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

KANDACE BATTLE and RACHEL CHRISTINA GOODWIN, individually and on behalf of all others similarly situated and the State of California under the Private Attorneys General Act, Plaintiffs, vs. CALIFORNIA CLINIC MANAGEMENT, LLC and DOES 1 through 50, inclusive, Defendants.	Case No. 37-2023-00039498-CU-OE-CTL *Hon. Loren G. Freestone* *Dept. 64* **Declaration of Nicholas J. Ferraro in Support of Plaintiffs' Motion for Approval of PAGA Action Settlement** **PAGA Approval Motion:** Date: May 9, 2025 Time: 10:30 a.m. Action Filed: September 12, 2023

I, Nicholas J. Ferraro, declare as follows:

1. I am counsel of record for Plaintiff Kandace Battle in this action. I am principal of Ferraro Vega Employment Lawyers and an attorney licensed to practice law in the State of California and in Washington State. I submit this declaration in support of Plaintiffs' Motion for Approval of PAGA Action Settlement. If called as a witness, I would testify honestly to the facts below based on my personal knowledge. Attached to this declaration are true and correct copies of the following documents and records:

Exhibit 1	Notice to the LWDA of Proposed PAGA Settlement
Exhibit 2	Brightflag Report: "Hourly Rates in Am Law 100 Firms: Increases and Key Drivers"
Exhibit 3	Ferraro Vega Firm Resume

Compliance with Labor Code section 2699.3

2. On July 7, 2023, my office submitted written notice to the Labor and Workforce Development Agency on behalf of Plaintiff Battle asserting claims for civil penalties under the Private Attorneys General Act using the LWDA's online filing system. A true copy of the PAGA Notice is on file with the Court, attached as Exhibit 2 to the operative Complaint.

3. On September 12, 2023, after more than sixty-five days passed without notice from the Defendant or involvement from LWDA, my office filed the operative complaint in this action on behalf of Plaintiff Battle.

4. On March 28, 2025, prior to filing the Motion for Approval of PAGA Action Settlement and this declaration with the Court, my office submitted Notice of Proposed Settlement of this PAGA action to the LWDA electronically using the LWDA's electronic filing system. *See* Exhibit 1.

5. If the Court signs the Proposed Order Approving the PAGA Settlement under Labor Code § 2699(s)(2) and enters judgment accordingly, I will submit a copy of the Superior Court's judgment to the LWDA within 10 days using the LWDA's electronic filing system.

Fees and Costs

6. Pursuant to our attorney client agreement with our client and the terms of the Settlement, our office seeks contingency fees in the amount of 33.33% of the Settlement.

7. Additionally, my firm has requested reimbursement of litigation costs as follows:

Category	Costs
OneLegal and Filing Fees	$756.45
Expert Fees	$5,640.00
Mediation Fees	$4,250.00
LWDA Filing Fee	$75.00
Postage	$11.59
PAGA Approval Est. Costs[1]	$250.00
Total	**$ 10,983.04**

Hours Expended

8. Ferraro Vega Employment Lawyers represents employees on a contingency fee basis. Our attorney fee agreement authorizes the recovery of attorneys' fees based on a percentage of the common fund. If a case is unsuccessful, our clients are not obligated to reimburse us for the costs incurred. Therefore, we take on the risk of the case for the benefit of the client and class as a whole. A few of these risks, and a general description of the nature of our contingency practice, follows.

a. Unlike my former practice as a defense attorney, defending companies in class action and other employment lawsuits, plaintiffs' class action attorneys do not get paid by the hour in regular billing cycles. Instead, on every case, there is no recovery unless we win. The cases that are often presented to the Court are cases like this one where there is a successful outcome and resolution, with what can be a substantial recovery of funds. However, for every case with a final approval or settlement order that is successful, there are an equal or greater number of others that result in an unsuccessful outcome. In the wage and hour context, it is not uncommon to have a prior settlement releasing the claims at issue in the case you have filed, an inability of the defendant to pay or resolve the case on a class or PAGA basis, a defendant or its counsels' efforts to settle individually with employees and effectively "gut" the case, merits issues that develop based on strong overlooked factual

[1] Estimated future costs include OneLegal filing fees for the motion for PAGA approval, compliance report, and courtesy copy fees.

defenses of the employer, among the usual risks such as the legal challenges in certifying cases as class actions when there is a rampant problem (such as rest breaks) but very little documentary evidence (and the case boils down to conflicting testimony).

b. On these cases, the defendant employer is often represented by the top AmLaw 100 or 200 law firms, or well-established full-service litigation firms with excellent lawyers. The defendant employer often has insurance that covers some aspect of their defense and are often well prepared to handle the litigation. The quality and sophistication of defense representation is typically excellent, with hardworking, motivated associate attorneys. Our formidable adversaries on the opposite side of the aisle have the benefit of non-contingent, hourly work, based on market-based billing rates.

c. There is a substantial "non-billable" time investment required in this line of work. A significant portion of my hours, my partner and associates' hours, and the hours of my legal assistants, law clerks, and other hourly staff, are spent on activities that are what I call "double non-billable." First, they are not billable because we never charge our clients or potential clients an hourly fee. Second, this work is non-billable because the time will never be submitted to the Court for approval in a class action settlement motion. For example, we do hundreds if not thousands of free consultations each year for employees. Most employees do not have a case and need general advice that ranges from setting an appropriate meeting with the Human Resources Department to voice your issue, to simply advising employees that the actions are not illegal and therefore they have no case. Additionally, we often research and investigate cases, spending upwards of 50-100 hours, only to find out that there is a prior case or settlement in a different county or district, or there is an arbitration agreement that precludes the case altogether, or the company has financial issues. These are a few examples of the time incurred that is never billed or recovered. Our firm must absorb these costs, which is why the contingency practice only works when the risk is appropriately accommodated.

d. We must front 100% of the costs associated with the case, as well as our internal overhead. Our firm does not employ litigation financing, so everything is funded through hard work, with our firm taking on all the lending risk. All costs on every case are advanced by my firm without interest. In these cases, we advance all costs of the litigation (which can generally range from $15,000 to more than $150,000), in addition to covering internal firm costs such as payroll, rent, equipment, insurance, software licenses, research, and other usual law firm overhead, and take on 100% of the risk if the case is unsuccessful. At the outset of a case, you do not know if the defendant is going to settle or if they wish to litigate it for two to five years. In cases worth hundreds of thousands or millions of dollars, defendants often want to drag cases out for years to delay payment.

e. The labor and employment attorney market is competitive, and my firm has to compete to retain and hire talented attorneys from the same firms that we go up against, and which have the benefit of non-contingent, hourly billing and payment structures. Defense associates at many of these firms earn a starting salary in excess of $200,000 with associate salaries increasing in the eighth year to more than $400,000, before bonuses are earned. *The 2024 salary survey*, CHAMBERS ASSOCIATES, https://www.chambers-associate.com/law-firms/law-firm-salaries (last visited Sept. 18, 2024); *see also* "Big Law Associate Compensation Soars to $240k for 1st Years, $550K for 8th Years," TaxProf Blog, https://taxprof.typepad.com/taxprof_blog/2023/12/biglaw-associate-compensation-soars-to-240k-for-1st-years-550k-for-8th-years-.html (Dec. 1, 2023). Partners at these firms earn significantly more. As a public interest, boutique law firm with a focus on retaining talent through the quality of our work, the focus of our work, helping regular people and having a positive impact on corporate policy and compliance, we also need to remain competitive in the market to retain and hire attorneys who always have the opportunity to take their skills to work in defense of companies in these matters.

f. Through our fully contingent practice and due to the size of our firm (approx. 15 employees), the hours expended in this litigation precluded us from working on other matters. Due to the nature of our practice, we were also precluded from working on hourly, billable cases that did not bear the same risk profile as this one. However, as mentioned, it is our practice to only represent employees in cases like this one, and so we do not solicit hourly billable work but instead are dependent upon the continency practice entirely.

g. As an additional point of reference, this Court may be further aware that the standard contingency fee for personal injury (and other similar litigation) ranges from 33.33% for a prelitigation settlement, to 40% once a lawsuit has been filed, to the upwards of even 50% if the case proceeds through trial. These cases are subject to the private market's range for contingency fee rates and allow individuals to obtain counsel through the contingency fee model. Class action litigation fees, which are subject to the scrutiny and approval of the court, are well within the low range of these contingency rates that other attorneys and law firms generally charge for single-plaintiff work. This supports the fee award here, particularly given the public interest served and number of individuals who benefit from settlements such as these.

h. Our view, reflected in the case law, is that the contingency model, tempered by the lodestar multiplier cross-check, helps account for these and other risks. Because there are a lot of sunk time and costs on cases and potential cases that are never filed or never settled, the contingency fee structure is really the backbone of this practice and a core element of access to justice keeping our firm and others like it in business and with the necessary resources to advance the interests of our clients and the public at large in litigation that the Legislature has deemed important and that we believe in.

