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Attorneys for Plaintiff ANNEKA WOLFE,
on behalf of herself and current and former aggrieved employees

[CONTINUED ON NEXT PAGE]

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF RIVERSIDE**

VERONICA REDONDO, on behalf of all
Aggrieved Employees and the State of
California; ANNEKA WOLFE, on behalf of
all Aggrieved Employees and the State of
California; DANIEL ENRIQUEZ, on behalf
of all Aggrieved Employees and the State of
California; LISA DAMMAN, on behalf of all
Aggrieved Employees and the State of
California; and SHERWIN MOKTARI, on
behalf of all Aggrieved Employees and the
State of California.

Plaintiff,

vs.

VERGE MOBILE CA EE, LP, a California
limited partnership; VERGE MOBILE CA
GP, LLC, a California limited liability
company; and DOES 1 through 20, inclusive;

Defendants.

Case No.: CVRI2200827

*[Assigned to Hon. Judge Harold Hopp, Dept
1, for all purposes]*

PAGA ACTION

**DECLARATION OF STEPHEN M.
SLOANE IN SUPPORT OF
PLAINTIFF'S MOTION FOR
APPROVAL OF PRIVATE
ATTORNEYS GENERAL ACT
SETTLEMENT**

Hearing Information:

Date: March 9, 2026

Time: 8:30 a.m.

Dept.: 1

1 Brian J. Mankin, Esq. [CSB No. 216228]

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2 Misty M. Lauby, Esq. [CSB No. 243009]

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5 Tel: (951) 320-1444 | Fax: (951) 320-1445

6 Attorneys for Veronica Redondo, on behalf of all Aggrieved Employees and the State of California

7 Jacob N. Whitehead, Esq. (SBN 266123)

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Irvine, CA 92618

10 Tel.: (949) 674-4922

11 Attorneys for Plaintiffs Daniel Enriquez, Lisa Damman and Sherwin Muktari and the Aggrieved
12 Employees

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1 has tried employment cases in state and federal courts, and has argued before various Courts of
2 Appeals, on employment issues such as validity of Arbitration Agreements, Application of Res
3 Judicata in class action cases, and other employment issues. Mr. Lavi has been a panelist and/or
4 speaker for various Employment Law Continuing Legal Education Panels on issues of employment
5 law trials, how to proceed and conduct trials, and proving and winning punitive damages. Mr. Lavi
6 has been named a Southern California Super Lawyer in the area of Plaintiff's employment litigation
7 for Class Actions from 2011-2025. Mr. Lavi has settled dozens of wage and hour class actions and is
8 currently Plaintiff's counsel in many others. Some of the class actions that Mr. Lavi has handled
9 against employers on wage and hour issues and have been approved as class counsel include cases
10 against the following: Kaiser Permanente which settled for \$6,510,000.00; Hustler Casino which
11 settled for \$980,000.00; Chevron Stations Inc., which settled for \$4,500,000.00; Commerce Casino
12 which settled for \$1,575,000.00; BP West Coast Products, which settled for \$4,000,000.00; Kaiser
13 Permanente which settled for \$3,600,000.00, Fuddruckers (as lead counsel) which settled for
14 \$900,000.00; Movado Retail Group, Inc. (as lead counsel) which settled for \$728,000.00, Chuck-E-
15 Cheese's (as lead counsel) which settled for \$1,900,000.00; Aero-Electric Connector, Inc. (as lead
16 counsel) which settled for \$1,500,000.00; Clougherty Packing, LLC (as lead counsel) which settled
17 for \$4,250,000.00; and Gruma Corporation (as lead counsel) which Defendants' petition to the United
18 States Supreme Court in the matter was denied and the matter settled for \$2,300,000.00. Mr. Lavi has
19 been approved as class counsel by both Federal and California Courts. Mr. Lavi and the other
20 attorneys at Lavi & Ebrahimian who are available to assist me in this case if needed are fully capable
21 of adequately and fairly representing Plaintiff and the proposed class in this matter.

