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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN DIEGO**

THERESA BENDORF, JAVIER MARIN, and
KRISTY PRATHER, on behalf of themselves
and others similarly situated, and on behalf of
other aggrieved employees pursuant to the
California Private Attorneys General Act;

Plaintiffs,

v.

SEA WORLD LLC, a Delaware limited liability
company doing business as SEAWORLD SAN
DIEGO or AQUATICA SAN DIEGO;
SEAWORLD PARKS & ENTERTAINMENT,
INC., a Delaware corporation; and DOES 1
through 25, inclusive,

Defendants.

Lead Case No. 37-2021-00034922-CU-OE-CTL

Other Included Actions:

Case No. 37-2021-00036521-CU-OE-CTL
Case No. 37-2021-00049040-CU-OE-CTL
Case No. 37-2021-00047859-CU-OE-CTL
Case No. 37-2022-00001083-CU-OE-CTL

CLASS AND REPRESENTATIVE ACTION

**DECLARATION OF CHRISTINA M.
LUCIO IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Date: September 13, 2024
Time: 1:30 P.M.
Department: C-69
Judge: Hon. Katherine A. Bacal

Complaint Filed: August 16, 2021
FAC Filed: October 26, 2023
Trial Date: Not Set

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Attorneys for Plaintiff JAVIER MARIN

1 I, Christina M. Lucio, declare as follows:

2 1. I am an attorney at law, duly licensed to practice before all Courts in the State of California, and
3 an attorney with the law firm of Farnaes & Lucio, APC, one of the attorneys of record for the Plaintiff
4 Kristy Prather and the putative class in the above entitled consolidated action. I have personal
5 knowledge of the facts set forth below and if called to testify I could and would do so competently.

6 **THE SETTLEMENT IS FAIR, REASONABLE AND ADEQUATE**

7 2. I believe that based upon my extensive experience as a class and representative action
8 employment and wage and hour litigator, I am qualified to evaluate the claims and viability of the
9 defenses. Based on the history of this case, the strength of the claims and defenses, and the
10 overwhelmingly positive response of the Class to the notice process, it continues to be my view that the
11 settlement is fair, reasonable, and adequate, and in the best interest of the Class.

12 3. As set forth in greater detail in the Motion for Preliminary Approval of Class Action and
13 PAGA Settlement and accompanying declarations, the Settlement Agreement was the product of arms-
14 length negotiations between highly able and experienced attorneys on both sides who possessed the
15 relevant data and extensive legal research which they had carefully analyzed. Class Counsel obtained
16 significant pertinent policies, documentation, sampling data and class data prior to the mediation which
17 allowed Class Counsel to perform a detailed analysis of the potential damages. The Parties then engaged
18 in a full day of arm's length negotiations aided by well-respected mediator, Jeff Krivis, Esq. Mr. Krivis
19 continued his efforts until the Parties ultimately reached the Settlement Agreement which they now
20 request the Court finally approve.

21 4. On June 11, 2024, the Court entered an Order preliminarily approving the Class and PAGA
22 Settlement and Setting the hearing on the motion for final approval.

23 5. As detailed in the concurrently filed declaration of the administrator, notice was sent to the
24 Class and it was overwhelmingly well-received. The fact that no Class Members objected to the Settlement
25 and only seven requested exclusion confirm the conclusion that the Settlement is fair, reasonable and
26 adequate and in the best interests of the Class Members. This is an excellent result.

6. Based upon all known facts and circumstances (as detailed more extensively in the Declarations submitted at preliminary approval and submitted on this Motion), I continue to endorse the Settlement Agreement as it is fair, reasonable and adequate, and in the best interests of the Class.

CLASS COUNSEL'S CLASS ACTION EXPERIENCE

7. In 2003, I graduated magna cum laude from the University of California, Riverside with a Bachelor of Arts Degree. Following graduation, I attended the University of Southern California, Gould School of Law (USC Law School). At various points during law school, I worked with the USC Post-Conviction Justice Project, the Western Center for Disability Rights and the Barrister's Domestic Violence Clinic. During the Summer of 2005, I was a law clerk for the Law Offices of Bruce Austin (Safeco Insurance). In 2007, while a full-time law student, I was also a Judicial Extern for the Honorable Sandra Ikuta, United States Court of Appeals, Ninth Circuit. Thereafter, in 2007, I graduated from the USC Law School. The same year, I was admitted to practice law in the State of California.

8. From 2007 until 2010, I was an associate with Troutman Sanders LLP in San Diego (formerly Ross, Dixon, & Bell). As an associate, I assisted with the litigation of general business and labor & employment matters on an individual and class-wide basis. I assisted with the representation of both employers and employees. I also assisted employers on issues related to compliance with employment laws.