9. Our attorneys' fees are provided for in the Settlement Agreement, which authorizes an attorneys' fee of 33.33% of the settlement fund. Additionally, our fully contingent Attorney-Client Retainer Agreement with our client provides that fees shall be calculated for any class settlement as a percentage of the settlement fund.

10. My office worked 65 hours on this case, excluding non-billable secretarial and administrative work which includes time spent from the initial investigation, through the pre-filing mediation and pre-filing informal exchange of data and documents, through mediation and settlement and this approval motion.

11. Our hourly rate is $600 per hour, based on the skill and experience of Attorneys Nicholas Ferraro and Lauren Vega. This hourly rate has been approved in the class action approvals listed on our Firm Resume.

12. The reasonableness of these rates is confirmed by comparing them with the rates of other counsel practicing complex and class litigation, as detailed in the National Law Journal Billing Survey. *See e.g. Zest IP Holdings, LLC v. Implant Direct MFG., LLC*, 2014 U.S. Dist. LEXIS 167563 (S.D. Cal. 2014) (finding that "Mayer Brown's $775 average billing rate for partners" and "Mayer Brown's

$543 average associate billing rate" are reasonable rates when compared within 21 other firms practicing in the Southern District of California). Moreover, these hourly rates are generally in line with rates prevailing in this community for similar services by lawyers of reasonably comparable skill, experience, and reputation. *See, e.g., Soler v. Cnty. of San Diego*, No. 14cv2470-MMA (RBB), 2021 U.S. Dist. LEXIS 114484, *15 (S.D. Cal. Jun. 18, 2021) (collecting cases and noting that "courts in this District have awarded hourly rates for work performed in civil cases by attorneys with significant experience anywhere in the range of $550 per hour to more than $1000 per hour"); *Herring Networks, Inc. v. Maddow*, No. 19-cv-1713-BAS-AHG, 2021 U.S. Dist. LEXIS 23163, *18-21 (S.D. Cal. Feb. 5, 2021) (collecting cases awarding fees based on hourly rates in the range of $295 to $943 and concluding that "reasonable rates in this district for those of comparable skill, experience, and reputation" were between $470 to $1,150); *Khoja v. Orexigen Therapeutics*, No. 15-cv-00540-JLS-AGS, 2021 U.S. Dist. LEXIS 230105, at *31 (S.D. Cal. Nov. 30, 2021) (holding the lodestar cross-check (which included partner rates of $925-$1,100) supported a fee representing 33.3 percent of the common fund).Additionally, San Diego County Superior Court Judge Sturgeon approved our attorneys' fees based on our submission of an hourly rate set forth on the *Laffey Matrix*'s $700+ per hour benchmark for attorneys with 8 years of experience in *Belmontez-Carillo v. Metropolitan Area Advisory Committee*, San Diego Sup. Ct. Case No. 37-2019-00054227-CU-OE-CTL (Hon. Eddie C. Sturgeon) (Feb. 23, 2023). Our motion papers in that case asked the Court to cross check our rates (and those of our co-counsel) using the *Laffey Matrix*, an inflation-adjusted methodology of attorney rates for lawyers of varying experience levels first approved by the U.S. Court of Appeals for the District Court of Columbia in *Laffey v. Northwest Airlines, Inc.*, 746 F.2d 4 (D.C. Cir. 1984). The *Laffey Matrix*, for attorneys with up to 8 years' experience, provides for a median rate of $733 per hour. In *Belmontez*, the Court approved the fee motion and final approval motion without discussion or analysis.

13. These rates are further supported by the actual billing rates in the San Diego market. For example, based on publicly available litigation filings from this year, the market rate for employment law attorneys, based on those presently in effect at San Diego's largest law firm by attorney headcount, Procopio, Cory, Hargreaves & Savitch, are as follows: $710 for Partner and $510 for Associate (5th Year). Partner and blended rates at other AmLaw 100 law firms are often higher according to a report from a recent methodology. *See* Exhibit 2 (2024 Am Law 100 Billing Rate

Methodology). The high hourly rates reflect increasing overhead, costs of living, attorney costs, inflation, and other pressures. The landscape for contingency attorneys is even more challenging, warranting comparable rates. Our practice operates on a 100% contingent fee basis, whereby we cover the litigation costs for our clients and do not require repayment in the event the case does not result in a prevailing outcome or settlement. We take on the risk of the case and work efficiently and effectively for our clients. Based on these factors and the foregoing information, we respectfully request the Court approve the request for reimbursement of attorneys' fees in this case consistent with the Settlement Agreement.

Experience of Counsel

14. I am counsel of record in more than one dozen wage and hour class and representative actions filed throughout the State of California, in state and federal courts.

15. My law firm has substantial experience handling wage and hour class, FLSA collective, and PAGA actions in California, as well as wage and hour class and collective actions in Washington State, where I am also licensed. Many of the California cases we have handled and been approved as adequate class counsel are listed on our Firm's Resume, attached as Exhibit 3.

16. I have also previously served as defense counsel in numerous class action lawsuits, including through final judgment in *Espinosa v. California College of San Diego, Inc., et al.* (U.S. District Court, S.D. Cal., Case No. 17CV00744 [Hon. Michael M. Anello]).

17. I am a graduate of the University of San Diego School of Law, where I was a member of the *San Diego Law Review* and recipient of a Dean's Honor Scholarship.

18. I was admitted to the State Bar of California in 2015 and worked at Simpson Delmore Greene as an attorney. While at this firm I was primarily staffed on employment litigation and counseling matters helping small and large employers.

19. In May 2016, I accepted an associate attorney position on the employment law team at the national law firm of Gordon Rees Scully Mansukhani, at its Downtown San Diego office, where I specialized in the defense of wage and hour and employment lawsuits filed by employees.

20. In March 2017, I accepted an associate attorney position in the labor and employment department of the Philadelphia-based international law firm of Duane Morris LLP, at its Downtown

San Diego office. At Duane Morris, I had a particular focus on the defense of wage and hour class and PAGA actions.

21. In August 2018, I voluntarily resigned from Duane Morris to start my own law practice, which I called Ferraro Employment Law (now known as Ferraro Vega Employment Lawyers). Currently, about 90 percent of my practice is dedicated exclusively to prosecuting wage and hour class and representative actions under the California Labor Code, California Private Attorneys General Act, California Business and Professions Code, and the Fair Labor Standards Act. Approximately 10 percent of my practice is dedicated to individual claims involving unpaid wages, wrongful termination, discrimination, harassment, and retaliation claims arising under the California Fair Employment and Housing Act, California Labor Code, and common law. A portion of my practice involves helping businesses comply with California and federal employment laws.

22. As a lawyer who focuses exclusively on labor and employment law issues, I have had articles included in various written and online publications, including *California Employment Law Letter*, *HR Daily Advisor*, Lexology, and in client alerts and newsletters. I have been asked to speak on wage and hour and employment law issues during classes at the University of San Diego School of Law, San Diego State University, and with the San Diego HR Forum, among other conferences and seminars for clients hosted by my previous law firm employers.

23. In November 2022, I presented on wage and hour class and PAGA actions as a guest lecturer in an Employment Law class at the University of San Diego School of Law. In September 2021, I helped create and lead a training seminar for the labor standards enforcement attorneys at the California Department of Industrial Relations (DIR) on selected wage and hour litigation and arbitration issues. I have also served as a panelist at the San Diego County Bar Association's 2019 Labor & Employment Law Conference, and again at the San Diego County Bar Association's 2021 Labor and Employment Law Conference.

24. I currently serve on the Wage and Hour Committee for the California Employment Lawyers Association and have held prior leadership positions with the Association of Business Trial Lawyers (San Diego) and San Diego County Bar Association (Labor & Employment Law Section).