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

- 24 a. *Ischak v. Kaiser Foundation Hospitals, Inc.*, Los Angeles Superior Court Case No.
25 BC343535;
26 b. *Santana v. El Pollo Loco, Inc.*, Los Angeles Superior Court Case No. BC369846;
27 c. *Edlin, et al. v. Fuddruckers, Inc.*, United States District Court, Central District of
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1 California, Case No. CV-07-3678-ABC;

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

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

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

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

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

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

13 j. *Solis v. Plycraft Industries, Inc.*, Los Angeles Superior Court Case No. BC374816;

14 k. *Campos v. HWB Carwash, Inc.*, Los Angeles Superior Court Case No. BC378990;

15 l. *Acosta, et al. v. Texwood Industries*, United States District Court, Central District of
16 California, Case No. CV07-3237-DDP (PLAX);

17 m. *Arevalo v. Gruma Corporation*, Los Angeles Superior Court Case No.
18 BC410322;

19 n. *Burrola v. American Promotional Events*, Los Angeles Superior Court Case No.
20 BC412315;

21 o. *Cortez v. Trader Distribution Services*, Los Angeles Superior Court Case No.
22 BC397208;

23 p. *Cueva v. Allied Industries, Inc.*, Los Angeles Superior Court Case No. BC399431;

24 q. *Del Toro v. Petco Animal Supplies, Inc.*, San Diego Superior Court Case No. 37-2009-
25 00103626-CU-OE-CTL;

26 r. *Garcia v. Home Cooking, Inc.*, Los Angeles Superior Court Case No. BC451148;

27 s. *Alcantar v. Amerimax Building Products, Inc.*, United States District Court, Central
28

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

2 ii. *Madrid v. OPI Products, Inc.*, Los Angeles Superior Court Case No. BC451489;

3 jj. *Martinez v. J. Fletcher Creamer & Son, Inc.*, United States District Court Case No.

4 CV 10-0968-PSG-FMOX;

5 kk. *Martinez v. Administaff Companies II, L.P.*, Los Angeles Superior Court Case No.

6 BC425799;

7 ll. *Martinez v. Morgans Hotel Group Management, LLC*, Los Angeles Superior Court

8 Case No. BC446744;

9 mm. *Sanchez v. La Brea Bakery, Inc.*, Los Angeles Superior Court Case No.

10 BC456420;

11 nn. *Montenegro v. Ruggeri Marble and Granite, Inc.*, United States District Court, Central

12 District of California, Case No. CV-10-00711 JFW (PLAx);

13 oo. *Reed v. 99 Cents Only Stores*, Los Angeles Superior Court Case No. BC436793;

14 pp. *Santos v. Noble Management Group-California, LLC*, United States District Court,

15 Central District of California, Case No. CV 10-2594 DSF (VBKx)

16 qq. *Taylor v. U.S. Healthworks Holding Company, Inc.*, Orange County Superior Court

17 Case No. 30-2011-00473505;

18 rr. *Valencia Diaz v. Gene Wheeler Farms, Inc.*, Los Angeles Superior Court Case No.

19 BC436235;

20 ss. *Zad-Behtooie v. Valley Village*, Los Angeles Superior Court Case No. BC451490;

21 tt. *Bell v. Aidells Sausage Company, Inc.*, Alameda Superior Court Case No.

22 RG10523946;

23 uu. *Negrete v. Cenveo, Inc.*, United States District Court, Central District of California,

24 Case No. CV 11-09543 DSF (MRWx);

25 vv. *Bejar v. Exopack-Ontario, Inc.*, Orange County Superior Court Case No. 30-2011-

26 00518396-CU-OE-CXC;

27 ww. *Aguilar v. PLS Financial Services, Inc.*, United States District Court, Central

District of California, Case No. CV 10-0415 ODW (FMOx);

xx. *Sparks v. Larry Flynt dba Hustler Casino*, Los Angeles Superior Court Case No. BC320172;

yy. *Morris v. Chevron Stations, Inc.*, Los Angeles Superior Court Case No. BC361380;

zz. *Marino v. BP West Coast Products, LLC*, Los Angeles Superior Court Case No. BC357987.

