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Attorneys for Plaintiff, on a representative basis and on behalf of all others similarly situated

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

JOEL ARELLANO, individually, on a
representative basis, and on behalf of all
others similarly situated;

Plaintiff,

vs.

PACIFIC AWARD METALS, INC., a
California Corporation; and DOES 1 through
20, inclusive;

Defendants.

Case No.: 22STCV13489

*[Assigned to Hon. David S. Cunningham, III,
Dept 11, for all purposes]*

**DECLARATION OF KRISTINA BUI
CARLSON, ESQ., IN SUPPORT OF
PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

Complaint filed: April 22, 2022

I, Kristina Bui Carlson, state and declare:

1. I am an attorney duly licensed to practice law in the State of California and am
an Associate at Lauby, Mankin & Lauby LLP, attorneys for Plaintiff in the above-entitled
action. I am fully familiar with the facts of this case. The matters set forth herein are based
upon my personal knowledge. I submit this declaration in support of Plaintiff's Motion for
Final Approval of this Class Action Settlement and, if called upon as a witness, I could and
would give competent testimony with respect to the matters contained herein.

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HOURLY RATE

6. My billing rate is \$600 per hour, and this rate is usual and customary for class action and/or PAGA practitioners with my level of expertise and experience.

7. This rate is consistent with Plaintiff and Defense attorneys who handle complex class action litigation, if not somewhat lower. For instance, the Wolters Kluwer 2020 Real Rate Report (“Real Rate Report”) states that the median rates for associates in Los Angeles is \$576.00 per hour, with the upper quartile rate at \$770.00 per hour. The Real Rate Report also notes that the median and upper quartile rates for associates with 7 or more years of experience are \$520 and \$789, respectively. Being that I have been in practice for over 10 years, my experience falls squarely within the confines of that range, at a rate lower than those in the Real Rate Report.

8. Importantly, the Real Rate Report data is not based on self-reported numbers, surveys, or sampling – instead, these figures are based on an analysis of the actual amounts billed to clients based on more than 25.8 million billing entries and 23.9 million hours billed by over 112,100 individual timekeepers from 4,620 law firms, totaling \$9.02 billion in fees billed. And, specifically, the Los Angeles data is based on review of 1,311 associates and the corresponding time and rates each billed to their client.

9. My requested rate is also reasonable, consistent, and less than the rate found in the Laffey Matrix (www.laffeymatrix.com), which indicates that the benchmark rate for an attorney that graduated law school in 2013 is \$676 per hour.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on June 17, 2024, at Riverside, California.

By: 
Kristina Bui Carlson, Esq.