25. In 2022, the *San Diego Business Journal* named me as "Top 100 Leaders in Law" in their annual publication. For the past five years, from 2019 through 2023, Thomson Reuters' Super Lawyers rating service recognized me as a "Rising Star" in the area of Class Actions. This is a marketing honor that is awarded to 2.5 percent of California lawyers under the age of 40. For the years of 2022 and 2023, *Best Lawyers* included me as "The Best Lawyers in America: Ones to Watch" for California labor and employment lawyers.

26. Defense counsels are skilled and sophisticated lawyers, with significant class and representative action experience, from a well-established law firm. Defense counsels' defense and counsel to their client throughout this case is reflective of their substantial skill and experience in similar litigation.

Concluding Statements

27. In sum, I believe that the settlement in this case is fair, reasonable, and congruent with the strengths and weaknesses of this case. I respectfully ask that the settlement be approved by the Court.

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

Respectfully submitted,

Dated: April 1, 2025 ***Ferraro Vega Employment Lawyers, Inc.***

Nicholas J. Ferraro

Nicholas J. Ferraro
Attorney for Plaintiff Kandace Battle

Exhibit 1

FERRARO VEGA
SAN DIEGO EMPLOYMENT LAWYERS

Liana Jackson <liana@ferrarovega.com>

Thank you for your Proposed Settlement Submission

1 message

DIR PAGA Unit <no-reply@formassembly.com> Fri, Mar 28, 2025 at 9:11 AM
To: lwda@ferrarovega.com

03/28/2025 09:10:33 AM

Thank you for your submission to the Labor and Workforce Development Agency.

Item submitted: Proposed Settlement
If you have questions or concerns regarding this submission or your case, please send an email to pagainfo@dir.ca.gov.

DIR PAGA Unit on behalf of
Labor and Workforce Development Agency

Website: http://labor.ca.gov/Private_Attorneys_General_Act.htm

--
Sent to: lwda@ferrarovega.com

Exhibit 2

Hourly Rates in Am Law 100® Firms:

Increases and Key Drivers[1]

brightflag

Table of Contents

[1] The AM LAW 100 is a registered trademark of ALM Global Properties, LLC, which has no affiliation with Brightflag or this report.

Introduction

In 2023 many companies faced the combined challenge of persistent inflation and a challenging market, leading to the need to seek cost efficiencies across the business.

In this context, timekeeper rates and the inevitable requests for increases that roll in as the year ends warrant close inspection.

In-house teams have an obligation to maximize the return they receive from outside counsel spend; at no time is this more true than when budgets are tight. Hourly rates are a key driver of legal spend, so negotiating reasonable timekeeper rates is an important source of cost control.

As we head into timekeeper rate request season, when in-house teams will be inundated with requests to increase rates in 2024, in-house teams need data to understand timekeeper rate increase norms and have informed discussions with their firms. Apart from arbitrarily limiting annual increases, in-house teams may not be fully aware of the other levers they can pull to control rates and make their legal budget go further.

This report aims to equip in-house teams with the insights they need to negotiate better rates and to define a cost-effective resourcing strategy.

Methodology

This report analyzes annual rate increase trends and the key drivers of rates among the Am Law® 100, the top 100 US law firms as ranked by ALM[2], using Brightflag's database of billions of dollars of outside counsel spend.

ALM ranks the 100 largest US law firms by revenue. While the rates of these top firms tend to be higher than non-ranked firms due to the firms' size and market power, most in-house teams rely heavily on ranked firms for large tranches of work — especially the matters that drive a majority of annual spend.

Billed rates, i.e., the rates firms actually charge on invoices, are used as the basis of the analysis, as opposed to rack rates or requested rates. Where 2023 rates data is analyzed in the report, data on work billed from January 1 to September 30 2023 is used. For analysis of 2022 and 2021 rates, full-year data is used.

This report demonstrates how the rates of the top 100 US firms have increased in the last year, and explores other key drivers of rates, such as firm size, practice area, and geographic location. The report uses this data to provide recommendations to help in-house teams drive the most value from their outside counsel engagements.

[2] ALM Global Properties, LLC is the owner of U.S. Trademark Registration No. 2313571 for the mark "THE AM LAW 100".

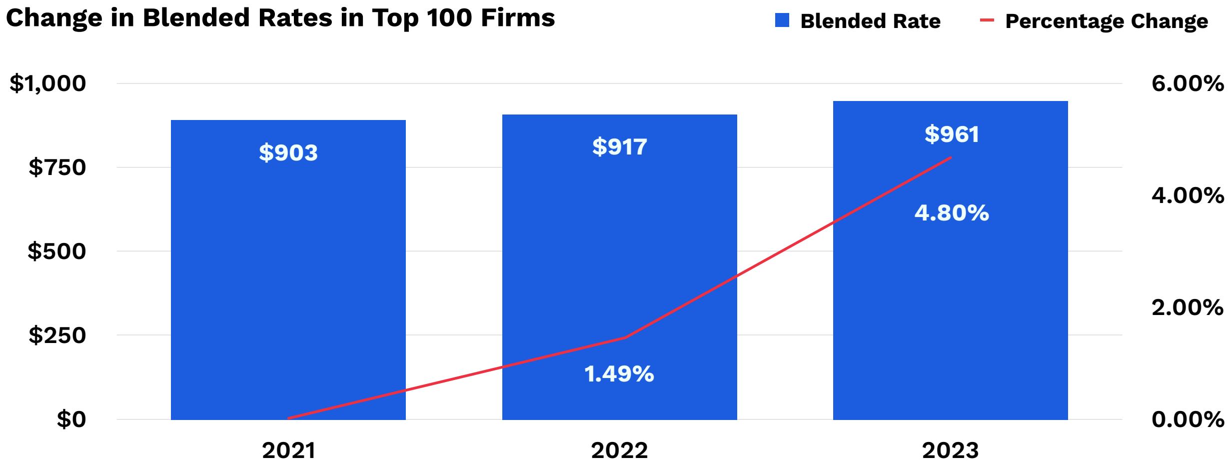
Rate Increases

At the end of 2022, many industry experts predicted an historic rise in outside counsel rates was on the horizon due to high inflation.

Brightflag's data suggests that a surge in rates did occur, although not to the degree predicted. Nevertheless, the increase has had a significant impact on the price in-house teams pay for outside counsel services.

The below chart reports on the change in the blended rate charged by the top 100 US firms when compared to the preceding year. The blended rate is calculated by dividing the total amount outside counsel billed for work by the total hours billed. It represents the amount in-house teams were charged for one hour of outside counsel engagement.

Change in Blended Rates in Top 100 Firms



The blended rate for the top 100 firms increased by 4.8% in 2023 when compared to 2022 rates. In 2022, the blended rate increased by 1.5% when compared with 2021. This means that the increase experienced in 2023 was over three times higher than the increase of the preceding year.

As the blended rate considers the time billed by each fee earner, a rise in blended rates can reflect both a rise in the rates charged by individual fee earners, or a relative increase in billing by more senior fee earners that charge higher hourly rates. Brightflag's data on the average rates charged per fee earner type suggests that the key driver of increases in 2023 was a rise in individual fee earner rates, as opposed to a drastic change in matter resourcing.

The Key Drivers of Rates

In-house teams tend to repeatedly instruct work to the same outside counsel teams at the same firms year over year, with little consideration of whether the particular partner they are instructing will resource matters cost-effectively.

On an individual basis, this behavior makes sense. Trust in your outside counsel partners, long-standing relationships, and a deep knowledge of your business go a long way towards the efficient and successful resolution of any one matter.

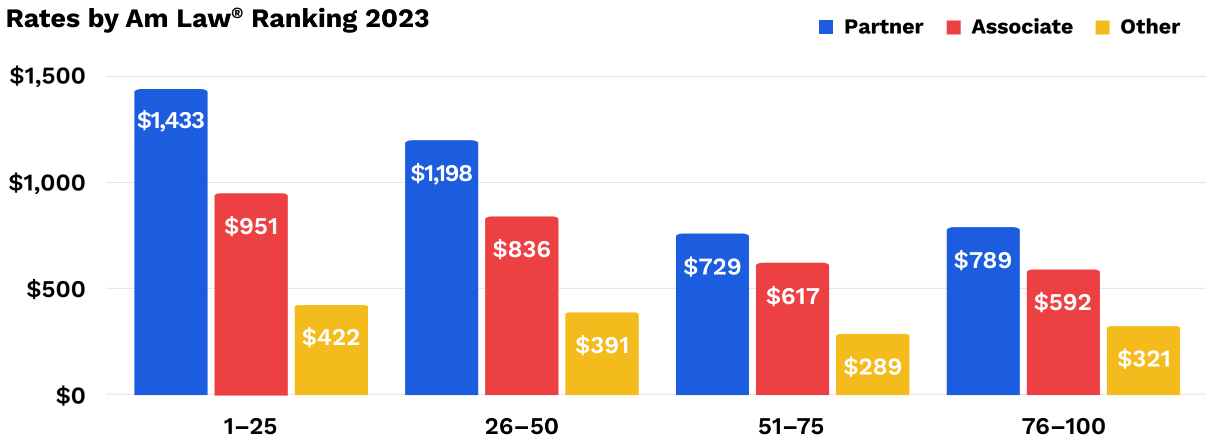
On the aggregate level, however, the shortcomings of this approach become apparent. Engaging top law firms on low-risk, routine matters can too easily become the norm for in-house teams, and can have a large impact on the legal budget.