9. From 2011 until 2012, I was an associate with Wilson Turner Kosmo LLP. As an associate, I assisted with the litigation of labor & employment matters on an individual and class-wide basis solely on the side of management. I also assisted employers on issues related to compliance with employment laws.

10. Since 2012, I have been an attorney working with Farnaes & Lucio, APC, a law firm based out of Encinitas, California. I have litigated a wide variety of matters on both the plaintiff and defense side. Much of my work has been dedicated to plaintiff related employment issues such as wage and hour (individual and class action), wrongful termination, discrimination, disability, retaliation, and sexual harassment claims. I have defended at least seven class actions and obtained excellent results for my clients.

1 11. Since 2015, I have also been Of Counsel to the law firm of James Hawkins APLC.

2 12. Since 2015, my work has largely been focused on individual employment litigation and complex
3 wage and hour class actions. In my practice as a class action plaintiffs' attorney, I have been involved in
4 litigating, mediating and settling numerous wage and hour class actions dealing with class sizes ranging
5 from several hundred to several thousand class members resulting in settlements ranging from six figures
6 to multimillion dollar settlements. I was also co-lead trial counsel in a federal court jury trial in a wage
7 and hour class action, which resulted in a \$8.5 million settlement. *Vigueras v. Red Robin Int'l*, No. SACV
8 17-1422 JVS (DFMx), 2020 U.S. Dist. LEXIS 262135 (C.D. Cal. Dec. 2, 2020).

9 13. I have successfully litigated dozens of class and PAGA actions through Farnaes & Lucio, APC
10 and with James Hawkins APLC, as one of the counsels of record. Each of the following cases
11 successfully resolved on a class-wide or PAGA basis. This is not an all-inclusive list. My
12 experience includes, without limitation:

- 13 ○ *Arteaga-Villagomez v. Insultech, LLC*, Orange County Superior Court Case No. 30-2012-
14 00617802-CU-OE-CXC;
- 15 ○ *Quevedo v. Mercial, Inc.*, Orange County Superior Court Case No. 30-2015-00776171-
16 CU-OE-CXC;
- 17 ○ *Placencia v. Amcor Packaging Distribution, Inc.*, Orange County Superior Court Case
18 No. 30-2013-00694012-CU-OE-CXC;
- 19 ○ *Trani v. Lisi Aerospace, et al.*, Los Angeles Superior Court Case No. BC495527;
- 20 ○ *Galvan v. Goodwin Co.*, Orange County Superior Court Case No. 30-2013-00637062-
21 CU-OE-CXC;
- 22 ○ *Reyes v. Bristol Fiberlite*, Orange County Superior Court Case No. 30-2013-00653425-
23 CU-OE-CXC;
- 24 ○ *Gutierrez v. HMT Tank*, USDC Central Dist. Case No. CV14-1967-CAS(MANx);
- 25 ○ *Vigueras v. Red Robin International, Inc.*, USDC Central Dist. Case No. SACV 17-1422
26 JVS (DFMx);
- 27 ○ *Smith v. Space Exploration Technologies Corp.*, Los Angeles Superior Court, Case No.

BC55429;

- *Williams v. Il Fornaio America Corp.*, Sacramento County Superior Court Case No., 34-2011-0009616;
- *Aguilar v. 7-Eleven, Inc.*, Orange County Superior Court Case No. 30-2009-002687141-CU-OE-CXC;
- *Madrigal v. Huntington Beach Market Broiler, Inc.*, Orange County Superior Court Case No. 30-2012-00611260;
- *Vang v. Jazz Semiconductor, Inc.*, Orange County Superior Court Case No. 30-2011-00460278;
- *Cano v. Financial Statement Services, Inc.*, Orange County Superior Court, Case No. 30-2013-00653349-CU-OE-CXC;
- *Mendez v. Liberty Glass Fabricators, Inc.*, Riverside County Superior Court Case No. RIC1800119;
- *Attia v. Neiman Marcus Group, Inc.*, United States District Court for the Central District of California Case No. 8:16-cv-001504-DOC-FFM;
- *Dougan v. Healthy Living at Home*, San Diego Superior Court, Case No. 37-2020-00018447-CU-OE-CTL;
- *Mauleon v. Hanken Cono Assad & Co.*, San Diego Superior Court, Case No. 37-2020-00015364-CU-OE-CTL;
- *Johnson v. U.S. Bank National Association*, United States District Court for the Southern District of California Case No. 19-CV-00286-JLS-LL;
- *McGrath v. Wyndham Resort Development*, United States District Court for the Southern District of California Case No. 15-CV-1631-JM (KSC);
- *Ainsworth v. Sea Coast Hospice Care, Inc., et al.*, San Diego County Superior Court Case No. 37-2020-00039584;
- *Payne v. Marriott Ownership Resorts, Inc.*, San Diego Superior Court Case No. 37-2018-0015175-CU-OE-CTL;

