent and agree to their accuracy. I acknowledge that I have been given the opportunity to ask any questions concerning the fees and costs concerning my lawsuit. I, Christian C. Hernandez, agree to the disbursement of my settlement funds in connection with my lawsuit in the manner set forth above. I also understand and agree that Lavi & Ebrahimian, LLP is **NOT** responsible for any liens placed on my file of which Lavi & Ebrahimian, LLP is unaware and that it is NOT aware of any such liens.

I also acknowledge that Lavi & Ebrahimian, LLP has advised me that they are **NOT** tax advisers, nor are they qualified to give tax advice concerning what income tax I may owe as a result of this settlement. I acknowledge that Lavi & Ebrahimian, LLP has urged and recommended that I consult a qualified tax adviser regarding the income tax implications of this settlement. I further consent to my attorneys scanning all the documents pertaining to my case in lieu of storing the actual copies.

Dated: _____

Christian C. Hernandez

EXHIBIT 2

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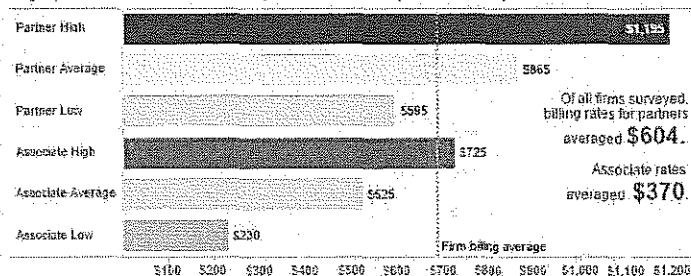
NLJ'S BILLING SURVEY

Select a Firm

- ☐ Miles & Stockbridge
- ☐ Miller & Martin
- ☐ Morgan Lewis
- ☐ Morris Manning
- ☒ Morrison & Foerster
- ☐ Nixon Peabody
- ☐ Norton Rose
- ☐ Butler McCann
- ☐ O'Brien & Gere
- ☐ 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

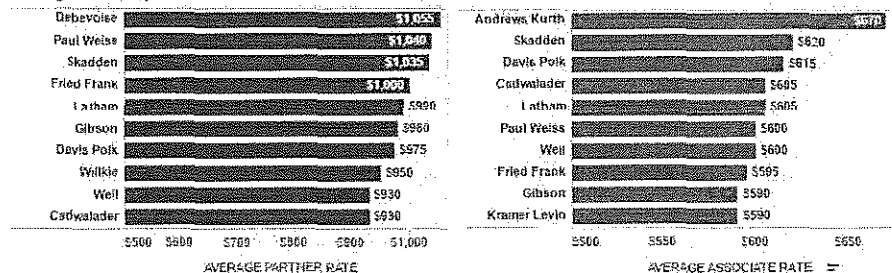


By the Numbers: The Firms Report Their Billing Rates

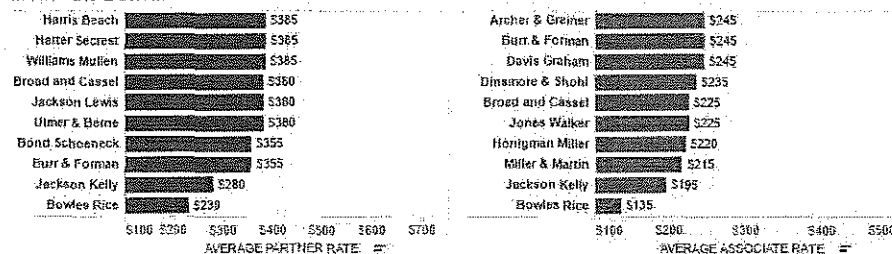
Firm	Largest U.S. Office	Total FTE Attorneys	Partner High	Partner Average	Partner Low	Associate High	Associate Average	Associate Low
Dechert	(New York)							
Andrews Kurth	Houston							
Hughes Hubbard	New York							
Irill & Manella	Los Angeles							
Proskauer Rose	New York							
White & Case	New 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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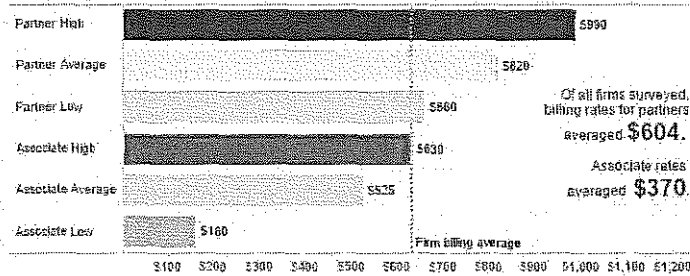
NLJ'S BILLING SURVEY

