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[Additional counsel on following page]

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

PAMELA RACE, SUSAN MOHAMED, and
JUDITH SMULAND, on behalf of others
similarly situated and the State of California under
the Private Attorneys General Act,

Plaintiffs,

v.

SOUTHWEST HEALTHCARE SYSTEM
AUXILIARY; SOUTHWEST HEALTHCARE
INLAND VALLEY HOSPITAL; SOUTHWEST
HEALTHCARE RANCHO SPRINGS
HOSPITAL; and DOES 1 through 50, inclusive,

Defendants.

Case No. 24CU021889C

Hon. Matthew C. Braner
Dept. 60

**DECLARATION OF CONOR J.D. GOMEZ
IN SUPPORT OF JOINT STIPULATION
REQUESTING APPROVAL OF
REPRESENTATIVE PAGA SETTLEMENT**

[Filed concurrently with Joint Stipulation
Requesting Approval of Representative PAGA
Settlement; Declarations; and [Proposed] Order]

Action Filed: November 12, 2024

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22 Attorneys for Defendant Universal Health Services of Rancho Springs, Inc.
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1 I, Conor J.D. Gómez, declare as follows:

2 1. I am counsel of record for Plaintiffs Pamela Race, Susan Mohamed, and Judith Smuland
3 (“Plaintiffs”) in this action and I am the Settlement Attorney at Ferraro Vega Employment Lawyers,
4 Inc. (“FVEL”). FVEL is co-counsel with the above-captioned firms representing the Plaintiffs
5 (collectively, “Plaintiffs’ Counsel). I am licensed to practice law in the State of California. Attached
6 to this Declaration are true and correct copies of the following documents and records:

7 Exhibit 1 Ferraro Vega Employment Lawyers, Inc. Firm Resume

8 Exhibit 2 *Laffey Matrix*

9 Exhibit 3 Brightflag Report: “Hourly Rates in Am Law 100 Firms: Increases and
10 Key Drivers”

11 **Compliance with Labor Code section 2699.3**

12 2. On August 30, 2024, FVEL, on behalf of Plaintiff Race, submitted written notice to the
13 Labor and Workforce Development Agency (“LWDA”) asserting claims for civil penalties under the
14 Private Attorneys General Act (“PAGA”) using the LWDA’s online filing system. A true copy of the
15 PAGA Notice is on file with the Court, attached as the only exhibit to the operative Representative
16 Action Complaint.

17 3. On November 12, 2024, after more than sixty-five days passed without notice from the
18 Defendant Universal Health Services of Rancho Springs, Inc. (“Defendant”) or involvement from
19 LWDA, FVEL, on behalf of Plaintiff Race, filed the operative complaint in this action.

20 4. On April 28, 2026, FVEL, on behalf of Plaintiff Race, submitted an amended notice to
21 the LWDA.

22 5. On July 10, 2026, FVEL, on behalf of Plaintiff Race, filed a First Amended
23 Representative Action Complaint.

24 6. If the Court signs the Proposed Order Approving the PAGA Settlement under Labor
25 Code § 2699(s)(2) and enters judgment accordingly, Plaintiffs’ Counsel submit a copy of the Superior
26 Court’s judgment to the LWDA within 10 days using the LWDA’s electronic filing system.

27 **The Proposed Settlement**

7. The settlement covers approximately 2,805 aggrieved employees who worked for Defendant from November 12, 2023, to January 31, 2026.

8. The number of pay periods covered by the settlement is approximately 103,127.

9. The estimated Gross Settlement Amount of \$841,579.00 is distributed as follows under the Agreement:

LWDA Payment	\$324,715.73
Payment to PAGA Employees	\$174,846.93
Service Award	\$15,000.00
Attorneys' Fees (one third)	\$280,526.33
Litigation Costs (estimated)	\$30,000.00
Settlement Admin. Costs	\$16,490.00

Fees and Costs

10. Pursuant to our attorney client agreement with our client and the terms of the Settlement, our office seeks contingency fees in the amount of one third of the Settlement.