- *Ayala v. Veg-Land, et al.*, Orange County Superior Court Case No. 30-2014-00738775-CU-OE-CXC;
- *Puente v. Sully-Miller Contracting Co.*, Orange County Superior Court Case No. 30-2015-00792088-CU-OE-CXC;
- *Garcia v. Revolution Foods, Inc.*, Los Angeles Superior Court Case No. BC579142;
- *Attaway, et al. v. Alliance Residential, LLC*, Santa Clara County Superior Court Case No. 20CV365134;
- *Bowman v. Delta Dental of California*, Alameda County Superior Court Case No. RG21108230;
- *Hernandez v. Burrtec Waste & Recycling Services, LLC*, United States District Court for the Central District of California Case No. 5:21-CV-001490-JWH-SP;
- *Grant v. T-Mobile USA, Inc.*, United States District Court for the Central District of California Case No. 2:21-CV-02268;
- *Dawson v. Wonderful Pistachios and Almonds, LLC*, Kern County Superior Court Case No. BCV-17-100848;
- *Hamilton, et al. v. Michael Kors Stores (California), Inc.*, Los Angeles County Superior Court Case NO. 19STCV37061;
- *Ross v. Stater Bros.*, San Bernardino Superior Court Case No. CIVDS1902518;
- *Walker v. Barrett Business Services, Inc., et al.*, Los Angeles County Superior Court Case No. 20STCV39172;
- *Benitez, et al. v. Medtronic, Inc., et al.*, Orange County Superior Court Case No. 30-2019-01069185-CU-OE-CXC;
- *Montgomery v. Copart, Inc.*, Sacramento County Superior Court Case No. 34-2020-00280733-CU-OE-GDS;
- *Vizcarra-McNamee v. Nordstrom, Inc.*, Orange County Superior Court Case No. 30-2020-01141916-CU-OE-CXC;

- *Ayers v. Cherry Hill Programs, Inc.*, Fresno County Superior Court Case No. 20CECG00821;
- *Sleeper v. Boot Barn, Inc.*, Sacramento County Superior Court Case No. 34-2019-00272000-CU-OE-GDS;
- *Pulido-Dias v. Dirt Cheap, Inc.*, San Bernardino County Superior Court Case No. CIVDS1719694;
- *Villanueva v. Nordstrom, Inc.*, San Bernardino County Superior Court Case No. CIVDS1918706;
- *Bryson v. Madame Tussauds, et al.*, Los Angeles County Superior Court Case No. 19STCV33514
- *Hightower v. Levy Premium, et al.*, Santa Clara County Superior Court Case No. 19CV359262;
- *Marquez v. Maxim Crane Works, L.P., et al.*, Los Angeles County Superior Court Case No. 19STCV39548;
- *Rovira v. Silverado Senior Living Management, Inc.*, Orange County Superior Court Case No. 30-2020-01136565-CU-OE-CXC;
- *Hallum, et al. v. FCA US, LLC*, San Bernardino County Case No. CIVDS1936782;
- *Martinez v. Placer Title Co., et al.*, Kern County Case No. BCV-19-103486;
- *Torres v. Van Law Food Products, Inc.*, Orange County Case No. 37-2017-00946312-CU-OE-CXC;
- *Holmes v. Pet Food Express, LLC*, Alameda County Case No. 22CV014140;
- *Ventura v. Conduent Commercial Solutions, LLC*, Kern County Case No. BCV-22-102043;
- *Ramirez v. CSI Electrical Contractors, Inc.*, Fresno County Superior Court Case No. 18CECG04150;
- *Magana v. Eibach Springs, Inc.*, Riverside County Superior Court Case No. RIC1708917;
- *Knox v. Express Messenger Systems, Inc.*, San Bernardino County Superior Court Case No. CIVDS1932323;

- *Corona, et al. v. G&M Oil Company, Inc.*, Los Angeles County Superior Court Case No. BC640876
- *Aguilar v. Peach Home Services, Inc., et al.*, Riverside County Superior Court Case No. RIC1823057;
- *Wilson v. M.C. LLC*, Orange County Superior Court Case No. 30-2019-01103382-CU-OE-CXC;
- *Nunez v. Nevell Group, Inc.*, Orange County Superior Court Case No. 30-2015-00783269;

14. I am currently litigating at least forty other wage and hour class and PAGA actions in State and Federal courts in the state of California.