ATTORNEYS' FEES

8. Our firm has made every effort to litigate this action in an efficient and cost-effective manner. Following review of our case file and hours and discussions with counsel, our firm has spent approximately 158 hours on this matter for a total unadjusted lodestar of \$119,650.00.

9. In summary form, counsel's many tasks included the following: pre-filing investigation, legal research, and research of Defendant; meeting and communicating with client regarding her responsibility in bringing the action, the facts of her case, her employment, her work environment, and her documents and 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 Co-Counsel and Defendant's Counsel; analyzing data and information provided in informal discovery; calculating damages; negotiating settlement and settlement documents; communicating with the administrator and responding to administrator's inquiries; reviewing the motion for preliminary approval and preparing supporting documents; meeting with client regarding approval of the settlement; and drafting supporting documents for the motion for final approval. 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.

10. California Courts have applied the Laffey Matrix with adjustments to the specific California locality where the Counsel's office is located based on "Locality Pay Tables." (*Syers Properties III, Inc. v. Rankin* (2014) 226 Cal.App.4th 691, 695-696 [affirming fee award based on

1 Laffey Matrix with upward 9 percent rate adjustment from D.C. area compared to San Francisco Bay
2 Area based on Locality Pay Tables]; *In re HPL Techs., Inc., Secs. Litig.* (N.D. Cal. April 22, 2005,
3 No. C-02-3510 VRW) 365 F.Supp.2d 912, 921-922 [using Laffey Matrix with upward adjustment of
4 9 percent for San Francisco based on difference between D.C. Area ‘s +15.98 locality pay compared
5 to San Francisco’s +26.39 percent locality pay differential from the federal courts’ “Judiciary Salary
6 Plan Pay Tables.”].) Here, Lavi & Ebrahimian’s offices are located in Los Angeles County. For 2024,
7 the Locality Pay Tables (and Judiciary Salary Plan Pay Tables referred to in *In re HPL Techs., Inc.*),
8 state a 2.4 percent increase for the Los Angeles-Long Beach, CA area which includes the following
9 counties: Imperial County, Kern County, Los Angeles County, Orange County, Riverside County,
10 San Bernardino County, San Luis Obispo County, Santa Barbara County, and Ventura County. (Ex.
11 5,6 [2024 Locality Pay Tables for Washington-Baltimore-Arlington and Los Angeles-Long Beach,
12 CA available at [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2024/general-](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2024/general-schedule/)
13 [schedule/](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2024/general-schedule/)]; Ex. 3, 4 [Judiciary Salary Plan Pay Tables available at
14 <http://www.uscourts.gov/careers/compensation/judiciary-salary-plan-pay-rates>]; Ex. 7 [2023
15 Locality Pay Area Definitions defining counties within Los Angeles-Long Beach, CA area available
16 at [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2023/locality-pay-area-](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2023/locality-pay-area-definitions/)
17 [definitions/](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2023/locality-pay-area-definitions/)].) In applying the 2.4% locality increase for attorneys working in Imperial County, Kern
18 County, Los Angeles County, Orange County, Riverside County, San Bernardino County, San Luis
19 Obispo County, Santa Barbara County, and Ventura County over the Washington-Baltimore area
20 stated in the Laffey Matrix, the Laffey Matrix states the following relevant rates: \$447 for attorneys
21 1 to 3 years out of law school, \$551 for attorneys 4 to 7 years out of law school, \$795 for attorneys 8
22 to 10 years out of law school, \$899 for attorneys 11 to 19 years out of law school, and \$1,082 for
23 attorneys 20 plus years out of law school.

24 11. Working closely with the other attorneys in my firm, including on motions for
25 attorneys’ fees, I am aware of the experience and achievements of the counsel involved in this matter
26 as well as the rates which would be charged if our work were charged on an hourly basis. Having
27 reviewed numerous declarations in support of fee applications in Los Angeles, I also have knowledge
28

1 of hourly rates charged by other attorneys practicing in the field of employment law in Los Angeles.
2 Based on that information, I believe that my rate and the rates of the attorneys in my firm are fully
3 consistent with the market rate for attorneys with comparable expertise, experience and qualifications.
4 Based on the information I have, I believe that the rates of our firm are reasonable and appropriate
5 fees for Los Angeles attorneys with comparable expertise, experience, and qualifications.