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

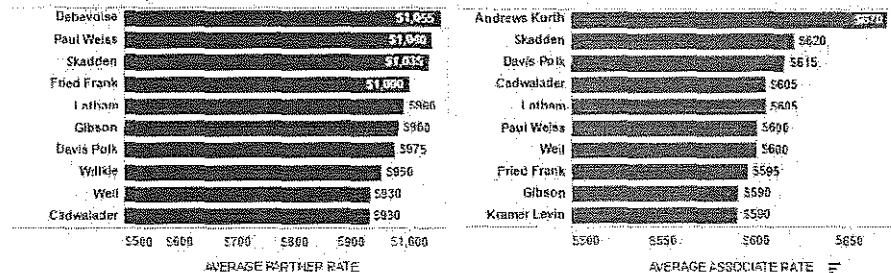


By the Numbers: The Firms Report Their Billing Rates

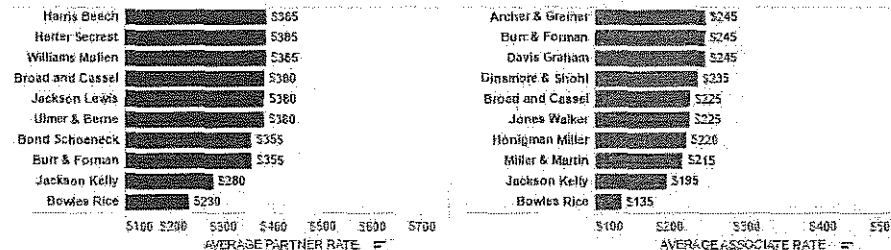
Firm	Largest U.S. Office	Total FTE Attorneys	Partner High	Partner Average	Partner Low	Associate High	Associate Average	Associate Low
Kaye, Kirchner	New York							
Kramer Levin	New York							
Hogan Lovells	Washington							
Katowitz Benson	New York							
Kirkland & Ellis	Chicago							
Cooley	Palo 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	Kenton							
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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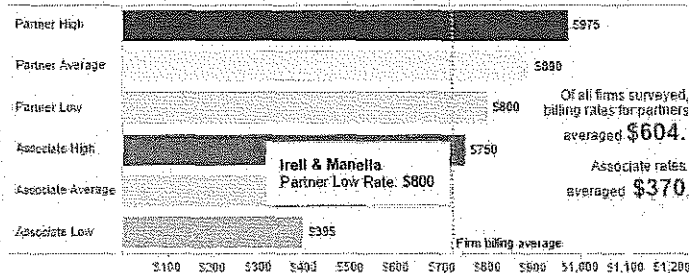
NLJ'S BILLING SURVEY

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
- ☐ Jones Walker
- ☐ Kaye Scholer
- ☐ Kramer Levin
- ☐ Latham
- ☐ McGuire Woods
- ☐ Morrison & Foerster
- ☐ Pillsbury Winthrop
- ☐ Proskauer Rose
- ☐ Skadden
- ☐ Stinson
- ☐ Sullivan
- ☐ Tuckers
- ☐ White & Case
- ☐ Wilkie
- ☐ Wolf
- ☐ Wood
- ☐ Work
- ☐ Wright
- ☐ Young
- ☐ Zuckerman

Irell & Manella

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

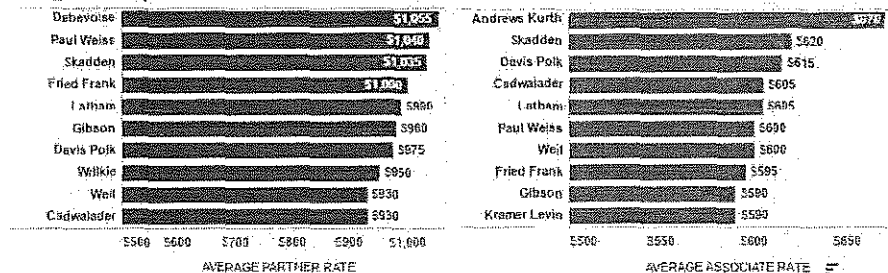


By the Numbers: The Firms Report Their Billing Rates

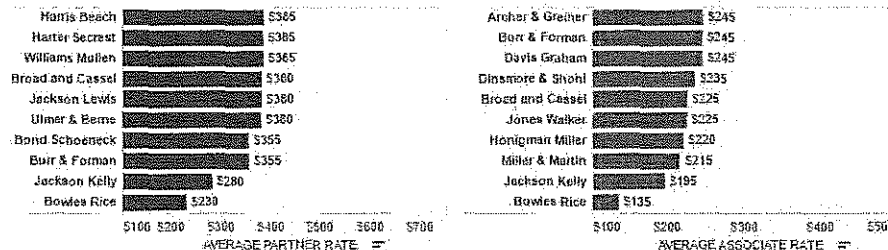
Firm	Largest U.S. Office	Total FTE Attorneys	Partner High	Partner Average	Partner Low	Associate High	Associate Average	Associate Low
Dechert	New York							
Andrews Kurth	Houston							
Hughes Hubbard	New York							
Irell & Manella	Los Angeles	164	\$975	\$800	\$750	\$750	\$604	\$395
Proskauer Rose	New 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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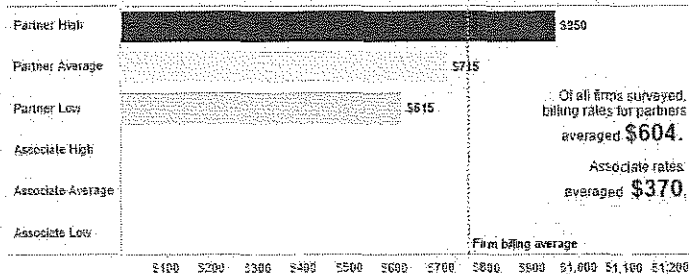
NLJ'S BILLING SURVEY