THE ATTORNEYS' FEES AND LITIGATION COSTS CLASS COUNSEL SEEK ARE REASONABLE, FAIR AND ADEQUATE

15. In accordance with the terms of the Settlement Agreement, Class Counsel seeks an award of attorneys' fees in the amount of \$1,166,666.67 in attorneys' fees (one-third of the Gross Settlement Amount) and up to \$35,000.00 reimbursement for actual and necessary costs. Defendant does not oppose these amounts. In this case, the Class Notice specifically notified Class Members that Class Counsel would be seeking up to \$1,166,666.67 in attorneys' fees. No Class Member objected to the settlement. This strong favorable response also supports the requested fees.

16. The attorney's fees and costs requests are respectfully believed to be reasonable. Class Counsel represented Plaintiffs in this matter and have borne the entire risk and cost of this litigation on a pure contingency basis. The legal issues raised in this case were complex and drew significantly upon the experience of Class Counsel. The proposed attorneys' fees accurately reflect the legal marketplace and are within the range of customarily approved fees by California courts.

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

1 the merits in light of Defendant's asserted defenses. Still, Class Counsel has negotiated a substantial
2 settlement on behalf of the Class for such claims. Defendant has vigorously challenged the claims pled
3 in the operative complaint, contested liability, the amount of claimed damages, the propriety of the
4 certification, and would have continued to do so through trial. Accordingly, Class Counsel believe the
5 Settlement to be fair, reasonable, and adequate and in the best interest of the Class Members. The
6 fairness and adequacy of the Settlement is confirmed by all known facts and circumstances, including
7 the risk of significant delay and uncertainty associated with litigation, the various defenses asserted by
8 Defendant, and numerous potential appellate issues.

9 18. Plaintiff and Class Counsel respectfully submit the fees and costs provision of the
10 Settlement is fair and reasonable both when cross-checked under the lodestar and common fund method.
11 The total billable hours that I and my firm have invested and will invest in prosecuting this action,
12 should the settlement be approved by this honorable Court, is substantial. Our fees and costs request is
13 fair and reasonable because we have expended substantial time and effort in achieving the proposed
14 Settlement.

15 19. I have personally devoted in excess of 225.5 hours in prosecuting the Action. Such hours
16 were reasonable and necessary. My hourly rate is currently \$775 per hour. I have been the lead day to
17 day attorney for our firm on this matter. The number of hours that I expended for work performed and
18 the corresponding attorney's fees of \$174,762.50 were reasonable and necessary in obtaining the class-
19 wide settlement that Plaintiffs now ask the Court to finally approve. The following is a summary of my
20 tasks and activities in prosecuting this matter: investigating and researching claims, reviewing publicly
21 available information; conferences and interviews with client, reviewing documents related to
22 employment, drafting complaints, drafting the LWDA letters, drafting and revising relevant stipulations,
23 conferences and correspondence with defense counsel and co-counsel, participating in the Rule 26
24 conference and revising report, conferences and interviews with witnesses, review federal court filings
25 and filings in related cases, conferences re strategy, preparing for and appearing at case management
26 conferences and status conferences; numerous conferences with clients, reviewing productions and data
27 sets; preparing for mediation; revising the mediation brief; attending mediation; conferences with
28 defense counsel regarding claims and defenses; negotiations of the settlement; compiling damages

1 models; drafting and revising ex parte applications and related documentation; reviewing settlement in
2 related case, drafting and revising motion to intervene and related documentation; reviewing settlement
3 documents and notices; preparing declarations and revising motion for preliminary approval; revising
4 documents in support of motion; reviewing court orders; compiling data for approval motions; preparing
5 declarations and revising motion for final approval and fees motion; reviewing weekly summaries;
6 correspondence with administrator; assisting with pleadings and motions in the approval process; and
7 day to day case management.

8 20. Malte L. L. Farnaes is the principal of Farnaes & Lucio, APC. Mr. Farnaes has devoted
9 105.7 hours in representing Plaintiffs and the Class in this case. All hours spent were reasonable and
10 necessary to this action and in obtaining the class-wide settlement that Plaintiffs now ask the Court to
11 finally approve. Mr. Farnaes is a 1997 graduate of the University of California, San Diego and a 2002
12 graduate of the University of San Diego School of Law. He has been a member of the State Bar of
13 California since 2002. Since 2016 he has also served as the Honorary Consul of Denmark in San Diego
14 and Imperial Counties. His practice has focused primarily of commercial litigation and class actions.
15 The following is a summary of his tasks and activities in the litigation of this matter: initial investigation
16 and research before filing complaints, conferences with plaintiffs, conferences and interviews with
17 witnesses, reviewing voluminous document productions and data productions for mediation, reviewing
18 and revising mediation brief, conferences re damages models and revising same, conferences with
19 defense counsel re data and production sets, attending mediation, conferences regarding strategy, review
20 and revise pleadings, ex parte applications, and motions, correspondence regarding status; conferences
21 regarding settlement and related actions, assisting with day to day case management of this action and
22 related cases. Mr. Farnaes's hourly rate is \$775 per hour. The number of hours he expended on the case,
23 and the resulting attorney's fees of \$81,917.50 are reasonable and necessary.