6 12. Throughout the course of this litigation, Joseph Lavi estimates he has spent at least 34
7 hours litigating this matter. If Mr. Lavi were to charge a rate for this type of work by the hour, given
8 his experience and the focus of his practice, his current hourly rate would be \$1,000 per hour. A
9 \$1,000 rate is warranted based on Mr. Lavi's years of experience in a highly specialized area of law
10 and is in line with the Laffey Matrix. This rate is also in line with other partners out of law school and
11 practicing for over 15 years in California as indicated by the 2014 and 2008 National Law Journal
12 Survey. (See Ex. 2, 3.) Accordingly, Mr. Lavi's unadjusted lodestar in this matter is \$34,000.00 (34 x
13 \$1,000 = \$34,000.00).

14 13. Throughout the course of this litigation, Vincent C. Granberry estimates he has spent
15 at least 26 hours litigating this matter. If Mr. Granberry were to charge a rate for this type of work by
16 the hour, given his experience and the focus of his practice, his current hourly rate would be \$750.
17 Mr. Granberry is a graduate of the Sandra Day O'Connor College of Law at Arizona State University
18 and has been in practice since 2011. A \$750 rate is warranted based on Mr. Granberry's years of
19 experience in a highly specialized area of law and is in line with the Laffey Matrix. Accordingly, Mr.
20 Granberry's unadjusted lodestar in this matter is \$19,500.00 (26 x \$750 = \$19,500.00).

21 14. Throughout the course of this litigation, Jovahn M. Wiggins estimates he has spent at
22 least 38 hours litigating this matter. If Mr. Morales were to charge a rate for this type of work by the
23 hour, given his experience and the focus of his practice, his current hourly rate would be \$675. Mr.
24 Morales is a graduate of the Gonzaga University School of Law and has been in practice since 2023.
25 A \$675 rate is warranted based on Mr. Morales' years of experience in a highly specialized area of
26 law and is in line with the Laffey Matrix. Accordingly, Mr. Morales' unadjusted lodestar in this
27 matter is \$25,650.00 (38 x \$675 = \$25,650.00).

15. I have reviewed the files and billable records for Cassandra A. Castro, a former attorney of Lavi & Ebrahimian, LLP, in this matter. I am aware she graduated from Boston University School of Law and has been licensed to practice law since 2021. Ms. Castro spent approximately 32 hours litigating this matter. If Ms. Castro were to charge a rate for this type of work by the hour, given her experience, her current hourly rate would be \$675 per hour. A \$675 rate is warranted based on Ms. Castro's years of experience in a highly specialized area of law and is in line with the Laffey Matrix. Accordingly, Ms. Huether's unadjusted lodestar in this matter is \$21,600.00 (32 x \$675 = \$21,600.00).

16. Throughout the course of this litigation, I have spent approximately 28 hours on this matter. Given my experience and the focus of my practice, if I were to charge for my type of work by the hour my rate would be \$675 per hour. A \$675 rate is warranted based on my years of experience in a highly specialized area of law and is in line with the Laffey Matrix. Accordingly, my unadjusted lodestar for my hours spent on this case amounts to approximately \$18,900.00 (28 x \$675.00 = \$18,900.00).

17. Lavi & Ebrahimian LLP is co-counsel with Lauby, Mankin & Lauby LLP and W Employment Law, APC representing Plaintiffs in this Action and there is an agreement to split the attorneys' fees recovered in this Action. The named Plaintiffs have approved the aforementioned fee-splitting agreement in writing.

EXHIBITS

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

19. Attached as **EXHIBIT 2** to this declaration is a true and correct printout of the Laffey Matrix available at <http://www.laffeymatrix.com/see.html>.