Below, we explore the factors that lead to high hourly rates, and offer tactics in-house teams can use to create a more cost-conscious engagement strategy.

Firm Size

One of the key drivers of rates is the bargaining power of the firms you engage. The size and prestige of the firm heavily influence hourly rates. While in-house teams intuitively know this, the true monetary impact of engaging top firms may not be fully understood.

The below chart shows the differences in rates between firms based on their ranking on the Am Law 100® list.



As expected, higher-ranked firms charge more per hour than lower-ranked firms. Digging into these figures reveals surprising insights. For example, partners in the top 25 firms charge almost double that of firms with rankings 51 and above. In addition, associates in the top 50 firms charge more than partners in firms with rankings 51 and above.

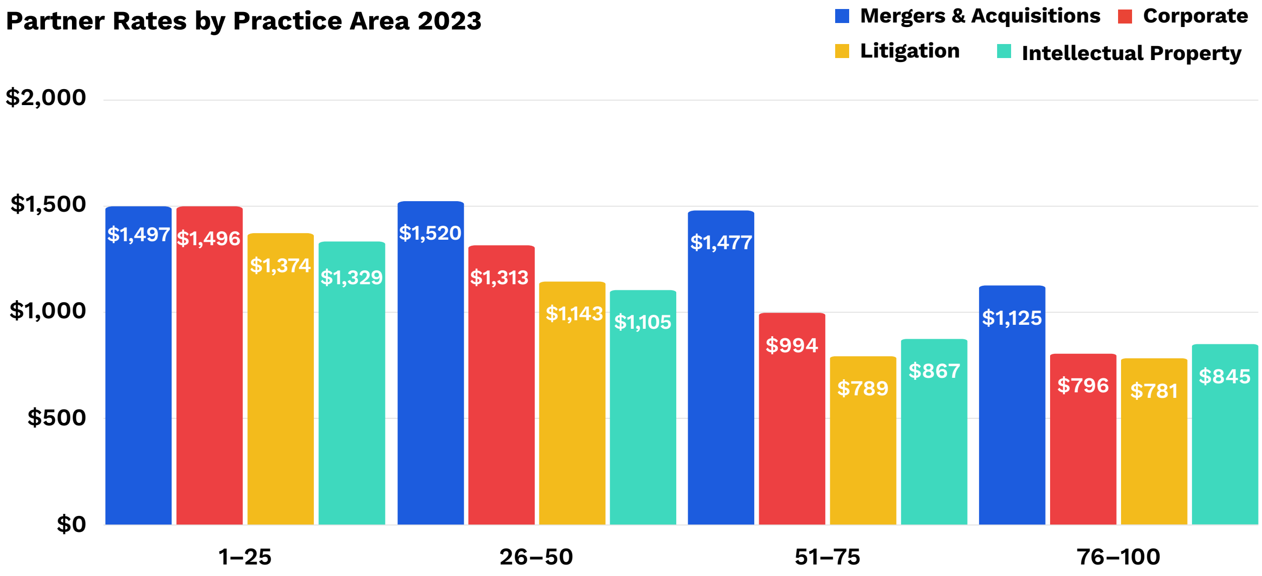
This demonstrates the significant savings that can be made by moving work from the highest-cost firms to smaller, more cost-efficient firms. It should also be noted that this data only covers the top 100 US law firms. Moving work from top firms to regional and boutique firms will have an even larger impact on spend.

It can be difficult to convince in-house attorneys that have long-standing, valued relationships with top firms to start instructing work to other firms. And for your highest risk and most strategic matters, making a change may not be prudent. But for run-of-the-mill work, the savings that can be achieved from changing your engagement strategy are compelling and warrant serious consideration.

Practice Area

Practice area is another key driver of outside counsel rates. M&A and corporate work yields the highest partner rates across firm size for the top 100 US firms.

Partner Rates by Practice Area 2023



It is important to highlight that this report analyzes work performed on an hourly rate basis. It can be assumed that IP work instructed to top firms represents strategic advice on complex IP matters, rather than business-as-usual registration and enforcement work, resulting in a substantial hourly rate. Even still, the premium charged by the top 25 firms compared to other ranked firms is evident.

An interesting trend can be observed in M&A rates across firm rankings. While partner rates in all other practice areas fall steadily in line with firm ranking, M&A rates remain at higher levels across rankings. This may reflect high demand for M&A services across the top 100 US firms.

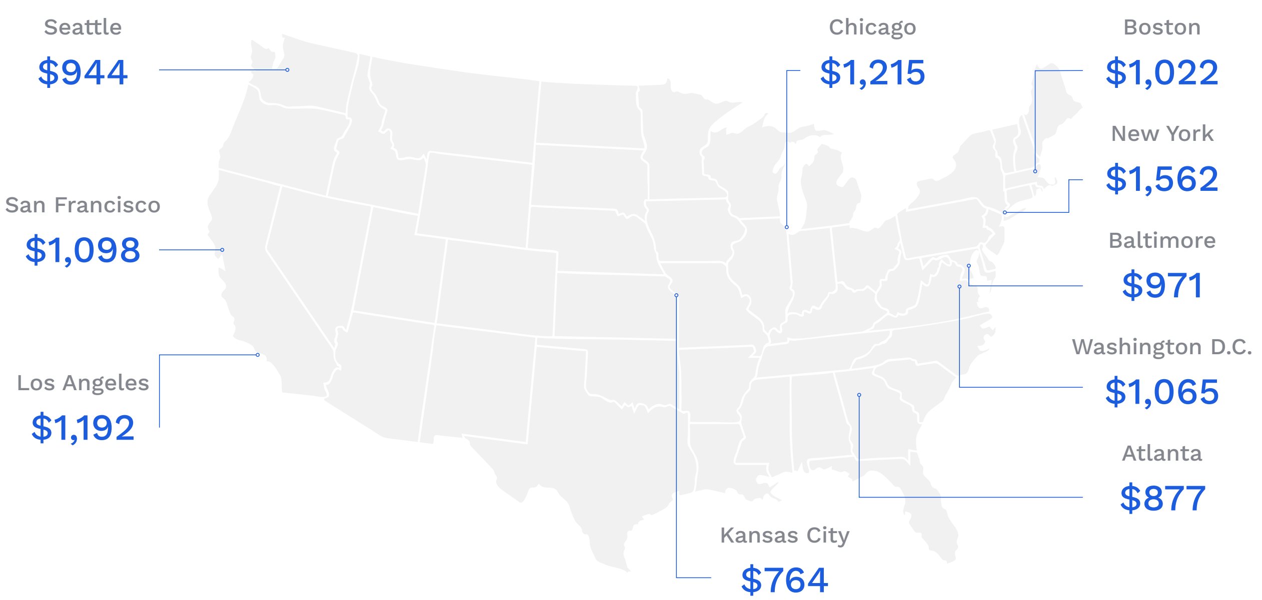
Despite this trend in M&A rates, it can still be seen that while rates differ per practice area, there is a financial benefit to moving work in all matter types to smaller firms.