24 21. Mitchell Murray is an attorney who has dedicated in excess of 110.2 hours in prosecuting
25 this action and obtaining the settlement on behalf of Plaintiffs and the Class. Such hours are reasonable
26 and necessary. Mr. Murray is a 2007 graduate of the University of California, San Diego and 2012
27 graduate of California Western School of Law. He was admitted to the State Bar of California in 2012.
28 He is a member of the Consumers Attorneys of San Diego. He was selected as a "Rising Star" in 2019

1 by Super Lawyers Magazine. Mr. Murray's legal experience has focused primarily on all areas of
2 employment law. Since 2016, he has focused his practice in the area of wage and hour class action. The
3 hours invested by Mr. Murray in litigating this case and the related cases since 2021 are reasonable and
4 necessary. The following is a summary of Mr. Murray's tasks and activities in prosecuting this matter:
5 legal and factual research regarding claims and defenses; conferences re strategy; review and revise
6 pleadings and motions; attending case management conferences; reviewing and revising mediation brief;
7 conferences to prepare for mediation; participating in mediation; settlement negotiations; reviewing and
8 revising complaint for consolidation; conferences with counsel in the related actions; drafting and
9 revising settlement documents and notices; drafting and revising the motion for preliminary approval;
10 revising documents in support of motion; reviewing court orders; compiling data for approval motions;
11 preparing declarations and revising motion for final approval and fees motion; reviewing weekly
12 summaries; correspondence with administrator; and assisting with pleadings and motions in the approval
13 process. Mr. Murray's hourly rate is \$725.00 per hour. The number of hours expended by Mr. Murray
14 for work performed and the corresponding attorney's fees of \$79,895.00 are reasonable and necessary.

15 22. Our former associate attorneys (Tri Luu and Danielle Piskor) also invested approximately
16 45.1 hours in the litigation of this action and the related actions. Our associates' hourly rates are
17 \$450.00 per hour. Both Mr. Luu and Ms. Piskor were admitted to the bar in 2021. Such hours were
18 reasonable and necessary in obtaining the class-wide settlement that Plaintiffs now ask the Court to
19 finally approve. The following is a summary of our associates' tasks and activities in prosecuting this
20 matter: drafting CMC statements and status conference statements, correspondence and conferences
21 with co-counsel and defense counsel, correspondence with client, drafting informal discovery requests,
22 document review, drafting complaints, drafting ex parte applications, appearing at conferences and
23 hearings, interviews with witnesses and notes re same, legal research and memoranda, memoranda re
24 factual issues. The number of hours expended by our associates for work performed and the
corresponding attorney's fees of \$20,295.00 are reasonable and necessary.

25 23. Our paralegals (Michael Cipriano, Camille Bayliss and Brandon Sumrow) have dedicated
26 over 100 hours in assisting with the prosecution of this case. The following is a summary of our
27 paralegal's tasks and activities in prosecuting this matter: setting up pleadings, CMC statements, and
28

status conference statements, drafting discovery, correspondence and conferences with witnesses, correspondence and conferences with clients, interviews with witnesses and notes re same, memoranda re factual issues. Their hourly rate is \$200.00 per hour. The number of hours expended for work performed and the corresponding fees of \$20,000 are reasonable and necessary.

24. The lodestar for Farnaes & Lucio, APC is approximately \$376,870.00. I submit that the requested attorneys' fees are fair and reasonable, as are the hourly rates at which our attorneys bill. In addition, we expect to spend at least another 7 hours in connection with the final approval hearing and managing the settlement through conclusion.