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

Category	Costs
OneLegal and Filing Fees	\$2,612.35
LWDA Filing Fee	\$150
Postage	\$66.20
Est. Future Fees	\$250
Total	\$3,078.55

Hours Expended

12. Ferraro Vega Employment Lawyers, Inc., 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 obliged 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 a defense attorney, defending companies in class action and other employment lawsuits, plaintiff's 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

1 that is successful, there are an equal or greater number of others that result in an unsuccessful outcome.
2 In the wage and hour context, it is not uncommon to have a prior settlement releasing the claims at
3 issue in the case you have filed, an inability of the defendant to pay or resolve the case on a class or
4 PAGA basis, a defendant or its counsels' efforts to settle individually with employees and effectively
5 "gut" the case, merits issues that develop based on strong overlooked factual defenses of the employer,
6 among the usual risks such as the legal challenges in certifying cases as class actions when there is a
7 rampant problem (such as rest breaks) but very little documentary evidence (and the case boils down
8 to conflicting testimony).

9 b. On these cases, the defendant employer is often represented by the top AmLaw
10 100 or 200 law firms, or well-established full-service litigation firms with excellent lawyers. The
11 defendant employer often has insurance that covers some aspects of their defense and is often well
12 prepared to handle the litigation. The quality and sophistication of defense representation is typically
13 excellent, with hardworking, motivated associate attorneys. Our formidable adversaries on the opposite
14 side of the aisle have the benefit of non-contingent, hourly work, based on market-based billing rates.

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

1 d. We must front 100% of the costs associated with the case, as well as our internal
2 overhead. Our firm does not employ litigation financing, so everything is funded through hard work,
3 with our firm taking on all the lending risk. All costs on every case are advanced by Plaintiff's Counsel
4 without interest. In these cases, we advance all costs of the litigation (which can generally range from
5 \$15,000 to more than \$150,000), in addition to covering internal firm costs such as payroll, rent,
6 equipment, insurance, software licenses, research, and other usual law firm overhead, and take on 100%
7 of the risk if the case is unsuccessful. At the outset of a case, you do not know if the defendant is going
8 to settle or if they wish to litigate it for two to five years. In cases worth hundreds of thousands or
9 millions of dollars, defendants often want to drag cases out for years to delay payment.

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

24 f. Through our fully contingent practice and due to the size of our firm (approx. 15
25 employees), the hours expended in this litigation precluded us from working on other matters. Due to
26 the nature of our practice, we were also precluded from working on hourly, billable cases that did not
27 bear the same risk profile as this one. However, as mentioned, it is our practice to only represent
28

1 employees in cases like this one, and so we do not solicit hourly billable work but instead are dependent
2 upon the contingency practice entirely.

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

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

18 13. Our attorneys' fees are provided for in the Settlement Agreement, which authorizes an
19 attorneys' fee of one third of the settlement fund. Additionally, our fully contingent Attorney-Client
20 Retainer Agreement with our client provides that fees shall be calculated for any class and PAGA
21 settlement as a percentage of the settlement fund.

22 14. FVEL worked approximately 58.1 hours on this case to date, excluding non-billable
23 secretarial and administrative work which includes time spent from the initial investigation, through
24 the pre-filing mediation and pre-filing informal exchange of data and documents, through mediation
25 and settlement and this approval stipulation. This also does not account for the anticipated ten to fifteen
26 hours that will be spent through the approval process. Our hourly rate is \$685 per hour, based on the
27 skill and experience of Attorneys Nicholas Ferraro and Lauren Vega. This hourly rate has been
28 approved in the class and PAGA action approvals listed on our Firm Resume.

1 15. This results in a lodestar of approximately \$39,798.50 and is within the range of
2 reasonableness, when taken together with Plaintiffs' Counsel's total hours expended.¹ *Laffitte v. Robert*
3 *Half International Inc.* (2016) 1 Cal. 5th 480, 489; *Dyer v. Wells Fargo Bank, N.A.*, 303 F.R.D. 326,
4 334 (N.D. Cal. 2014) ("the Ninth Circuit's presumptively acceptable range [is] 1.0-4.0"); *Vizcaino v.*
5 *Microsoft Corp.* (9th Cir. 2022) 290 F.3d 1043, 1050-1052 (awarding 3.65 multiplier).