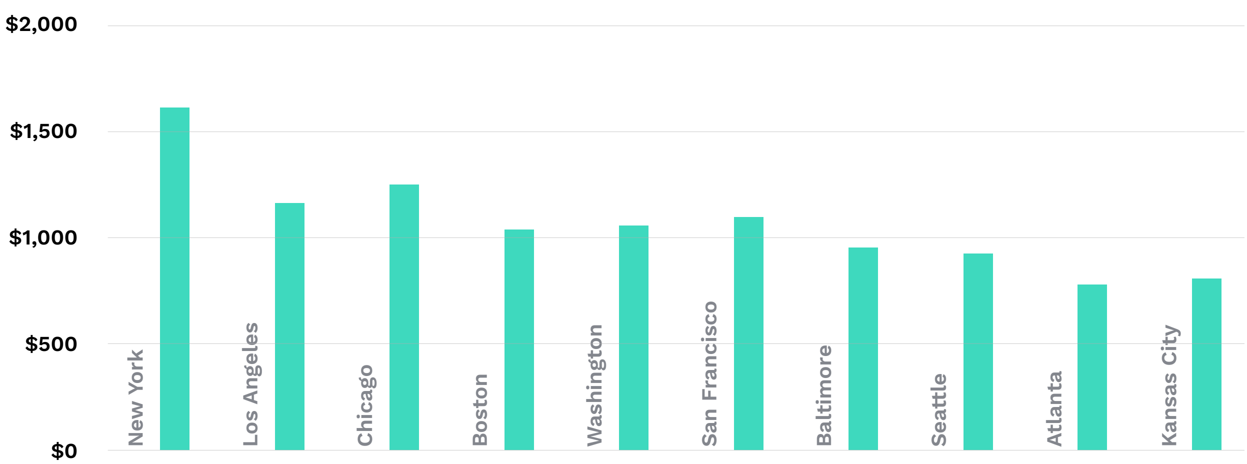
Geography

In addition to firm size and practice area, the location of fee earners performing work has a large impact on rates.

The below graphic shows average partner rates from the top 100 US firms in a selection of metro areas, demonstrating that hourly rates in larger regions such as New York and Los Angeles are higher than in smaller ones.

Partner Rates by Metro Area 2023





As with other drivers of rates, the degree to which geographic location impacts rates reveals more interesting insights.

Brightflag's data shows that even within the top 100 US firms, partner rates in the largest cities are 40-50% higher than those in smaller cities. Therefore, working with outside counsel in smaller cities can have a major impact on outside spend, even if you continue to work with top firms.

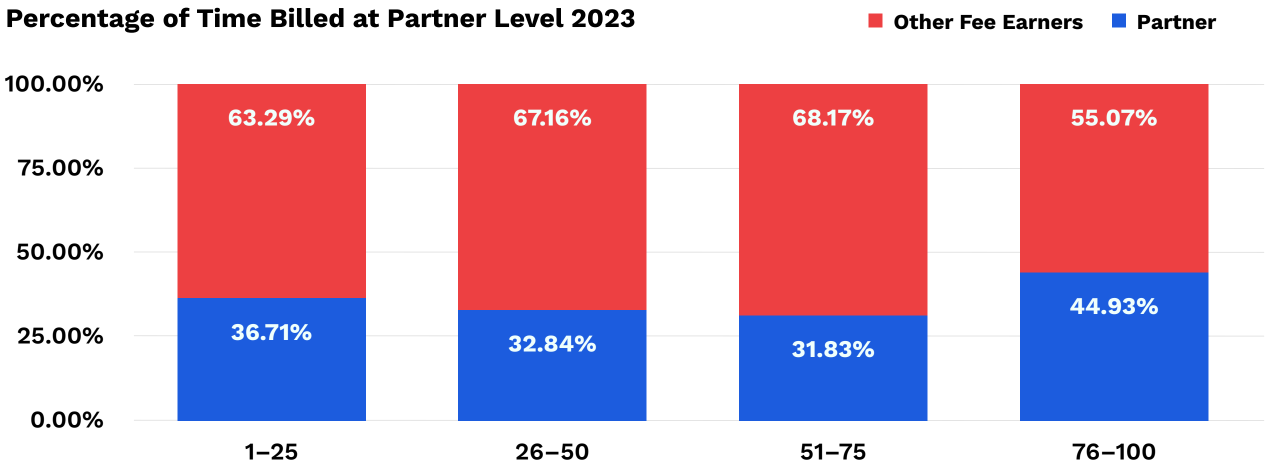
Of course, it is not always practical, or even possible, to move work to different locations. Litigation and regulatory advice, for example, often require state-level expertise. If your company is engaged in litigation in California or a new data protection regulation is developed there, for example, you may need to pay higher rates for attorneys in that region. However, even in these examples, savings can be achieved by stratifying work and sending tasks that do not require state-based expertise to alternative legal service providers or to lower-cost attorneys working in other jurisdictions.

For other matter categories, such as general corporate advice and patent registration, savings can be achieved by moving matters wholesale to more cost-effective locations. Brightflag's data shows that the pattern of savings at the practice area level largely reflects the average savings shown above, with upwards of $700 of savings an hour possible on partner rates when corporate or IP work is done in smaller cities.

The Impact of Resourcing

Rates themselves are not the only factor impacting spend. Partners charge significantly more than associates and other fee earners, particularly in the top 50 firms where partner rates are 40-50% higher than associate rates. Because of this, it's important that firms resource effectively and do not overburden engagements with partner hours when work could be done more cost-efficiently by other fee earners.

Percentage of Time Billed at Partner Level 2023



The above graph shows that the top 100 US firms tend to resource between 30-45% of work at partner level. Digging into the data shows that differences in partner time billed among top firms can have a large impact on overall costs.

For example, Brightflag's data shows that the top 25 firms tend to resource approximately 37% of work at partner level, while firms with a rank of 26-75 resource closer to 32% of work at partner level. This means that the top 25 firms bill 16% more work at partner level. Combine this with the fact that rates are higher at the top 25 firms, and the cumulative impact is a significantly higher cost when working with these firms.

Equally, while firms with a ranking of 76-100 use more partner time, partners at these firms charge rates that are 80% lower than the top 25 firms. Therefore, although these firms use significantly more partner time, this is not likely to significantly impact overall spend.

The below table illustrates the combined impact of these considerations for a hypothetical matter requiring 200 hours of work:

Firm Ranking	**1–25**	**26–50**	**51–75**	**76–100**
Partner Hours	73	66	64	90
Partner Rate	$1,433	$1,198	$729	$789
Associate Hours	127	134	136	110
Associate Rate	$951	$836	$617	$592
Total Cost	**$225,386**	**$191,092**	**$130,568**	**$136,130**

No matter the size of the firm you engage, limiting partner time to the amount strictly necessary is a prudent cost control strategy.

Recommendations

This report has explained timekeeper rate increase trends and explored key drivers of rates. Armed with this data, in-house teams can have strategic conversations with firms about acceptable rate increases, and can also create an engagement strategy that generates significant cost efficiencies.

However, effectively controlling timekeeper rates is not a one-and-done task. To truly get a handle on outside counsel rates, and therefore on legal spend, in house teams need to:

Use a system to enforce agreed rates

It's impossible to have informed rate discussions if you don't know what rates you are currently being charged. To do this effectively, in-house teams should require that firms submit requests for rates for all fee earners via an e-billing and matter management system. Once you have received such rate requests and approved them, your e-billing system does the heavy lifting of ensuring that the agreed rates are charged on every invoice.

Use a system to understand changes in rates

Once you have a baseline of agreed rates, you can use your e-billing system to periodically gather rate increase requests. For example, many in-house teams mandate that increase requests only be submitted once per year. Once rate requests are submitted, you can leverage your e-billing tool to understand the percentage increase the new request represents when compared to the rate that is currently in effect and the reason for the requested increase to determine whether it is appropriate.

Create an outside counsel engagement strategy

As noted in this report, it is all too easy for in-house teams to continue instructing work to the same firms they have always used, without considering the cost efficiencies that can be gained from a more structured approach to resourcing.

To create an effective outside counsel engagement strategy, it's best to first determine the factors that are driving your spend. For example, you can assess your outside counsel spend by vendor, matter type and geographical location to identify the areas with the biggest potential for efficiencies. Again, a good e-billing tool helps here by giving you immediate access to this key information. Once you have determined the areas of focus for your new engagement strategy, use benchmarking information such as the data in this report to help you define how you should redirect work.

Use a risk matrix to use Am Law 100 firms only when appropriate

If you instruct Am Law 100 firms today, they're likely to remain an important part of your engagement strategy, even after identifying work that can be moved to lower-cost firms. So how can your in-house counsel know when to engage these top firms and when to instruct work to other providers?

Creating a risk matrix is the best way to ensure that only your highest risk and most complex matters are instructed to Am Law 100 firms. You can do this by tracking a risk and complexity score on each of your matters. Matters that are both high risk and high complexity can continue to be instructed to Am Law 100 firms, while other matters can go to regional firms, alternative providers, or be resourced with internal staff.