Farnaes & Lucio, APC Lodestar Summary				
Timekeeper	Years	Hours	Rate	Total
Malte Farnaes	22	105.7	\$775	\$81,917.50
Christina Lucio	17	225.5	\$775	\$174,762.50
Mitchell Murray	12	110.2	\$725	\$79,895.00
Associate Attorneys	1-2	45.1	\$450	\$20,295.00
Paralegal Staff		100	\$200	\$20,000
TOTALS		586.5		\$376,870.00

25. We respectfully submit that our hourly rates are reasonable in light of the hourly rates charged in the marketplace for comparable skill, years of experience and services. A true and correct copy of the 2021 Wolters Kluwer Real Rate Report, attached as **Exhibit 1**, and the Laffey Matrix, attached as **Exhibit 2**. Courts have approved the award of full fee requests using these rates for me and Mr. Murray in support of the lodestar in the following matters:

- a. *Benson v. F21 Opco, LLC*, San Diego Superior Court Case No. 37-2021-00024619-CU-OE-CTL.
- b. *Robles, et al. v. Jetro Holdings, LLC, et al.*, San Diego Superior Court Case No. 37-2021-00015414-CU-OE-CTL.
- c. *Hallum v. FCA US, LLC*, San Bernardino Superior Court Case No. CIVDS1936782.
- d. *Santamaria v. Bright Horizons Children's Center, et al.*, San Bernardino Superior Court Case No. CIVSB2210140 (approved \$775 per hour for Lucio and \$675 for Murray).
- e. *Ventura v. Conduent Commercial Solutions, LLC*, Kern County Superior Court Case No. BCV-22-102043-TSC.
- f. *Wright v. Compucom Systems, Inc.*, Riverside Superior Court Case No. CVRI2205136.

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

11 27. In serving as Plaintiffs' counsel and Class Counsel in this matter, my firm will also seek
12 reimbursement for the out-of-pocket costs of \$907.77. This does not include the costs incurred by our
13 co-counsel. A summary of the costs incurred by our firm to date in this action is attached herewith as
14 **Exhibit 3**. Any sums not awarded will be available for distribution to the Class as part of the Net
15 Settlement Amount. I believe that all of these fees and costs are reasonable and necessarily incurred in
16 litigating this matter and in pursuit of the settlement.

17 I declare under penalty of perjury under the laws of the State of California and the United States
18 of America that the foregoing is true and correct.

19 Executed on this 21st day of August 2024 in Encinitas, California

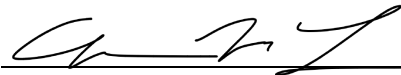
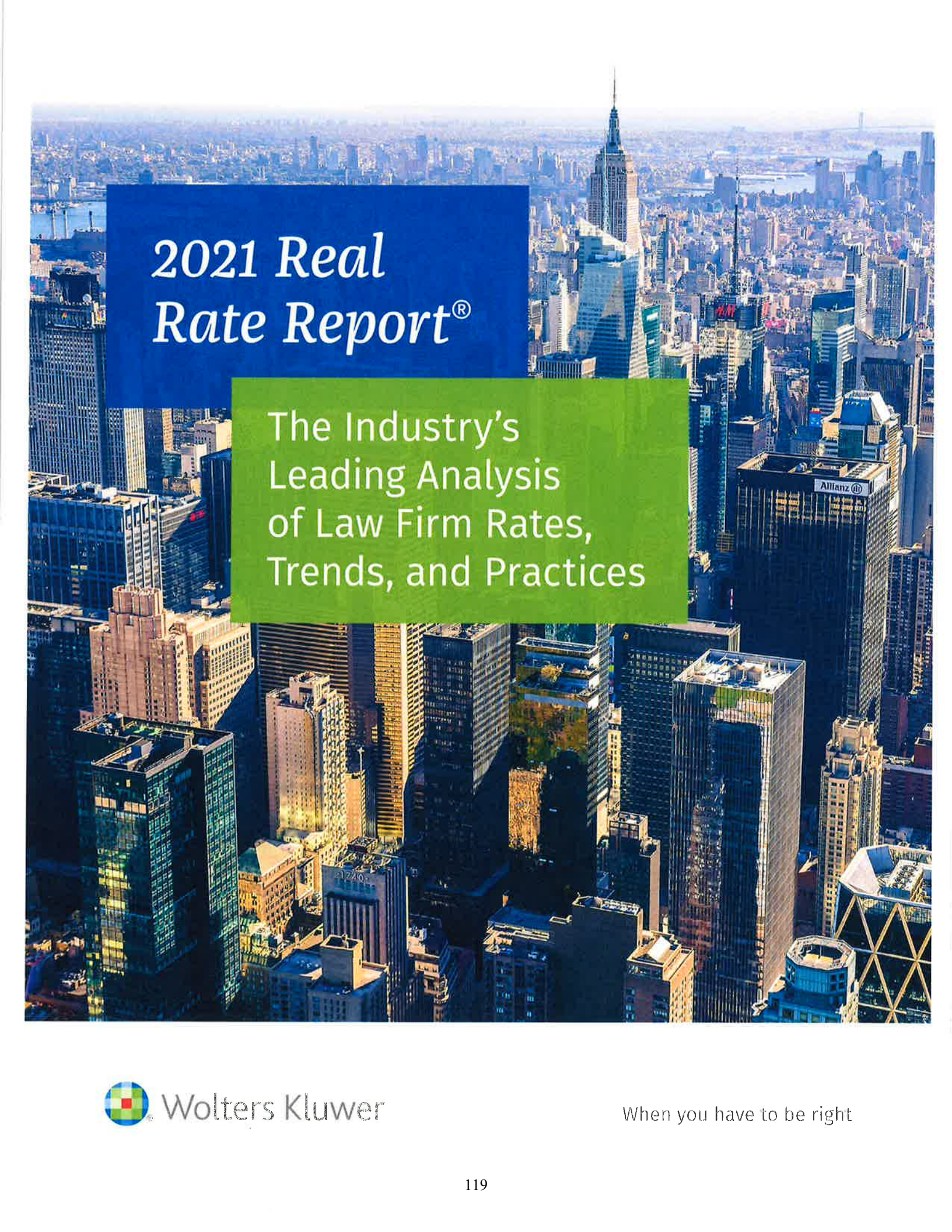
20
21
22 
23 Christina M. Lucio