6 16. The reasonableness of these rates is confirmed by comparing them with the rates of other
7 counsel practicing complex and class litigation, as detailed in the National Law Journal Billing Survey.
8 *See e.g. Zest IP Holdings, LLC v. Implant Direct MFG., LLC*, 2014 U.S. Dist. LEXIS 167563 (S.D.
9 Cal. 2014) (finding that "Mayer Brown's \$775 average billing rate for partners" and "Mayer Brown's
10 \$543 average associate billing rate" are reasonable rates when compared within 21 other firms
11 practicing in the Southern District of California). Moreover, these hourly rates are generally in line
12 with rates prevailing in this community for similar services by lawyers of reasonably comparable skill,
13 experience, and reputation. *See, e.g., Soler v. Cnty. of San Diego*, No. 14cv2470-MMA (RBB), 2021
14 U.S. Dist. LEXIS 114484, *15 (S.D. Cal. Jun. 18, 2021) (collecting cases and noting that "courts in
15 this District have awarded hourly rates for work performed in civil cases by attorneys with significant
16 experience anywhere in the range of \$550 per hour to more than \$1000 per hour"); *Herring Networks,*
17 *Inc. v. Maddow*, No. 19-cv-1713-BAS-AHG, 2021 U.S. Dist. LEXIS 23163, *18-21 (S.D. Cal. Feb. 5,
18 2021) (collecting cases awarding fees based on hourly rates in the range of \$295 to \$943 and concluding
19 that "reasonable rates in this district for those of comparable skill, experience, and reputation" were
20 between \$470 to \$1,150); *Khoja v. Orexigen Therapeutics*, No. 15-cv-00540-JLS-AGS, 2021 U.S. Dist.
21 LEXIS 230105, at *31 (S.D. Cal. Nov. 30, 2021) (holding the lodestar cross-check (which included
22 partner rates of \$925-\$1,100) supported a fee representing 33.3 percent of the common fund).
23 Additionally, San Diego County Superior Court Judge Sturgeon approved our attorneys' fees based on
24 our submission of an hourly rate set forth on the *Laffey Matrix's* \$700+ per hour benchmark for
25

26
27 ¹ When the optional lodestar cross-check is used, the cross-check "calculation need entail neither
28 mathematical precision nor bean-counting," is not intended to be a "full-blown lodestar inquiry," and
"can be performed with a less exhaustive cataloguing and review of counsel's hours." *Barbosa v. Cargill*
Meat Solutions Corp., 297 F.R.D. 431, 451 (E.D. Cal. July 2, 2013).

1 attorneys with 8 years of experience in *Belmontez-Carillo v. Metropolitan Area Advisory Committee*,
2 San Diego Sup. Ct. Case No. 37-2019-00054227-CU-OE-CTL (Hon. Eddie C. Sturgeon) (Feb. 23,
3 2023). Our motion papers in that case asked the Court to cross check our rates (and those of our co-
4 counsel) using the *Laffey Matrix*, an inflation-adjusted methodology of attorney rates for lawyers of
5 varying experience levels first approved by the U.S. Court of Appeals for the District Court of
6 Columbia in *Laffey v. Northwest Airlines, Inc.*, 746 F.2d 4 (D.C. Cir. 1984). The *Laffey Matrix*, for
7 attorneys with up to 8 years' experience, provides for a median rate of \$733 per hour. In *Belmontez*,
8 the Court approved the fee motion and final approval motion without discussion or analysis. See Exhibit
9 2, Laffey Matrix.

10 17. These rates are further supported by the actual billing rates in the San Diego market.
11 For example, based on publicly available litigation filings from this year, the market rate for
12 employment law attorneys, based on those presently in effect at San Diego's largest law firm by
13 attorney headcount, Procopio, Cory, Hargreaves & Savitch, are as follows: \$710 for Partner and \$510
14 for Associate (5th Year). Partner and blended rates at other AmLaw 100 law firms are often higher
15 according to a report from a recent methodology. See Exhibit 3 (2025 Am Law 100 Billing Rate
16 Methodology). The high hourly rates reflect increasing overhead, costs of living, attorney costs,
17 inflation, and other pressures. The landscape for contingency attorneys is even more challenging,
18 warranting comparable rates. Our practice operates on a 100% contingent fee basis, whereby we cover
19 the litigation costs for our clients and do not require repayment in the event the case does not result in
20 a prevailing outcome or settlement. We take on the risk of the case and work efficiently and effectively
21 for our clients. Based on these factors and the foregoing information, we respectfully request the Court
22 approve the request for reimbursement of attorneys' fees in this case consistent with the Settlement
23 Agreement.