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

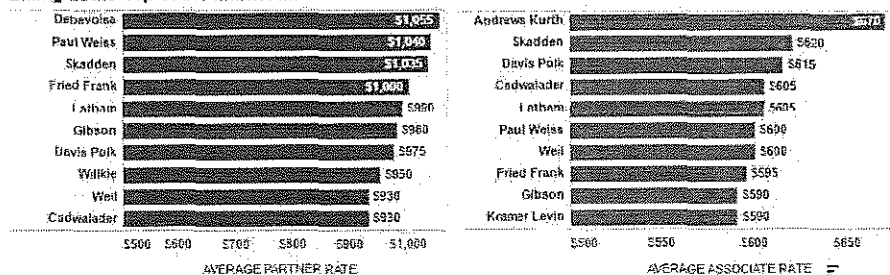


By the Numbers: The Firms Report Their Billing Rates

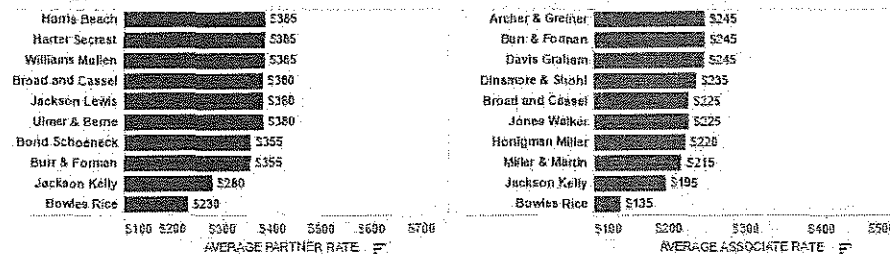
Firm	Largest U.S. Office	Total FTE Attorneys	Partner High	Partner Average	Partner Low	Associate High	Associate Average	Associate Low
Baker & McKenzie	Chicago							
Dickstein Shapiro	Washington							
Jenner & Block	Chicago							
Jones Day	New York							
Manatt Phelps	Los Angeles							
Seward & Kissel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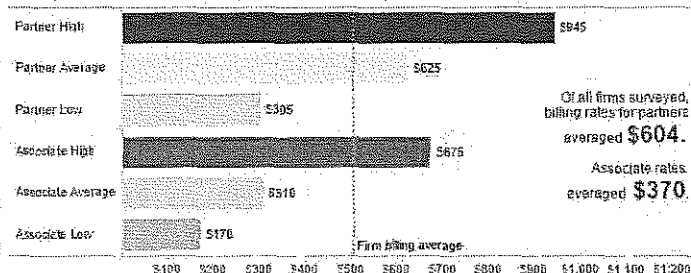
NLJ'S BILLING SURVEY

Select a Firm

- ☐ McKinsey Deutsch
- ☐ McGuireWoods
- ☐ McKenna Long
- ☐ Michael Best
- ☐ Miller & Stockbridge
- ☐ Miller & Martin
- ☐ Morgan Lewis
- ☐ Morris Manning
- ☐ Morrison & Foerster
- ☐ Nixon Peabody
- ☐ Norton Rose
- ☐ Nutter McInnes
- ☐ 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

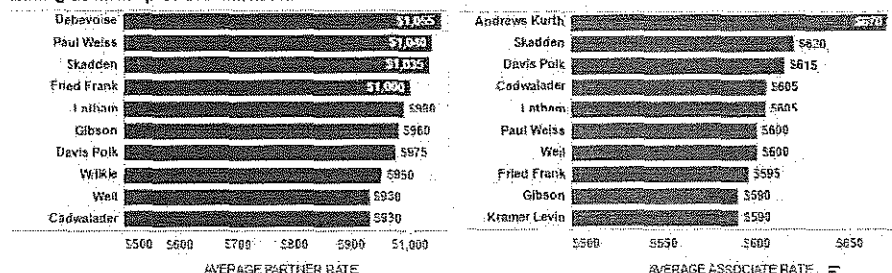


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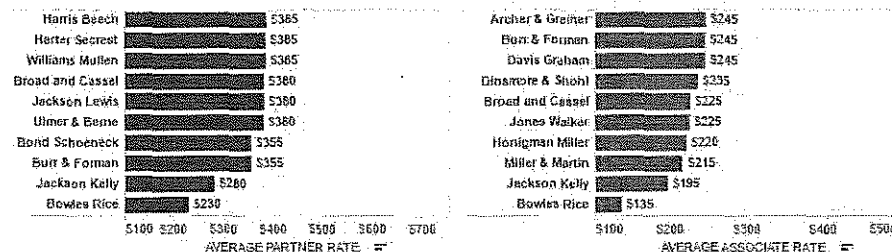
Firm	Largest U.S. Office	Total FTE Attorneys	Partner High	Partner Average	Partner Low	Associate High	Associate Average	Associate Low
Blank Rome	Philadelphia							
Kelley Drye	New York							
Gardere Wynne	Dallas							
Pepper Hamilton	Philadelphia							
Orrick, Herrington & Sutcliffe	San Francisco	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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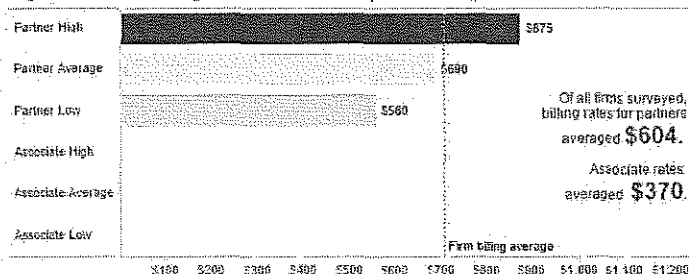
NLJ'S BILLING SURVEY

Select a Firm:

- ☐ Best & Martindale
- ☐ 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.

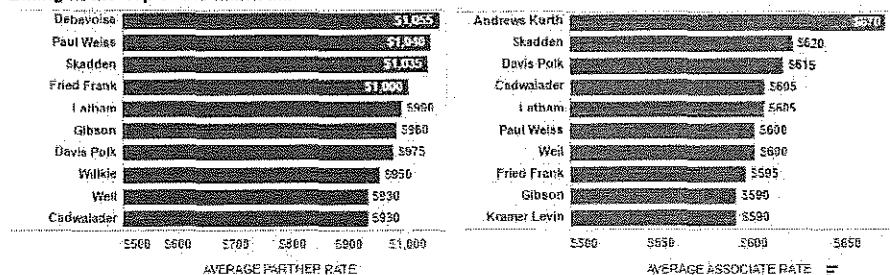


By the Numbers: The Firms Report Their Billing Rates

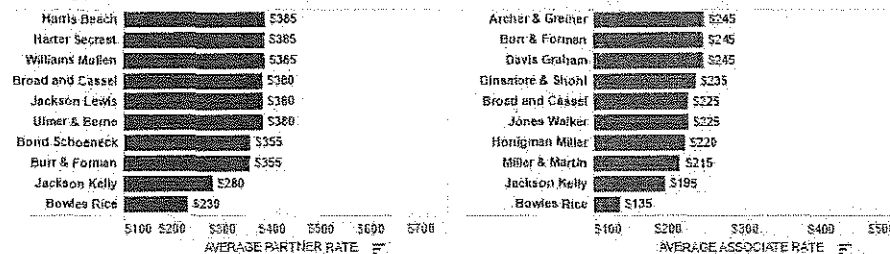
Firm	Largest U.S. Office	Total FTE Attorneys	Partner High	Partner Average	Partner Low	Associate High	Associate Average	Associate Low
Baker & McKenzie	Chicago							
Dickstein Shapiro	Washington							
Jenner & Block	Chicago							
Jones Day	New York							
Manatt Phelps	Los Angeles							
Seward & Kissel	New York							
O'Melveny & Myers	Los Angeles							
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							