Monitor partner time

As shown in this report, excessive billing of partner time can have an outsized impact on legal spend. Therefore, along with an effective resourcing strategy, every firm you instruct should be asked to limit partner time to the amount strictly necessary. In-house teams should monitor partner resourcing by their firms regularly to ensure that actual billing is in line with this expectation.

About Brightflag

Brightflag is modern e-billing and matter management software for legal teams and their finance partners to operate like a business, backed by the best customer service you've ever experienced. Clorox, Shopify, Volvo, and other leading companies use Brightflag to create and protect business value by effectively controlling their budget. It's the only platform that has AI at its core powering e-billing, financial reconciliation, financial planning, and vendor benchmarking.

About the Authors

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Director of Data Science, Brightflag

Michael leads data science at Brightflag and is passionate about AI and the future of legal operations. He is the architect of Brightflag's patented AI engine.

Michael has a Masters in Machine Learning from DIT Dublin and an MLitt in Philosophy from the University of St Andrews in Scotland.

Prior to Brightflag, Michael worked in consulting helping UK and Irish organizations leverage machine learning to enhance their operations and customer targeting.

Sarah Scales

Head of Product Marketing, Brightflag

Sarah Scales leads product marketing at Brightflag, including developing thought leadership and research for the benefit of the in-house legal community.

Sarah has previously worked as a product manager at Brightflag, a change manager for the European Medicines Agency, and a market researcher for a variety of public projects.

Sarah has a Bachelor of Law and Political Science from Trinity College Dublin and is pursuing a Masters in Product Management from Technological University Dublin.

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Exhibit 3

Ferraro Vega Employment Lawyers, Inc.
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LAW FIRM RESUME

Ferraro Vega Employment Lawyers was founded in 2018 and represents plaintiffs throughout California in class, collective, and representative actions under the California Labor Code, Private Attorneys General Act, and Fair Labor Standards Act.

PRINCIPAL ATTORNEYS

Nicholas J. Ferraro, Esq.
California State Bar No. 306528 (admitted 2015)
Washington State Bar No. 59674 (admitted 2022)

Education
University of San Diego School of Law (J.D., *San Diego Law Review*)
Gonzaga University (B.A.)

During law school, Mr. Ferraro externed for a federal magistrate in the U.S. District Court for the Southern District of California, worked in the law school library as a library clerk, and as a legal intern for a San Diego-based commercial real estate company.

Employment
Attorney, Ferraro Vega Employment Lawyers (2018 to present)
Attorney, Duane Morris LLP (2017 to 2018)
Attorney, Gordon Rees Scully Mansukhani (2016 to 2017)
Attorney & Law Clerk, Simpson Delmore Greene LLP (2014 to 2016)

Prior to starting the firm, Mr. Ferraro worked in the employment law practice groups of Gordon Rees and Duane Morris, where he advised companies, drafted employee policies and agreements, and defended employers in class action and PAGA litigation.

Organizations
Wage and Hour Committee Member, California Employment Lawyers Association (2020 to 2024)
Leadership Development Committee, Association of Business Trial Lawyers (2017 to 2019)
Sexual Harassment Task Force, Lawyers Club of San Diego (2018)

Presentations and Publications
Guest Lecturer, University of San Diego School of Law Employment Law Classes (various)

Attorney Panelist, California Dept. of Labor Standards Enforcement Seminar (Sept. 2021)
Panelist, San Diego County Bar Association Labor & Employment Conference (2019, 2021)
Publications in *California Employment Law Letter*, *HR Daily Advisor*, Lexology, and various firm newsletters and alerts

Awards
Super Lawyers "Rising Star" in the field of Class Actions (2019 to 2024)
Best Lawyers "Ones to Watch" for Employment Lawyers (2021 to 2024)
"Leaders in Law Awards" Nominee in *San Diego Business Journal* (2022)

Lauren N. Vega, Esq.
California State Bar No. 306525 (admitted 2015)

Education
University of San Diego School of Law (J.D., *San Diego Law Review*)
University of California, San Diego (B.A.)

During law school, Ms. Vega was an active participant in moot court. She received the Outstanding and Best Brief Awards in back-to-back years at the Duberstein Moot Court Competition in New York City. She also served as a judicial extern for federal judges in the Southern District and Central District.

Employment
Attorney, Ferraro Vega Employment Lawyers (2020 to present)
Attorney, Procopio, Cory, Hargreaves & Savitch (2015 to 2020)

Prior to joining the firm, Ms. Vega defended employers as defense counsel in approximately 50 class and PAGA actions throughout California. She also advised companies on wage and hour compliance and drafted employee policies, procedures, and agreements.

Organizations
Member, California Employment Lawyers Association (2020 to present)

Presentations and Publications
Speaker, Procopio's Annual Labor & Employment Seminar (2015 to 2019)
Publications in *Los Angeles Daily Journal* and various firm newsletters

Awards
Super Lawyers "Rising Star" in the field of Class Actions (2022, 2023)
Best Lawyers "Ones to Watch" for Employment Lawyers (2021 to 2024)
"Leaders in Law Awards" Nominee in *San Diego Business Journal* (2021)

Mariela Romo, Esq.
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Education
University of San Diego School of Law (J.D.)
University of California, Santa Barbara (B.A. Political Science)

During law school, Ms. Romo externed for a federal magistrate in the U.S. District Court for the Southern District of California and worked as a law clerk for federal and local government agencies and a non-profit law firm. Ms. Romo was also part of the Moot Court team and a member of the Elections Committee.

Employment
Attorney, Ferraro Vega Employment Lawyers (2024 - Present)
Attorney, Mattis Law APC (2023)
Attorney, Legal Aid Society of San Diego (2022-2023)
Attorney & Law Clerk, Gruenberg Law (2021-2022)

Elyssa Martinez, Esq.
California State Bar No. 355589 (admitted 2024)

Education
University of San Diego School of Law (J.D.)
Grand Canyon University (B.A.)

Certificates
The Theory and Practice of Mediation, National Conflict Resolution Center

During law school, Ms. Martinez worked as a law clerk for Ferraro Vega Employment Lawyers. Ms. Martinez also worked as law clerk for the San Diego County Public Defender's Office and the Superior Court in the Office of the Family Law Facilitator. Ms. Martinez served on the boards of the Employment and Labor Law Society, First Generation Legal Professionals, and La Raza student organizations

Employment
Attorney & Law Clerk, Ferraro Vega Employment Lawyers, Inc. (2022 to Present)
Law Clerk, San Diego Public Defender's Office (Fall 2021)
Law Clerk, San Diego Superior Court Office of the Family Law Facilitator (Summer 2021)

Xavier L. Woodford, Esq.
California State Bar No. 355326 (admitted 2024)

Education
Thomas Jefferson School of Law (J.D.)
Rutgers University – New Brunswick (B.A.)

During law school, Mr. Woodford worked as a law clerk at the Law Office of Marco Antonio Rodriguez. Mr. Woodford was an active board member in the Student Bar Association of TJSL and the Real Property Law Organization of TJSL. Mr. Woodford was an active mentor in the Crawford Legal Institute & Leadership Bond and the Black Law Student Association of TJSL. Mr. Woodford was also an active member of the Diversity & Inclusion Committee of TJSL and La Raza of TJSL.

Certifications & Certificates
Certified Law Student (2022 to 2023)
Certificate of Recognition from Councilmen Stephen Whitburn (2023)
U.S. House of Representatives Certificate of Special Recognition (2022)
California State Legislature Certificate of Recognition (2022)

Employment
Attorney, Ferraro Vega Employment Lawyers (2024 – Present)
Law Clerk & Attorney, Hogue & Belong Law (2023 – 2024)
Law Clerk, Law Office of Marco Antonio Rodriguez (2022 – 2023)

OF COUNSEL ATTORNEYS

Rick A. Waltman, Esq.
Rick Waltman Law, APC
University of San Diego School of Law (J.D., *San Diego Law Review*)
California State Bar No. 306463 (admitted 2015)

PARALEGALS & STAFF

Marissa Rodriguez
Paralegal

Employment
Paralegal, Ferraro Vega Employment Lawyers, Inc. (2024 to present)
Paralegal, Hoffman & Forde Attorneys at Law (2022-2023)
Legal Assistant/Paralegal, Mesnik Law Group (2019-2022)

Education
California State University, Chico (Bachelor of Arts)

Liana Jackson
Paralegal

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Paralegal, Ferraro Vega Employment Lawyers, Inc. (2024 to present)
Paralegal, Hoffman & Forde Attorneys at Law (2022-2024)
Paralegal, Law Offices of Anna R. Yum (2019-2022)

Education
University of San Diego School of Law (Paralegal Certificate)
University of Mary Washington (Bachelor of Arts)

Isabel Tostado
Paralegal

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Paralegal, Ferraro Vega Employment Lawyers, Inc. (2025 to present)
Paralegal, J. Doling Law, PC. (2019-2024)
Paralegal, Doling Shaw & Hanover, APC (2016-2019)
Paralegal, Law Offices of Jenny L. Doling, APLC (2008-2016)

Education
Kaplan University, Palm Springs (Associate of Science)

Secretaries and legal assistants not listed.