20. Attached as **EXHIBIT 3** to this declaration is a true and correct copy of the 2024 Locality Pay Table for Washington-Baltimore-Arlington available at <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2024/general-schedule/>.

21. Attached as **EXHIBIT 4** to this declaration is a true and correct copy of the 2024 Locality Pay Table for Los Angeles-Long Beach, CA available at <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2024/general-schedule/>.

22. Attached as **EXHIBIT 5** to this declaration is a true and correct copy of the Judiciary Salary Plan Pay Table for Washington-Baltimore-Arlington available at <http://www.uscourts.gov/careers/compensation/judiciary-salary-plan-pay-rates>.

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

24. Attached as **EXHIBIT 7** to this declaration is a true and correct copy of 2023 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/2023/locality-pay-area-definitions/>.

ATTORNEYS' COSTS

25. Our firm maintains all records regarding costs expended on each case. I have reviewed the records of costs expended in this matter which total Eleven Thousand Seven Hundred Sixty-Nine Dollars and Seventy-Two Cents (\$11,769.72). All costs were reasonably incurred in prosecution of the lawsuit and paid on a contingency basis. A large portion of these costs were associated with filing fees for this case, service of documents, telephonic court appearances and mediation; the remainder was reasonably incurred in prosecution of the lawsuit.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 2nd day of December, 2025, in Beverly Hills, California.

/s/ Stephen Sloane
Stephen M. Sloane

EXHIBIT 1

COSTS AND FEES ADVANCED BY LAVI & EBRAHIMIAN, LLP

DATE	ITEM	COST
	SETTLEMENT AMOUNT	\$
N/A	Copying	\$12.75
N/A	Scanning	\$11.50
N/A	Mail	\$31.37
	LOS ANGELES SUPERIOR COURT	
12/07/2023	Filing of Summons and Complaint Filing Fee Complex Fee (CLASS)	\$ 1,435.00
02/13/2024	Filing of PAGA Complaint and Summons Complex Fee (PAGA)	\$ 435.00
03/28/2025	Document Retrieval (CLASS)	\$12.00
	DDS LEGAL SERVICES	
12/07/2023	Filing of Summons and Complaint (CLASS)	\$77.20
12/11/2023	Process Service of the Summons and Complaint (CLASS)	\$64.90
12/19/2023	Filing of Proof of Service of Summons & Complaint for Defendant VERGE MOBILE CA EE, LP (CLASS)	\$34.15
01/04/2024	Filing of Plaintiff's Notice of Court Order on Newly Filed Class Action and Notice of Initial Status Conference Order (CLASS)	\$34.15
02/13/2024	Filing of PAGA Complaint and Summons Complex Fee (PAGA)	\$47.20
02/23/2024	Filing of Joint Status Conference Class Action Response Statement (CLASS)	\$34.15
03/19/2024	Filing of PAGA Summons, Complaint, and ADR, etc. (PAGA)	\$124.90
04/02/2024	Filing of Plaintiff's Request for Dismissal of Class Allegations Pursuant (CLASS)	\$54.75
04/23/2024	Filing of Case Management Statement, File and Conform today (PAGA)	\$34.15
04/23/2024	Filing of Proof of Service for Verge Mobile CA EE, please file and conform (PAGA)	\$34.15
06/25/2024	Filing of Case Management Statement; Take CC to Dept. 32 (PAGA)	\$34.15
06/25/2024	Filing of Case Management Statement; Take CC to Dept. 32 (PAGA)	\$74.95
07/15/2024	Filing of Plaintiff Wolfe's Notice of Minute Order Re: Case Management Conference and Order (PAGA)	\$34.15
09/26/2024	Filing of Stipulation to stay PAGA Representative Action and Submit Individual PAGA Claims, Binding Arbitration (PAGA)	\$54.75
09/26/2024	Filing of Stipulation to stay PAGA Representative Action and Submit Individual PAGA Claims, Binding Arbitration – Send Courtesy Copy to Dep 32 (PAGA)	\$74.95
09/26/2024	Filing of Stipulation to stay PAGA Representative Action and Submit Individual PAGA Claims, Binding Arbitration – Proposed	\$54.75