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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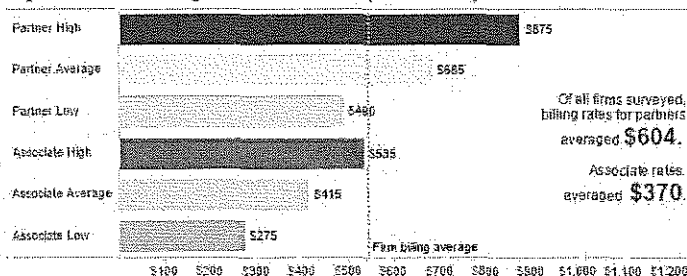
NLJ'S BILLING SURVEY

Select a Firm:

Robles & Cole
Rutan & Tucker
Saul Ewing
Seidman
Seward & Kissel
Seifarth 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

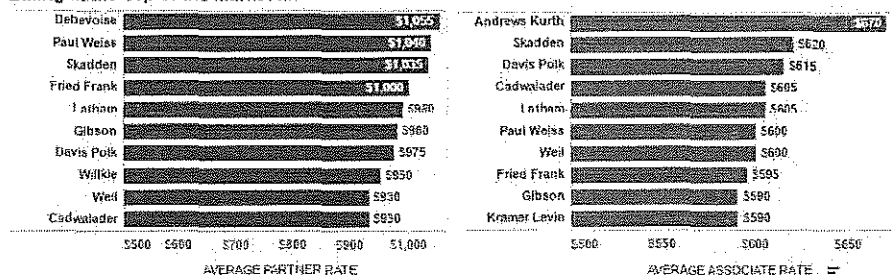


By the Numbers: The Firms Report Their Billing Rates

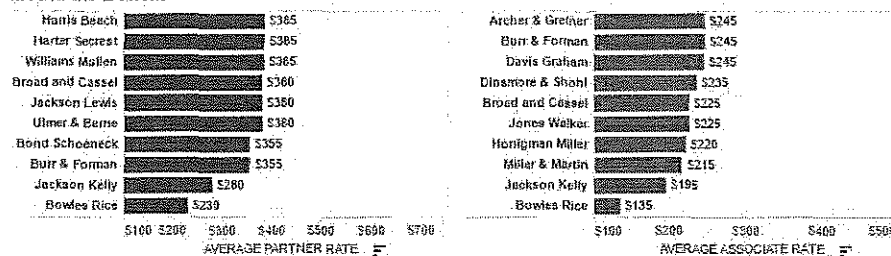
Firm	Largest U.S. Office	Total FTE Attorneys	Partner High	Partner Average	Partner Low	Associate High	Associate Average	Associate Low
Jeffrey Mangel	Los Angeles							
Sheppard Mullin	Los Angeles	521	\$875	\$685	\$480	\$535	\$415	\$275
Alston & Bird	Atlanta							
Foley Hoag	Boston							
Haynes and Boone	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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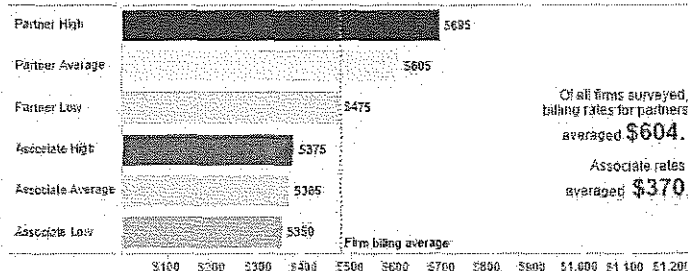
NLJ'S BILLING SURVEY

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

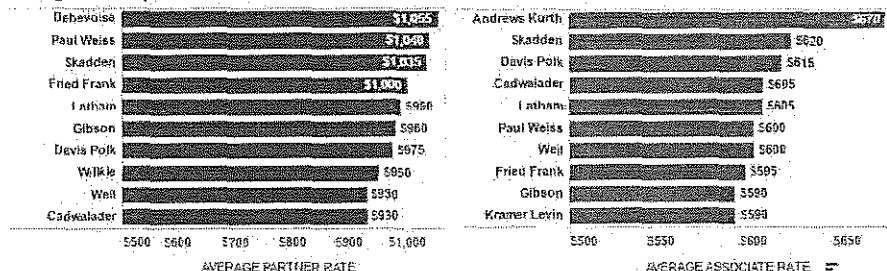


By the Numbers: The Firms Report Their Billing Rates

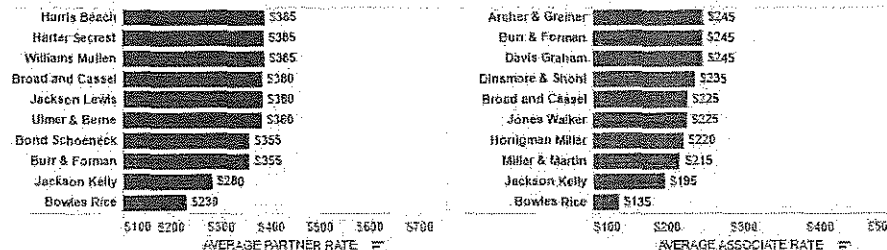
Firm	Largest U.S. Office	Total FTE Attorneys	Partner High	Partner Average	Partner Low	Associate High	Associate Average	Associate Low
Seyfarth Shaw	Chicago							
Buchalter Nemer	Los Angeles	134	\$695	\$605	\$475	\$375	\$365	\$350
Carlton Fields	Tampa, Fla.							
Foley & Lardner	Milwaukee							
Perkins 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							