FORMER ATTORNEYS

David X. Lin, Esq.
Northwestern University School of Law (J.D.)

Elida M. Espinoza, Esq.
California Western School of Law (J.D., 2016)
California State Bar No. 314001 (admitted 2017)

Rayne Brown, Esq.
University of San Diego School of Law (J.D., 2021)
California State Bar No. 342011 (admitted 2021)

CLASS & REPRESENTATIVE ACTIONS

Erica Jones v. Bay City Equipment Industries, Inc., et al. San Diego Sup. Ct. Case No. 37-2023-00046654-CU-OE-CTL (Hon. Marcella O. McLaughlin) (March 14, 2025)

Trevor Morton v. Associated Microbreweries, LTD., dba Karl Strauss Brewing Company, et al. San Diego Sup. Ct. Case No. 2020-00016542-CU-OE-CTL (Hon. Katherine Bacal) (February 24, 2025)

Michael Del Toro v. Abzena (San Diego) Inc., et al. San Diego Sup. Ct. Case No. 37-2023-00017443-CU-OE-CTL (Hon. Joel R. Wohlfeil) (February 20, 2025)

Albert Federico v. A.S.I. Hastings, Inc., et al. San Diego Sup. Ct. Case No. 37-2023-00012941-CU-OE-CTL (Hon. Michael T. Smyth) (February 10, 2025)

Cesar Flores v. NextEra Energy Operating Services, LLC, et al. San Diego Sup. Ct. Case No. 37-2023-00034497-CU-OE-CTL (Hon. Richard S. Whitney) (February 7, 2025)

Brook Freeze v. MHX, LLC, et al. San Bernardino Sup. Ct. Case No. CIVSB2205903 (Hon. Christian Towns) (February 6, 2025)

Lisset Tredo v. Ademco Inc., et al. San Diego Sup. Ct. Case No. 37-2023-00027207-CU-OE-CTL (Hon. Carolyn Caietti) (January 31, 2025)

Mariana Robles v. Louis Vuitton USA, Inc., et al. San Diego Sup. Ct. Case No. 37-2022-00042954-CU-OE-CTL (Hon. Robert Longstreth) (January 29, 2025)

Irving Williams v. Trident Maritime Systems, LLC, et al. San Diego Sup. Ct. Case No. 37-2023-00021186-CU-OE-CTL (Hon. Marcella O. McLaughlin) (January 10, 2025)

Janeth Robledo v. Global Equity Finance Inc., et al. San Diego Sup. Ct. Case No. 37-2022-00023181-CU-OE-CTL (Hon. Michael T. Smyth) (January 10, 2025)

Alexa Basnar v. Desert Ventures EWC1, LLC, et al. San Bernardino Sup. Ct. Case No. CIVSB2307814 (Hon. Christian Towns) (January 6, 2025)

Jaime De La O v. Scout Distribution LLC, et al. San Diego Sup. Ct. Case No. 37-2023-00030227-CU-OE-CTL (Hon. Carolyn M. Caietti) (December 20, 2024)

Hannah Lightfoot v. Dispatchhealth Management, LLC, et al. San Diego Sup. Ct. Case No. 37-2023-00031018-CU-OE-CTL (Hon. Blaine K. Bowman) (November 22, 2024)

Carlos Lira v. Anheuser-Busch, LLC, San Diego Sup. Ct. Case No. 37-2023-00038074-CU-OE-CTL (Hon. Matthew C. Braner) (November 18, 2024)

Raquel Felix v. Innovative Emergency Management, Inc., et al. San Diego Sup. Ct. Case No. 37-2023-00012142-CU-OE-CTL (Hon. Matthew C. Braner) (October 25, 2024)

Ricardo Flores v. Skaggs Mission Support Specialists, LLC, et al. San Diego Sup. Ct. Case No. 37-2023-00051810-CU-OE-CTL (Hon. Matthew C. Braner) (October 25, 2024)

Ashley Nunez Estrada v. Baxter Hotel Group, Inc., et al. San Diego Sup. Ct. Case No. 37-2023-00052417-CU-OE-CTL (Hon. Katherine A. Bacal) (October 16, 2024)

Phuong Tran, et al. v. Johnson Matthey, Inc., San Diego Sup. Ct. Case No. 37-2023-00029095-CU-OE-CTL (Hon. Richard S. Whitney) (October 4, 2024)

Caitlin Raymond v. Alphatec Spine, Inc., et al. San Diego Sup. Ct. Case No. 37-2023-00012914-CU-OE-CTL (Hon. Joel Wohlfeil) (October 4, 2024)

Jessica Hayward v. Aztec Shops, LTD., et al. San Diego Sup. Ct. Case No. 37-2023-00007756-CU-OE-CTL (Hon. Carolyn Caietti) (September 26, 2024)

Ralph Shakespeare v. Iron Wall Security, Inc., et al. San Diego Sup. Ct. Case No. 37-2023-00006539-CU-OE-CTL (Hon. Loren G. Freestone) (September 26, 2024)

Michael Gibbs v. ASA Carlton, Inc., et al. San Diego Sup. Ct. Case No. 37-2023-00007130-CU-OE-CTL (Hon. Richard S. Whitney) (September 23, 2024)

Eloy Herrera v. Calpine Operating Services Company, Inc., et al. San Diego Sup. Ct. Case No. 37-2023-00007065-CU-OE-CTL (Hon. Blaine K. Bowman) (September 20, 2024)

Robert Bennett v. Patriot Environmental Services Inc., et al. San Diego Sup. Ct. Case No. 37-2022-00044044-CU-OE-CTL (Hon. Matthew C. Braner) (September 13, 2024)

Aramburo v. Jacksons Food Stores, Inc., et al. San Diego Sup. Ct. Case No. 37-2023-00009655-CU-OE-CTL (Hon. Marcella O. McLaughlin) (September 10, 2024)

Dustin Evers v. LZB Retail, Inc., D/B/A La-Z-Boy, et al. San Diego Sup. Ct. Case No. 37-2021-00047960-CU-OE-CTL (Hon. James A. Mangione) (September 5, 2024)

Semira Trujillo v. FFC San Diego, LLC, et al. San Diego Sup. Ct. Case No. 37-2022-00046517-CU-OE-CTL (Hon. Carolyn Caietti) (September 5, 2024)

Anthony Davide v. SFFIT Ventures LLC, et al. , San Diego Sup. Ct. Case No. 37-2022-00036078-CU-OE-CTL (Hon. Michael T. Smyth) (August 23, 2024)

Isaiah Harris v. Austal USA LLC, San Diego Sup. Ct. Case No. 37-2023-00034540-CU-OE-CTL (Hon. James A Mangione) (August 2, 2024)

Raggy Sarkis v. Glory Global Solutions, Inc., et al., San Diego Sup. Ct. Case No. 37-2023-00021170-CU-OE-CTL (Hon. Richard S. Whitney) (August 2, 2024)

Roberto Mendez v. Deployed Services, LLC, et al., San Diego Sup. Ct. Case No. 37-2023-00036201-CU-OE-CTL (Hon. Blaine K. Bowman) (July 12, 2024)

Kevin Dougan v. Centerplate Inc., et al., San Diego Sup. Ct. Case No. 37-2022-00040792-CU-OE-CTL (Hon. Carolyn M. Caietti) (June 28, 2024)

Jennifer Andrade v. Sombrero Cor, Inc., et al., San Diego Sup. Ct. Case No. 37-2023-00043518-CU-OE-CTL (Hon. Richard S. Whitney) (June 26, 2024)