	Order in Need of Review (PAGA)	
12/01/2025	Filing of Joint Statement re Post-Arbitration Status Conference (PAGA)	\$35.70
	LWDA – DEPARTMENT OF INDUSTRIAL RELATIONS	
12/07/2023	PAGA Fee	\$75.00
	MEDIATION OFFICES OF KEVIN T. BARNES	
02/26/2025	Mediation Fee (CLASS)	\$3,750.00
	BERGER CONSULTING GROUP	
03/12/2025	Economic Data Analysis Fees (PAGA)	\$3,780.00
	CASEANYWHERE / CLOUDBASE FEES	
2023 - 2025	Fees of Various Invoices & Cloud Base Fees (CLASS & PAGA)	\$1,324.00
	Total Costs, fees and expenses	\$11,769.72

EXHIBIT 2

LAFFEY MATRIX

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

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

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

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

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

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

EXHIBIT 3

Salary Table 2024-DCB
Incorporating the 4.7% General Schedule Increase and a Locality Payment of 33.26%
For the Locality Pay Area of Washington-Baltimore-Arlington, DC-MD-VA-WV-PA
Total Increase: 5.31%
Effective January 2024

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	\$ 29,299	\$ 30,282	\$ 31,255	\$ 32,226	\$ 33,198	\$ 33,767	\$ 34,732	\$ 35,703	\$ 35,742	\$ 36,649
2	32,945	33,728	34,820	35,742	36,145	37,209	38,272	39,336	40,399	41,463
3	35,947	37,145	38,343	39,541	40,739	41,937	43,135	44,333	45,531	46,729
4	40,351	41,696	43,040	44,385	45,730	47,074	48,419	49,763	51,108	52,452
5	45,146	46,650	48,155	49,659	51,164	52,668	54,173	55,677	57,182	58,686
6	50,326	52,003	53,681	55,359	57,037	58,714	60,392	62,070	63,748	65,425
7	55,924	57,788	59,653	61,517	63,381	65,245	67,110	68,974	70,838	72,703
8	61,933	63,997	66,061	68,125	70,189	72,254	74,318	76,382	78,446	80,510
9	68,405	70,685	72,965	75,245	77,525	79,805	82,085	84,366	86,646	88,926
10	75,329	77,840	80,350	82,861	85,372	87,882	90,393	92,904	95,414	97,925
11	82,764	85,522	88,281	91,039	93,798	96,556	99,315	102,073	104,832	107,590
12	99,200	102,506	105,812	109,119	112,425	115,731	119,037	122,343	125,650	128,956
13	117,962	121,894	125,827	129,759	133,692	137,624	141,557	145,489	149,422	153,354
14	139,395	144,042	148,689	153,336	157,982	162,629	167,276	171,923	176,570	181,216
15	163,964	169,429	174,894	180,359	185,824	191,289	191,900 *	191,900 *	191,900 *	191,900 *

* 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 2024 Locality Pay Area Definitions page:

<https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2024/locality-pay-area-definitions/>

EXHIBIT 4

Salary Table 2024-LA
Incorporating the 4.7% General Schedule Increase and a Locality Payment of 35.84%
For the Locality Pay Area of Los Angeles-Long Beach, CA
Total Increase: 5.44%
Effective January 2024