EXHIBIT 1

An aerial photograph of the New York City skyline, featuring numerous skyscrapers and the Empire State Building prominently in the background. The image is used as a background for the report cover.

2021 Real Rate Report®

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Leading Analysis
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When you have to be right

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A Letter to Our Readers

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

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

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

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

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

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

Sincerely,



Barry Ader

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

Report Use Considerations

2021 Real Rate Report

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

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

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

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

Some key factors¹ that drive rates²:

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

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

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

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

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

Rates increase in geographic areas with growing population

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

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

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

Report Use Considerations

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

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

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

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

Section I: High-Level Data Cuts

Cities

By Matter Type

2021 - Real Rates for Associate and Partner

Trend Analysis - Mean

City	Matter Type	Role	n	First Quartile	Median	Third Quartile	2021	2020	2019
Kansas City MO	Non-Litigation	Associate	95	\$250	\$320	\$385	\$323	\$288	\$278
		Partner	14	\$285	\$350	\$484	\$402	\$445	\$413
Las Vegas NV	Non-Litigation	Partner	19	\$250	\$300	\$445	\$375	\$421	\$480
		Associate	12	\$238	\$323	\$377	\$320	\$282	\$280
Little Rock AR	Non-Litigation	Partner	12	\$215	\$215	\$300	\$267	\$290	\$274
Los Angeles CA	Litigation	Partner	342	\$475	\$715	\$1,042	\$759	\$708	\$694
		Associate	433	\$402	\$602	\$806	\$610	\$583	\$535
Los Angeles CA	Non-Litigation	Partner	559	\$600	\$880	\$1,160	\$894	\$872	\$816
		Associate	761	\$480	\$685	\$895	\$696	\$665	\$620
Louisville KY	Litigation	Partner	18	\$265	\$356	\$405	\$344	\$353	\$338
		Associate	16	\$178	\$200	\$278	\$225	\$227	\$214
Louisville KY	Non-Litigation	Associate	12	\$208	\$215	\$249	\$224	\$230	\$197
		Partner	15	\$244	\$389	\$529	\$421	\$424	\$430
Madison WI	Non-Litigation	Partner	15	\$244	\$389	\$529	\$421	\$424	\$430
Memphis TN	Litigation	Partner	16	\$290	\$415	\$425	\$364	\$355	\$347
		Associate	20	\$298	\$340	\$369	\$345	\$346	\$334
Miami FL	Litigation	Partner	100	\$282	\$475	\$614	\$465	\$473	\$453
		Associate	100	\$282	\$475	\$614	\$465	\$473	\$453