24 **Experience & Adequacy of Counsel**

25 18. I am the head of Plaintiffs' Counsel's Settlement Department and counsel of record in
26 more than one dozen wage and hour class and representative actions filed throughout the State of
27 California, in state and federal courts. I lead our firm in ushering class and PAGA representative actions
28 through the settlement process in a smooth and efficient manner.

1 19. As set forth on our Firm Resume, attached hereto as Exhibit 1, Plaintiffs' Counsel has
2 handled many wage and hour class and representative actions through litigation and final judgment.

3 20. I am a graduate of the University of California, Los Angeles School of Law and the
4 University of California, San Diego.

5 21. I was admitted to the State Bar of California in 2021, and I have worked for multiple
6 plaintiff-side employment firms in Southern California, with cases all throughout the State of
7 California. I have over five years of experience working with multiple firms on individual claims
8 involving unpaid wages, wrongful termination, discrimination, harassment, and retaliation claims
9 arising under the California Fair Employment and Housing Act, California Labor Code, and common
10 law, where I consistently settled cases in the five- and six-figure range, and working on class and PAGA
11 representative actions just like this one for wage and hour violations with settlements in the six- and
12 seven-figure range.

13 22. In addition to my legal practice, I am a certified mediator through the California Lawyers
14 for the Arts. I have also worked for the Sacramento Mediation Center. I am also an adjunct professor
15 at the Thomas Jefferson School of Law.

16 23. I have been a guest speaker and lecture at many organizations throughout California,
17 including the University of California, Irvine, and I have presented workshops on various legal topics,
18 including California labor laws, mediation, and settlement. I also make short-form legal information
19 videos on California wage and hour and other employment law topics on my personal online platforms
20 (which has over one-thousand followers to date, and thousands more views) to educate the public on
21 their rights at work.

22 24. I began my career as a transactional attorney representing business, and I have provided
23 advice and counsel to many California for-profit and non-profit organizations regarding labor law
24 compliance, including drafting employment agreements, separation agreements, and employee
25 handbooks. This duality of experience sitting on both sides of the table informs my practice and allows
26 me to work seamlessly with defense counsel to coordinate the approval process.

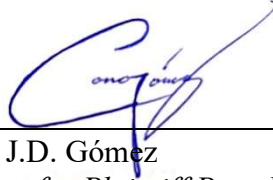
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26. Plaintiffs' efforts as the PAGA Representatives and the basis for the requested Service Award are further detailed in the accompanying Declaration of Plaintiff Pamela Race, Declaration of Plaintiff Susan Mohamed, and Plaintiff Judith Smuland.

27. In sum, I believe that the Settlement in this case is fair, reasonable, and in the PAGA Member's best interests. Plaintiffs' Counsel worked hard and creatively for this Settlement and obtained a positive result for the Aggrieved Employees, with individuals recovering significant compensation. The resolution at mediation presented an excellent opportunity for the Aggrieved Employees to obtain a robust and substantial Settlement, which I believe should be approved litigation.

28. 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.

1
2 I declare under penalty of perjury under the laws of the State of California and the United States
3 of America that the foregoing is true and correct. Executed on September 10, 2026, at San Diego,
4 California.

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7 _____
8 Conor J.D. Gómez
9 *Attorney for Plaintiff Pamela Race*
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EXHIBIT 1

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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)
Washington State Bar No. 65133 (admitted 2026)

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)

Dorota A. James, Esq.

California State Bar No. 309933 (admitted 2016)

Education

University of San Diego School of Law (LL.M., 2014) Comparative Law

University of Saarland Law School (Ph.D., 1999)

University of Saarland Law School (LL.M., 1996) German Law

University of Wroclaw Law School (M.S., summa cum laude, 1994)

Ms. James is a tenth-year attorney with extensive experience handling complex wage-and-hour litigation. For the past ten years, she has served as Plaintiffs' counsel of record in more than fifty (50) wage-and-hour class action and PAGA cases. Prior to her admission to the California Bar in 2016, Ms. James worked as a senior litigation paralegal at a San Diego law firm specializing in plaintiffs' wage-and-hour employment litigation. In that role, she provided comprehensive litigation support in complex class actions, including pre-filing investigation, discovery, pre-mediation analysis, and post-settlement claims administration. During that time, she actively assisted in the litigation of more than fifty (50) employment class action cases.