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	\$ 29,866	\$ 30,868	\$ 31,860	\$ 32,850	\$ 33,840	\$ 34,420	\$ 35,404	\$ 36,394	\$ 36,434	\$ 37,359
2	33,582	34,381	35,494	36,434	36,845	37,929	39,013	40,097	41,181	42,265
3	36,643	37,864	39,085	40,306	41,528	42,749	43,970	45,191	46,412	47,634
4	41,132	42,503	43,874	45,244	46,615	47,985	49,356	50,727	52,097	53,468
5	46,020	47,554	49,087	50,621	52,154	53,688	55,222	56,755	58,289	59,823
6	51,300	53,010	54,720	56,431	58,141	59,851	61,561	63,272	64,982	66,692
7	57,007	58,907	60,807	62,708	64,608	66,509	68,409	70,309	72,210	74,110
8	63,132	65,236	67,340	69,444	71,548	73,652	75,757	77,861	79,965	82,069
9	69,729	72,054	74,378	76,702	79,026	81,351	83,675	85,999	88,323	90,647
10	76,788	79,347	81,906	84,465	87,025	89,584	92,143	94,702	97,261	99,821
11	84,366	87,178	89,990	92,802	95,614	98,426	101,237	104,049	106,861	109,673
12	101,121	104,491	107,861	111,231	114,601	117,972	121,342	124,712	128,082	131,452
13	120,246	124,254	128,263	132,271	136,280	140,289	144,297	148,306	152,315	156,323
14	142,094	146,831	151,568	156,304	161,041	165,778	170,515	175,251	179,988	184,725
15	167,139	172,710	178,280	183,851	189,422	191,900 *	191,900 *	191,900 *	191,900 *	191,900 *

* 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 2024 Locality Pay Area Definitions page:

<https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2024/locality-pay-area-definitions/>

EXHIBIT 5

JUDICIARY SALARY PLAN
Washington-Baltimore-Arlington, DC-MD-VA-WV-PA - Table DCB
33.94% Locality Payment Included
Effective January 13, 2025

Grade	1	2	3	4	5	6	7	8	9	10
1	\$29,949	\$30,954	\$31,949	\$32,941	\$33,935	\$34,516	\$35,502	\$36,495	\$36,535	\$37,463
2	\$33,675	\$34,476	\$35,592	\$36,535	\$36,945	\$38,031	\$39,117	\$40,203	\$41,290	\$42,376
3	\$36,745	\$37,969	\$39,194	\$40,418	\$41,642	\$42,866	\$44,090	\$45,315	\$46,539	\$47,763
4	\$41,247	\$42,622	\$43,998	\$45,374	\$46,749	\$48,125	\$49,500	\$50,876	\$52,251	\$53,627
5	\$46,148	\$47,685	\$49,223	\$50,761	\$52,298	\$53,836	\$55,373	\$56,911	\$58,449	\$59,986
6	\$51,442	\$53,157	\$54,871	\$56,586	\$58,300	\$60,014	\$61,729	\$63,443	\$65,158	\$66,872
7	\$57,164	\$59,070	\$60,976	\$62,882	\$64,788	\$66,694	\$68,600	\$70,506	\$72,412	\$74,318
8	\$63,307	\$65,418	\$67,529	\$69,639	\$71,750	\$73,861	\$75,972	\$78,083	\$80,194	\$82,305
9	\$69,923	\$72,254	\$74,584	\$76,915	\$79,246	\$81,576	\$83,907	\$86,237	\$88,568	\$90,898
10	\$77,001	\$79,567	\$82,133	\$84,700	\$87,266	\$89,832	\$92,399	\$94,965	\$97,531	\$100,097
11	\$84,601	\$87,420	\$90,239	\$93,059	\$95,878	\$98,698	\$101,517	\$104,337	\$107,156	\$109,975
12	\$101,401	\$104,781	\$108,162	\$111,543	\$114,923	\$118,304	\$121,684	\$125,065	\$128,446	\$131,826
13	\$120,579	\$124,599	\$128,619	\$132,638	\$136,658	\$140,677	\$144,697	\$148,716	\$152,736	\$156,755
14	\$142,488	\$147,238	\$151,987	\$156,737	\$161,486	\$166,236	\$170,985	\$175,735	\$180,484	\$185,234
15	\$167,603	\$173,190	\$178,776	\$184,363	\$189,950	\$195,200 **	\$195,200 **	\$195,200 **	\$195,200 **	\$195,200 **
16	\$196,568	\$203,120	\$207,500 *	\$207,500 *	\$207,500 *	\$207,500 *	\$207,500 *	\$207,500 *	\$207,500 *	\$207,500 *
17	\$207,500 *	\$207,500 *	\$207,500 *	\$207,500 *	\$207,500 *	\$207,500 *	\$207,500 *	\$207,500 *	\$207,500 *	\$207,500 *
18	\$207,500 *	\$207,500 *	\$207,500 *	\$207,500 *	\$207,500 *	\$207,500 *	\$207,500 *	\$207,500 *	\$207,500 *	\$207,500 *