Section I: High-Level Data Cuts

Cities

By Years of Experience

2021 - Real Rates for Associate

Trend Analysis - Mean

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

Section I: High-Level Data Cuts

Cities

By Years of Experience

2021 - Real Rates for Partner

Trend Analysis - Mean

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

Section I: High-Level Data Cuts

Cities

By Role

2021 - Real Rates for Associate and Partner

Trend Analysis - Mean

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

EXHIBIT 2

LAFFEY MATRIX

[History](#)
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			Years Out of Law School *				
Year	Adjustmt Factor**	Paralegal/ Law Clerk	1-3	4-7	8-10	11-19	20 +
6/01/23- 5/31/24	1.059295	\$239	\$437	\$538	\$777	\$878	\$1057
6/01/22- 5/31/23	1.085091	\$225	\$413	\$508	\$733	\$829	\$997
6/01/21- 5/31/22	1.006053	\$208	\$381	\$468	\$676	\$764	\$919
6/01/20- 5/31/21	1.015894	\$206	\$378	\$465	\$672	\$759	\$914
6/01/19- 5/31/20	1.0049	\$203	\$372	\$458	\$661	\$747	\$899
6/01/18- 5/31/19	1.0350	\$202	\$371	\$455	\$658	\$742	\$894
6/01/17- 5/31/18	1.0463	\$196	\$359	\$440	\$636	\$717	\$864
6/01/16- 5/31/17	1.0369	\$187	\$343	\$421	\$608	\$685	\$826
6/01/15- 5/31/16	1.0089	\$180	\$331	\$406	\$586	\$661	\$796
6/01/14- 5/31/15	1.0235	\$179	\$328	\$402	\$581	\$655	\$789
6/01/13- 5/31/14	1.0244	\$175	\$320	\$393	\$567	\$640	\$771
6/01/12- 5/31/13	1.0258	\$170	\$312	\$383	\$554	\$625	\$753
6/01/11- 5/31/12	1.0352	\$166	\$305	\$374	\$540	\$609	\$734
6/01/10- 5/31/11	1.0337	\$161	\$294	\$361	\$522	\$589	\$709
6/01/09- 5/31/10	1.0220	\$155	\$285	\$349	\$505	\$569	\$686
6/01/08- 5/31/09	1.0399	\$152	\$279	\$342	\$494	\$557	\$671
6/01/07-5/31/08	1.0516	\$146	\$268	\$329	\$475	\$536	\$645
6/01/06-5/31/07	1.0256	\$139	\$255	\$313	\$452	\$509	\$614
6/1/05-5/31/06	1.0427	\$136	\$249	\$305	\$441	\$497	\$598
6/1/04-5/31/05	1.0455	\$130	\$239	\$293	\$423	\$476	\$574
6/1/03-6/1/04	1.0507	\$124	\$228	\$280	\$405	\$456	\$549
6/1/02-5/31/03	1.0727	\$118	\$217	\$267	\$385	\$434	\$522
6/1/01-5/31/02	1.0407	\$110	\$203	\$249	\$359	\$404	\$487
6/1/00-5/31/01	1.0529	\$106	\$195	\$239	\$345	\$388	\$468
6/1/99-5/31/00	1.0491	\$101	\$185	\$227	\$328	\$369	\$444
6/1/98-5/31/99	1.0439	\$96	\$176	\$216	\$312	\$352	\$424
6/1/97-5/31/98	1.0419	\$92	\$169	\$207	\$299	\$337	\$406
6/1/96-5/31/97	1.0396	\$88	\$162	\$198	\$287	\$323	\$389
6/1/95-5/31/96	1.032	\$85	\$155	\$191	\$276	\$311	\$375

6/1/94-5/31/95	1.0237	\$82	\$151	\$185	\$267	\$301	\$363
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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., *DL v. District of Columbia*, 267 F.Supp.3d 55, 69 (D.D.C. 2017)

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

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

EXHIBIT 3

Seaworld- Costs (Farnaes & Lucio APC)

Date	Description	Rate (\$)	
09/07/2021	Superior Court (Clu)	\$13.00	
09/07/2021	Superior Court (Clu)	\$10.20	
09/20/2021	DLSE PAGA	\$75.00	
12/02/2021	SD Superior Court ROA	\$4.00	
12/01/2021	SD Superior Court ROA	\$1.00	
12/02/2021	SD Superior Court ROA	\$63.40	
12/02/2021	SD Superior Court ROA	\$65.40	
12/02/2021	Memorandum of Points and Authorities,Motion - Other,Declaration - Other,Declaration - Other,Declarat STATUTORY	\$74.12	
12/07/2021	Ex Parte Application for Order Shortening Time,Declaration - Other,Proposed Order,Proof of Service	\$74.12	
12/08/2021	Ex-Parte Notice & Application, Declaration of Tri M. Luu ISO Ex Parte Application , Proposed Order, Proof of Service	\$97.03	
12/10/2021	Travel Expense Tri Luu	\$29.12	
09/14/2021	USPS First Class Mail Flat \$10.36 Track #: 70201810000206326729 USPS First Class Mail Flat \$10.36 USPS First Class Mail Flat \$10.36 USPS First Class Mail Flat \$10.36	\$41.44	
11/19/2021	Track #: 70211970000004327812 Track #: 70211970000004327805 Track #: 70201810000206326828 Track #: 70211970000004327829	\$48.24	
11/29/2021	USPS First Class Mail Flat \$11.02 Track #: 70211970000004327874 USPS First Class Mail Flat \$8.93 Track #: 70211970000004327881	\$19.95	
07/30/2024	Fedex (MLLF)	\$46.57	
07/31/2024	Postal Corner (MLLF)	\$245.18	
		\$907.77	