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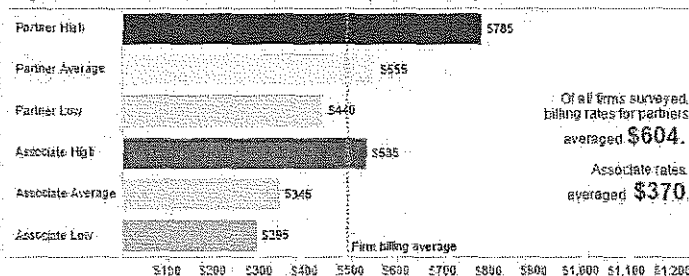
NLJ'S BILLING SURVEY

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

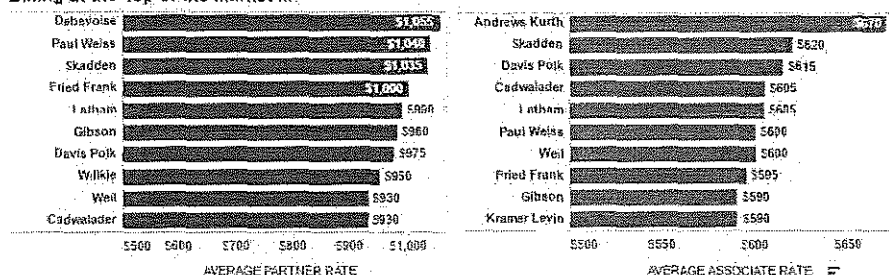


By the Numbers: The Firms Report Their Billing Rates

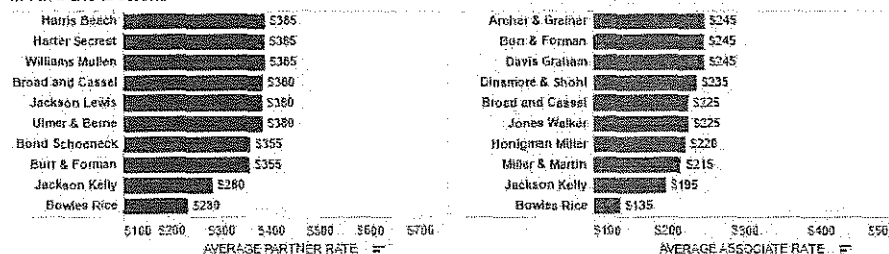
Firm	Largest U.S. Office	Total FTE Attorneys	Partner High	Partner Average	Partner Low	Associate High	Associate Average	Associate Low
Gibbons	Newark, N.J.							
Cozen O'Connor	Philadelphia							
Knobbe Martens	Irvine, Calif.	268	\$785	\$555	\$440	\$535	\$345	\$285
Kilpatrick Townsend	Atlanta							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

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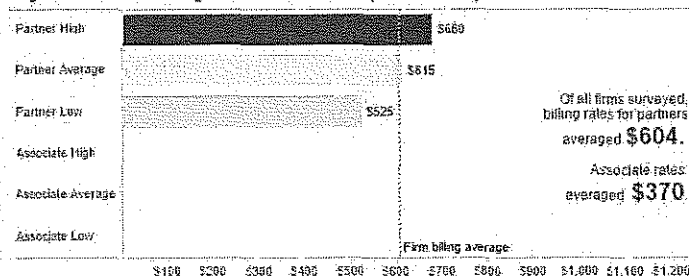
NLJ'S BILLING SURVEY

Select a Firm

- ☐ 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

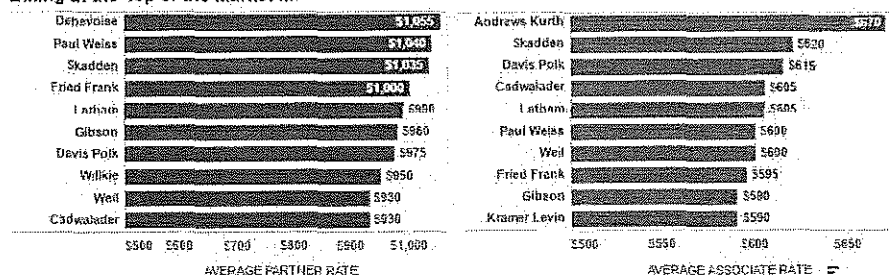


By the Numbers: The Firms Report Their Billing Rates

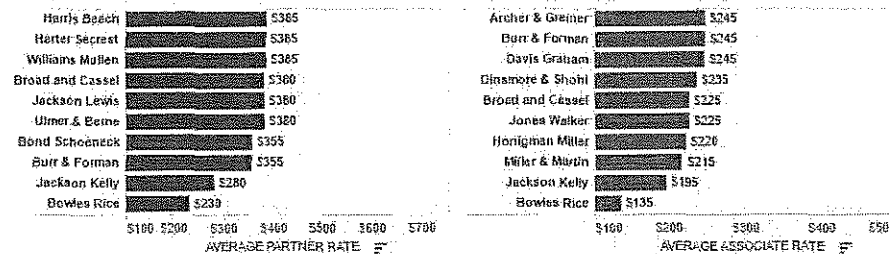
Firm	Largest U.S. Office	Total FTE Attorneys	Partner High	Partner Average	Partner Low	Associate High	Associate Average	Associate Low
Blank Rome	Philadelphia							
Kelley Drye	New York							
Gardere Wynne	Dallas							
Pappas Hamilton	Philadelphia							
Ornick Hemington	San Francisco							
Stevens & 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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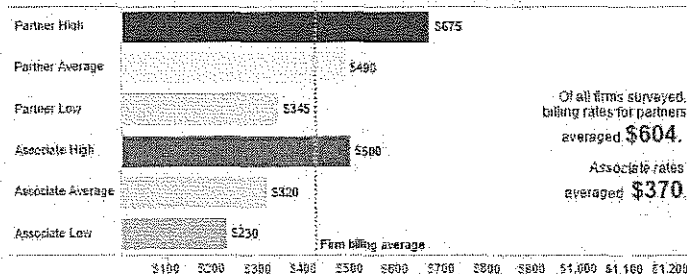
NLJ'S BILLING SURVEY

Select a Firm

☐ Pepper Hamilton
☐ Perkins Cole
☐ 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.