Honors

Dean's Comparative Law Award (Highest Grade Point Average in L.L.M. Program)

Konrad Adenauer Foundation Scholarship Recipient (German Scholarship for talented foreign students)

Employment

Attorney, Ferraro Vega Employment Lawyers (2025 – Present)

Attorney, Wilshire Law Firm (05/2024 – 02/2025)

Attorney, Dinsmore & Shohl LLP (02/2021 – 05/2024)

Attorney, ShortLegal, APC (10/2018 – 02/2021)

Attorney, Tyson Mendes, LP (02/2018 – 10/2018)

Attorney, Parker Straus, LP (10/2016 – 02/2018)

Senior Paralegal, Graham Hollis APC (10/2007 – 10/2015)

Associate Legal Officer, International Organization for Migration (12/2001 – 02/2005)

Jennifer L. Connor, Esq.

California State Bar No. 241480 (admitted 2006)

Education

University of Notre Dame Law School (J.D., cum laude, 2003)

Boston College (B.A., magna cum laude, 2000)

Boston College School of Theology Ministry (M.Div., 2019)

Ms. Connor is an attorney with over two decades of experience advocating for plaintiffs in civil litigation. Her practice focuses on wage and hour and employment class actions. She

has represented clients in state and federal court forums across various areas, including consumer protection, unfair business practices, product liability, fraud, and antitrust. Ms. Connor is recognized for her strong appellate writing skills, having contributed to significant appellate matters. She has experience in successfully certifying class actions and handling dispositive motions. She has also been appointed as class counsel. Her background includes involvement in numerous putative class, collective, and representative actions and managing hundreds of contested and/or settlement-certified cases, with wage and hour litigation comprising over 50% of her practice.

Civic Organizations

Volunteer, Christian Legal Aid of Los Angeles (CLA-LA)

Volunteer District Attorney, Orange County District Attorney's Office (Trial Attorney Partnership program)

Presentations and Publications

Authored appellate briefs, including for *Aryeh v. Canon Business Solutions, Inc.* (2013) 55 Cal.4th 1185 and a Respondent's Brief before the California Court of Appeal, Fourth Appellate District.

Guest Lecturer on employment law for MCLE, including CELA's 28th Annual Conference

Employment

Attorney, Ferraro Vega Employment Lawyers (2026 - Present)

Attorney, Casey Gerry Francavilla Blatt LLP (2024 - 2025)

Attorney, CounselOne, PC (2020 - 2023)

Attorney, Rex Parris Law Firm (Summer Intern: May -Aug. 2017)

Attorney, Cohelan Khoury & Singer (2014 - 2015)

Attorney, Spiro Moore LLP (2012 to 2014)

Attorney, Westrup Klick, LLP (2004 to 2011)

Conor J.D. Gómez, Esq.

California State Bar No. 337395 (admitted 2021)

Education

University of California, Los Angeles School of Law (J.D. 2020)

University of California, San Diego (B.A. 2017)

During law school Mr. Gómez obtained certificates in Teaching Excellence and Curriculum Design from the University of California, Irvine Division of Teaching Excellence and Innovation (2020). Mr. Gómez also obtained a Certificate in Arts Management from University of California, Irvine Paul Merage Business School (2019). Mr. Gómez also received the Masin Family Gold Award for his academic performance at UCLA Law (2018) from the Masin Family Foundation. Mr. Gómez was also the recipient of the American Ballet Theatre's Project Plié Diversity Scholarship (2019), where he worked in-house for the American Ballet Theatre under their general counsel and where he built a workshop for the

American Ballet Theatre's Choreographer Incubator program about intellectual property in dance and copyrighting choreography, which is still being taught today. Mr. Gómez was also the recipient of the UCLA School of Law's President's Public Service Fellowship (2020-2021) while working for the California Lawyers for the Arts, Arts Arbitration and Mediation Services department and Sacramento Mediation Center.