* 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 6

JUDICIARY SALARY PLAN
Los Angeles-Long Beach, CA - Table LA
36.47% Locality Payment Included
Effective January 13, 2025

Grade	1	2	3	4	5	6	7	8	9	10
1	\$30,515	\$31,538	\$32,552	\$33,563	\$34,576	\$35,168	\$36,173	\$37,184	\$37,225	\$38,171
2	\$34,311	\$35,127	\$36,264	\$37,225	\$37,643	\$38,749	\$39,856	\$40,963	\$42,070	\$43,176
3	\$37,439	\$38,687	\$39,934	\$41,181	\$42,429	\$43,676	\$44,923	\$46,171	\$47,418	\$48,665
4	\$42,026	\$43,427	\$44,829	\$46,231	\$47,632	\$49,034	\$50,435	\$51,837	\$53,238	\$54,640
5	\$47,019	\$48,586	\$50,153	\$51,719	\$53,286	\$54,853	\$56,419	\$57,986	\$59,553	\$61,119
6	\$52,414	\$54,161	\$55,908	\$57,654	\$59,401	\$61,148	\$62,895	\$64,642	\$66,389	\$68,135
7	\$58,244	\$60,186	\$62,128	\$64,070	\$66,012	\$67,954	\$69,896	\$71,838	\$73,780	\$75,722
8	\$64,503	\$66,653	\$68,804	\$70,955	\$73,106	\$75,256	\$77,407	\$79,558	\$81,709	\$83,859
9	\$71,244	\$73,619	\$75,993	\$78,368	\$80,742	\$83,117	\$85,492	\$87,866	\$90,241	\$92,615
10	\$78,455	\$81,070	\$83,685	\$86,300	\$88,914	\$91,529	\$94,144	\$96,759	\$99,373	\$101,988
11	\$86,199	\$89,071	\$91,944	\$94,817	\$97,689	\$100,562	\$103,435	\$106,307	\$109,180	\$112,053
12	\$103,316	\$106,760	\$110,205	\$113,649	\$117,094	\$120,538	\$123,983	\$127,427	\$130,872	\$134,317
13	\$122,857	\$126,953	\$131,048	\$135,144	\$139,239	\$143,334	\$147,430	\$151,525	\$155,621	\$159,716
14	\$145,180	\$150,019	\$154,858	\$159,697	\$164,536	\$169,376	\$174,215	\$179,054	\$183,893	\$188,733
15	\$170,769	\$176,461	\$182,153	\$187,845	\$193,538	\$195,200 **	\$195,200 **	\$195,200 **	\$195,200 **	\$195,200 **
16	\$200,281	\$206,957	\$207,500 *	\$207,500 *	\$207,500 *	\$207,500 *	\$207,500 *	\$207,500 *	\$207,500 *	\$207,500 *
17	\$207,500 *	\$207,500 *	\$207,500 *	\$207,500 *	\$207,500 *	\$207,500 *	\$207,500 *	\$207,500 *	\$207,500 *	\$207,500 *
18	\$207,500 *	\$207,500 *	\$207,500 *	\$207,500 *	\$207,500 *	\$207,500 *	\$207,500 *	\$207,500 *	\$207,500 *	\$207,500 *

* 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 7

PLACE NAME**FIPS**

Clark County, NV	32003
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Nye County, NV	32023
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Arizona**PLACE NAME****FIPS**

Mohave County, AZ	04015
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Los Angeles-Long Beach, CA**PLACE NAME****FIPS**

Imperial County, CA	06025
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Kern County, CA	06029
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Los Angeles County, CA	06037
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Orange County, CA	06059
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Riverside County, CA	06065
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San Bernardino County, CA	06071
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San Luis Obispo County, CA	06079
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Santa Barbara County, CA	06083
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Ventura County, CA	06111
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