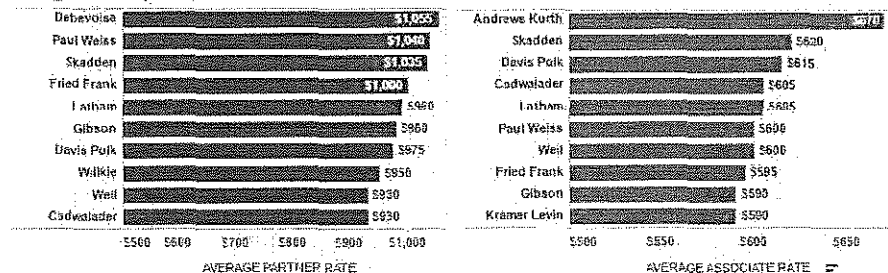


By the Numbers: The Firms Report Their Billing Rates

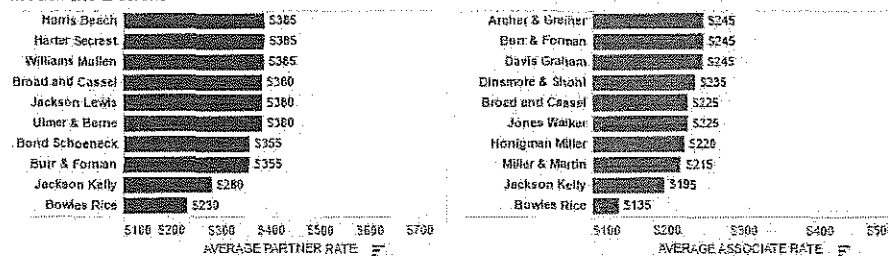
Firm	Largest U.S. Office	Total FTE Attorneys	Partner High	Partner Average	Partner Low	Associate High	Associate Average	Associate Low
Arnall Golden	Atlanta							
Rutan & Tucker	Costa Mesa, Calif.	139	\$675	\$490	\$345	\$580	\$320	\$230
Akerman Senterfitt	Blum							
Barnes & Thornburg	Indianapolis		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

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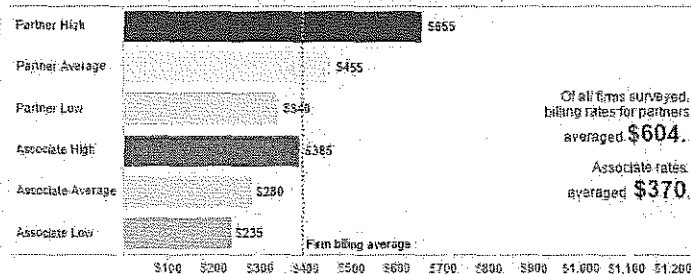
NLJ'S BILLING SURVEY

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

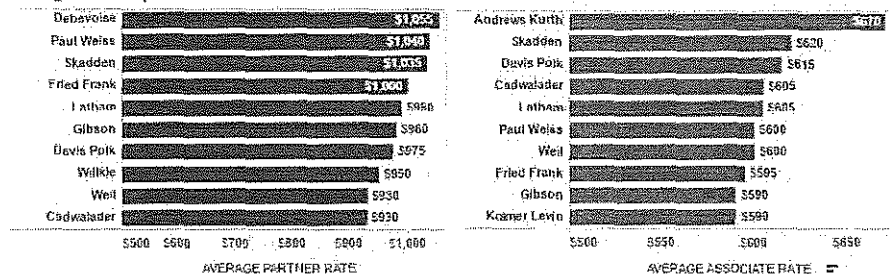


By the Numbers: The Firms Report Their Billing Rates

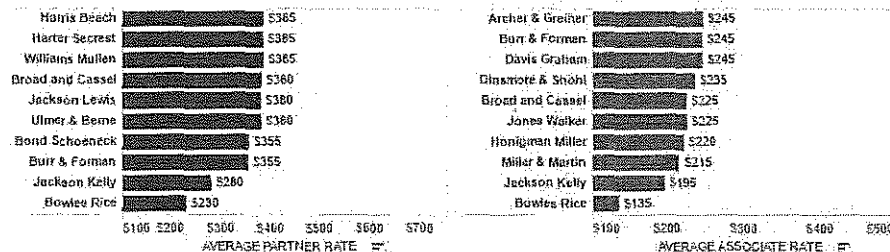
Firm	Largest U.S. Office	Total FTE Attorneys	Partner High	Partner Average	Partner Low	Associate High	Associate Average	Associate Low
Quarles & Brady	Memphis							
Arnstein & Lehr	Chicago							
Walton Lunsden	Nashville, Tenn.							
Benesch Friedlander	Cleveland							
Best Best	Riverside, Calif.	175	\$655	\$455	\$340	\$385	\$280	\$235
Faegre Baker	Minneapolis							
Riker Danzig	Hartford, Conn.							
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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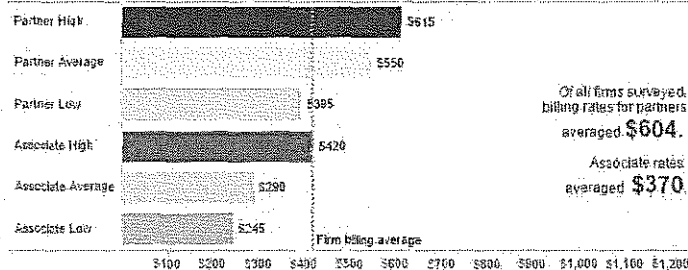
NLJ'S BILLING SURVEY