Juan Weason v. Plastic Express, et al., San Diego Sup. Ct. Case No. 37-2022-00022203-CU-0E-CTL (Hon. Richard S. Whitney) (June 24, 2024)

Jerardo Villa v. Investment Concepts, Inc., Ventura Sup. Ct. Case No. 56-2022-00572556-CU-OE-VTA (Hon. Henry Walsh) (June 20, 2024)

Manuel Fernandez v. VLS Environmental Solutions, LLC, et al., San Diego Sup. Ct. Case No. 37-2023-00021038-CU-OE-CTL (Hon. Richard S. Whitney) (June 7, 2024)

Desiree Berry v. TD Ameritrade, Inc., et al., San Diego Sup. Ct. Case No. 37-2022-00004165-CU-OE-CTL (Hon. Blaine K. Bowman) (June 7, 2024)

Jacob Becerra v. Michael Kors Stores (California), LLC, et al., San Diego Sup. Ct. Case No. 37-2022-00021768-CU-OE-CTL (Hon. Wendy M. Behan) (May 29, 2024)

Whitney Begle v. R.W. Selby & Co., Inc., San Diego Sup. Ct. Case No. 37-2022-00017612-CU-OE-CTL (Hon. Richard S. Whitney) (May 10, 2024)

Charlie McElhanon v. McLane/SunEast, Inc., San Bernardino Sup. Ct. Case No. CIVSB2214190 (Hon. Joseph T. Ortiz) (May 16, 2024)

Roberto Hernandez v. All One God Faith, Inc. d/b/a Dr. Bronner's Magic Soap, San Diego Sup. Ct. Case No. 37-2023-00008069-CU-OE-CTL (Hon. Blaine K. Bowman) (May 10, 2024)

Jesus Salazar v. Westcott Enterprises, Inc., San Diego Sup. Ct. Case No. 37-2022-00048854-CU-OE-CTL (Hon. Robert Longstreth) (May 9, 2024)

Elizabeth Tijero, et al. v. Imperial Beach Community Clinic, San Diego Sup. Ct. Case No. 37-2022-00042973-CU-OE-CTL (Hon. Loren G. Freestone) (April 10, 2024)

Jenelle Olea, et al. v. The Stepping Stones Group LLC, et al., San Diego Sup. Ct. Case No. 37-2022-00040884-CU-OE-CTL (Hon. Kenneth J. Medel) (April 12, 2024)

Jaime Collins, et al. v. Maximus Human Services, Inc., et al., Los Angeles Sup. Ct. Case No. 19STCV17916 (Hon. Carolyn B. Kuhl) (April 4, 2024)

Gabriel Lafarga v. G.I. Trucking Company d/b/a Estes West, et al., San Diego Sup. Ct. Case No. 37-2022-00028993-CU-OE-CTL (Hon. Gregory W. Pollack) (March 15, 2024)

Madelynn Black v. EWC East Bay, Inc., San Diego Sup. Ct. Case No. 37-2022-00009708-CU-OE-CTL (Hon. Kenneth J. Medel) (March 12, 2024)

Seth Chance v. Colonna's Shipyard Incorporated, San Diego Sup. Ct. Case No. 37-2022-00018968-CU-OE-CTL (Hon. Gregory W. Pollack) (Mar. 8, 2024)

Samuel Medina v. Prime Residential, San Diego Sup. Ct. Case No. 37-2023-00047293-CU-OE-CTL (Hon. Katherine Bacal) (Feb. 26, 2024)

Isle Robles v. Anzar Enterprises Inc., San Diego Sup. Ct. Case No. 37-2021-00052808-CU-OE-CTL (Hon. Richard S. Whitney) (Feb. 22, 2024)

Gutierrez v. Redi-Carpet Sales of California, LLC, San Diego Sup. Ct. Case No. 37-2022-00021779-CU-OE-CTL (Hon. Loren G. Freestone) (Feb. 9, 2024)

Tadena-Chua v. Acumen Fiscal Agent LLC, San Diego Sup. Ct. Case No. 37-2021-00052766-CU-OE-CTL (Hon. Marcella O. McLaughlin) (Dec. 19, 2023)

Ohler v. Cluckin Inc. et al. San Diego Sup. Ct. Case No. 37-2021-00053292-CU-OE-CTL (Hon. Katherine Bacal) (Dec. 1, 2023)

Cardenas v. Under Armour Retail, Inc., San Diego Sup. Ct. Case No. 37-2022-00026843-CU-OE-CTL (Hon. Kenneth J. Medel) (Nov. 30, 2023)

Caro-Santiago et al. v. Southwest Key Program, San Diego Sup. Ct. Case No. 37-2022-00021991-CU-OE-CTL (Hon. Marcella O. McLaughlin) (Nov. 17, 2023)

Nguyen v. TriLink Biotechnologies, LLC, San Diego Sup. Ct. Case No. 37-2022-00019578-CU-OE-CTL (Hon. Marcella O. McLaughlin) (Nov. 2, 2023)

Sanz et al. v. Sterling Jewelers, Inc. et al., San Diego Sup. Ct. Case No. 37-2022-00015148-CU-OE-CTL (Hon. Gregory Pollack) (Oct. 13, 2023)

Perez v. The GEO Group, Inc. et al. San Diego Sup. Ct. Case No. 37-2022-0000067-CU-OE-CTL (Hon. Joel R. Wohlfeil) (Oct. 6, 2023)

Reyes v. Parkside Lending, LLC, San Diego Sup. Ct. Case No. 37-2022-00022628-CU-OE-CTL (Hon. Joel R. Wohlfeil) (June 12, 2023)

Wood v. 2018HMO LLC (dba Hikei Modern Cannabis), San Diego Sup. Ct. 37-2021-00053035-CU-OE-CTL (Hon. Carolyn M. Caietti) (Apr. 14, 2023)

Garcia v. STG International, Inc., U.S. Dist. Ct., S.D. Cal. No. 20-CV-1701-AJB (Hon. Anthony J. Battaglia) (Apr. 13, 2023)

Belmontez-Carillo v. Metropolitan Area Advisory Committee, San Diego Sup. Ct., 37-2019-00054227-CU-OE-CTL (Hon. Eddie C. Sturgeon) (Feb. 24, 2023)

Chowning, et al. v. Freedom Mortgage Corp., San Diego Sup. Ct., 37-2022-00005613-CU-OE-CTL (Hon. Matthew C. Braner) (Feb. 16, 2023)

Abid v. TEEMA, Inc., San Diego Sup. Ct., 37-2021-00039986-CU-OE-CTL (Hon. Matthew C. Braner) (Oct. 14, 2022)

Blount v. Host Healthcare, Inc., U.S. Dist. Ct., S.D. Cal., No. 21-CV-310-MMA (Hon. Michael M. Anello) (Apr. 12, 2022)

Ramirez v. Towne Park, LLC, San Diego Sup. Ct., No. 37-2020-00003942-CU-OE-CTL (Hon. Katherine A. Bacal) (Feb. 18, 2022)

Loreto v. General Dynamics Information Technology, Inc., U.S. Dist. Ct., S.D. Cal., No. 19-CV-0166-GPC (Hon. Gonzalo P. Curiel) (Jan. 28, 2022)

Knox v. Planet Fitness, Inc., San Diego Sup. Ct., No. 37-2019-00043225-CU-OE-CTL (Hon. Carolyn M. Caietti) (Aug. 6, 2021)

Egan et al. v. Premier Healthcare Services, LLC, San Diego Sup. Ct., 37-2019-00020223-CU-OE-CTL (Hon. Ronald L. Styn) (Jan. 29, 2021) (PAGA representative action)

Jimenez v. Reyes Holdings, LLC, San Diego Sup. Ct., No. 37-2019-00051577-CU-OE-CTL (Hon. Joel R. Wohlfeil) (Jan. 15, 2021)

Rojas v. Constellation Homebuilder Systems, et al., San Diego Sup. Ct., No. 37-2019-00035229-CU-OE-CTL (Hon. Katherine A. Bacal) (Dec. 11, 2020)

Sanchez, et al. v. Lodi Memorial Hospital Association, San Joaquin Sup. Ct., No. STK-CV-UEO-2019-09557 (Hon. Roger Ross) (PAGA representative action)

Soto, et al. v. Bonita Packing Co. (Santa Barbara Sup. Ct., No. 19CV02543 (Hon. Timothy J. Staffel) (Oct. 28, 2020)