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

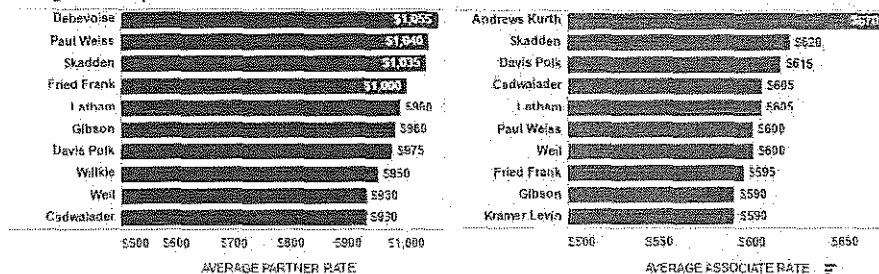


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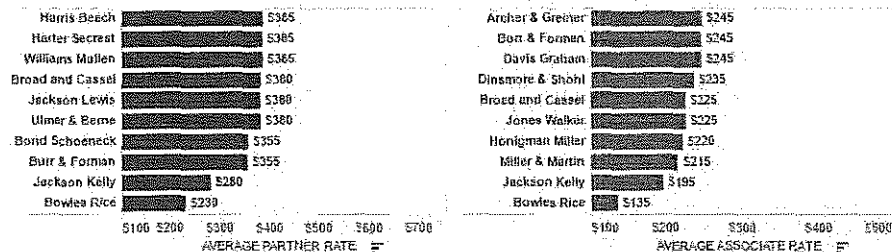
Firm	Largest U.S. Office	Total FTE Attorneys	Partner High	Partner Average	Partner Low	Associate High	Associate Average	Associate Low
Gilthons	Newark, N.J.							
Cozen O'Connor	Philadelphia							
Knobbe Martens	Irvine, Calif.							
Kilpatrick Townsend	Atlanta							
Littler Mendelson	San Francisco	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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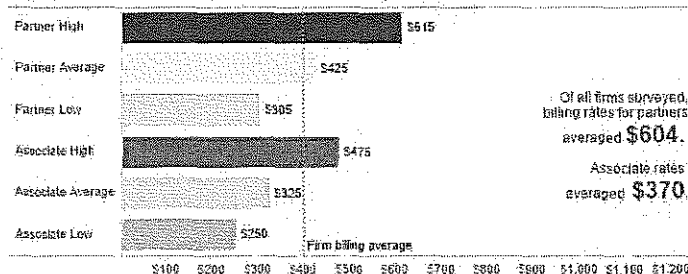
NLJ'S BILLING SURVEY

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

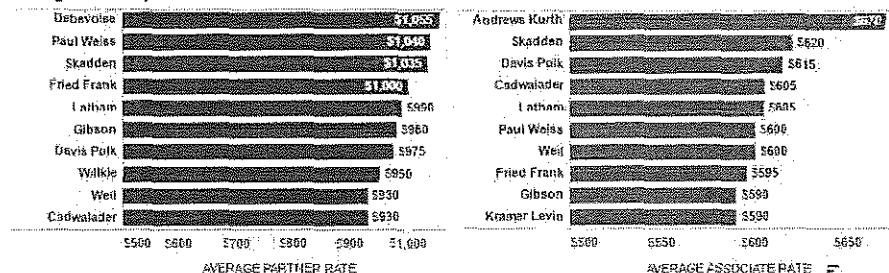


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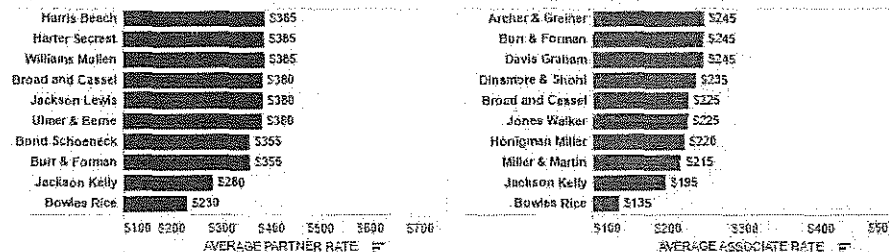
Firm	Largest U.S. Office	Total FTE Attorneys	Partner High	Partner Average	Partner Low	Associate High	Associate Average	Associate Low
Pepper Hamilton	Denver							
Bradley Arant	Birmingham, Ala.							
Husch Blackwell	St. Louis							
Lane Powell	Seattle							
Shutts & Bowen	Miami							
Connell Foley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

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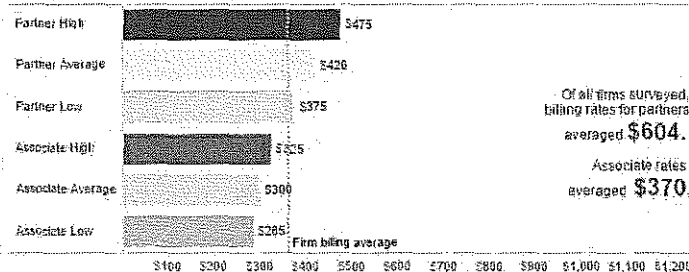
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Select a Firm

- ☐ 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, Fierman & Hand

Gordon & Rees

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

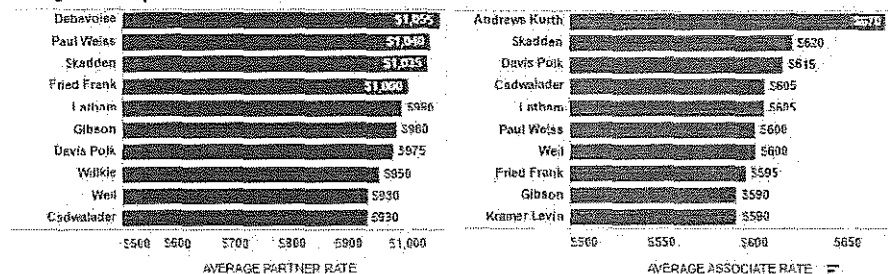


By the Numbers: The Firms Report Their Billing Rates

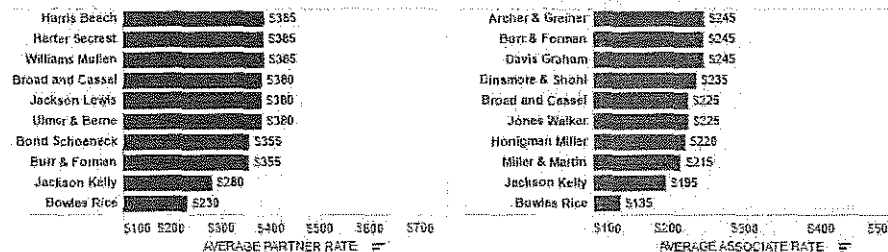
Firm	Largest U.S. Office	Total FTE Attorneys	Partner High	Partner Average	Partner Low	Associate High	Associate Average	Associate Low
Andrus & Bart	Denver							
Bradley Arant	Birmingham, Ala.							
Husch Blackwell	St. Louis							
Lane Powell	Seattle							
Shutts & Bowen	Miami							
Connell Foley	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							
Wygatt Tarrant	Lehigh, Pa.							
Taft Stettinius	Chicago							
Polinelli	Kansas City, Mo.							
Robinson & Cole	Hartford, Conn.							

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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... And the Bottom

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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.

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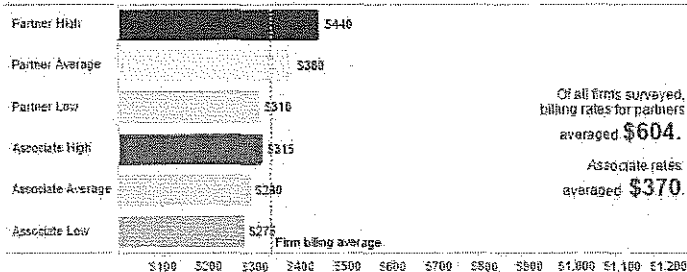
NLJ'S BILLING SURVEY

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[Hughes Hubbard](#)
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[Ice Miller](#)
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[Jackson Lewis](#)
[Jackson Walker](#)
[Jeffer Mangels](#)
[Jenner & Block](#)

Jackson Lewis

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

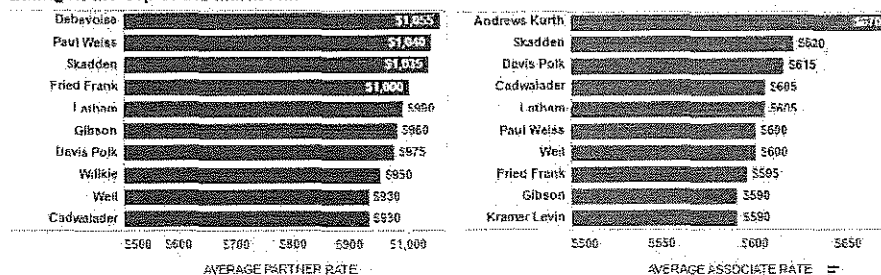


By the Numbers: The Firms Report Their Billing Rates

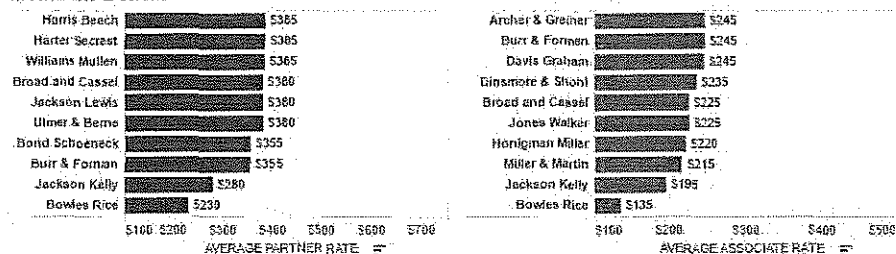
Firm	Largest U.S. Office	Total FTE Attorneys	Partner High	Partner Average	Partner Low	Associate High	Associate Average	Associate Low
Honigman Miller	Detroit							
Varnum	Grand Rapids, Mich.							
Harris Beach	Rochester, N.Y.							
Harter Secrest	Rochester, N.Y.							
Jones Walker	New Orleans							
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.

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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.

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EXHIBIT 3

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)

Stoel Rives (350), Portland, Ore.

Partners \$290-\$550

Associates \$170-\$365

Strasburger & Price (194), Dallas

Partners \$300-\$580

Associates \$185-\$395

Firmwide (average \$334)

Sullivan & Worcester (182), Boston

Partners \$450-\$775 (average \$603, median \$600)

Associates \$270-\$490 (average \$343, median \$330)

Firmwide (average \$485, median \$495)

Sutherland Asbill & Brennan (429), Atlanta

Partners \$395-\$750 (average \$543, median \$530)

Associates \$240-\$450 (average \$316, median \$300)

Firmwide (average \$379, median \$380)

Taft Stettinius & Hollister (337), Cincinnati

Partners \$200-\$475 (average \$354, median \$355)

Associates \$165-\$325 (average \$217, median \$195)

Firmwide (average \$294, median \$295)

Thompson Coburn (344), St. Louis

Partners \$295-\$555

Associates \$170-\$400

Thompson Hine (396), Cleveland

Partners \$275-\$740 (average \$425, median \$420)

Associates \$185-\$510 (average \$240, median \$235)

Firmwide (average \$330, median \$325)

Thompson & Knight (458), Dallas

Partners \$410-\$785 (average \$545, median \$530)

Associates \$250-\$500 (average \$334, median \$345)

Firmwide (average \$453, median \$450)

Ulmer & Berne (176), Cleveland

Partners \$230-\$495 (average \$319)

Associates \$175-\$310 (average \$205)

Firmwide (average \$262)

Vedder Price (265), Chicago

Partners \$310-\$685 (average \$455, median \$445)

Associates \$235-\$390 (average \$290, median \$290)

Firmwide (average \$385, median \$390)

Venable (569), Washington

Partners \$380-\$950 (average \$530, median \$525)

Associates \$250-\$425 (average \$329, median \$320)

Firmwide (average \$440, median \$440)

White & Case (2,205), New York

Partners \$550-\$1,260 (average \$747)

Associates \$160-\$920 (average \$456)

Firmwide (average \$513)

Wiggin and Dana (152), New Haven, Conn.

Partners \$360-\$600

Associates \$215-\$375

Williams Mullen (326), Richmond, Va.

Partners \$300-\$625 (average \$401, median \$380)

Associates \$170-\$355 (average \$260, median \$255)

Firmwide (average \$344, median \$350)

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 4

LAFFEY MATRIX

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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 5

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 6

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 7

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 8

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 9

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

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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