Employment

Attorney, Ferraro Vega Employment Lawyers (2026 - present)

Adjunct Faculty, Thomas Jefferson School of Law (2024 - Present)

Attorney, Wilshire Law Firm (2025 - 2026)

Attorney, Abramson Labor Group (2024 - 2025)

Attorney, Marquee Law Group (2022 - 2024)

Attorney, For Purpose Law Group (2021)

Mr. Gómez began practicing law as a transactional corporate attorney working with tax-exempt organizations. He did everything from formation, gaining state and federal tax-exemption, registrations with the Department of the Attorney General's Registry of Charities and Fundraisers, foreign (out-of-state) registrations, and contract drafting as well as providing employer-side advice and counsel and drafting corporate policies and handbooks to ensure compliance with California and federal labor laws. Mr. Gómez then transitioned into plaintiff-side employment litigation. He has since specialized in settlement approval for class and PAGA representative actions and has been approved in numerous Courts as class and PAGA counsel. He now heads up the Settlement Department at Ferraro Vega to shepherd settled cases through the approval and distribution process. He is also an adjunct faculty at Thomas Jefferson School of Law in San Diego, CA where he has taught Learning Skills, a class designed for incoming law students to learn how to succeed in law school and Contract Drafting. He also serves as a bar prep mentor for graduating students sitting for the California bar exam. He has also guest lectured and held workshops on a variety of legal topics at the University of California, Irvine and other organizations throughout Southern California.

Organizations

Mediator, California Lawyers for the Arts, Arts Arbitration and Mediation Services (2024 - present)

Ricardo De Leon, Esq.

California State Bar No. 365493 (admitted 2025)

Education

University of San Diego School of Law (J.D.)

San Diego State University (B.A.)

During law school, Mr. De Leon gained practical experience in several law clerk positions, including at the USD Immigration Law Clinic, and firms that specialized in advising small

businesses, medical malpractice, and a non-profit focused on legislative reform. Mr. De Leon served on the board of the USD La Raza student organization and as a senior editor for the USD International Law Journal.

Employment

Attorney, Ferraro Vega Employment Lawyers, Inc. (2025 to Present)
Post Bar Law Clerk, Banker's Hill Law Firm A.P.C. (Fall 2025)
Law Clerk, Hegeler & Anderson, A.P.C. (2024 - 2025)
Law Clerk, Pokala Law, A.P.C. (2023 - 2024)
Law Clerk, USD Immigration Law Clinic (Fall 2023)
Law Clerk, Western Center on Law & Poverty (Summer 2023)

Troy Q. Strange, Esq.

California State Bar No. 346637 (admitted 2022)

Education

California Western School of Law (J.D., 2022)
California Polytechnic State University of San Luis Obispo (B.A., 2018)

Mr. Strange is a trial attorney dedicated to advocating for California employees in complex litigation, including Labor Code violations, wage-and-hour disputes, and PAGA representative actions. A first-chair trial lawyer, Mr. Strange possesses a sophisticated litigation background that spans both public enforcement and private defense. He previously served as an attorney for the Department of Industrial Relations, where he prosecuted cases across Southern California , including San Diego, San Bernardino, Riverside, and Imperial Counties. He further refined his expertise at Procopio, Cory, Hargreaves & Savitch LLP, advising employers on statutory compliance and litigating single-plaintiff and class-action matters. He is admitted to practice in the State of California and the U.S. District Court for the Southern District of California.

Affiliations

San Diego County Bar Association

Employment

Attorney, Ferraro Vega Employment Lawyers, Inc. (2026 to Present)
Attorney, Procopio, Cory, Hargreaves & Savitch (2025)
Attorney, California Department of Industrial Relations, Division of Labor Standards Enforcement, (2023-2025)
Attorney, Sayyar Law APC, (2022-2023)
Law Clerk, Law Offices of Benjamin J. Cheeks, (2021-2022)
Law Clerk, GrahamHollis (2021-2022)
Law Clerk, Aguirre and Severson, LLP (2021)
Law Clerk, Alternate Public Defender's Office North County San Diego, (2020)

Andrew Katseanes, Esq.

California State Bar No. 351638 (admitted 2023)

Education

University of San Diego School of Law (J.D.)

Idaho State University (B.S.)

During law school, Mr. Katseanes was an active member of the mock trial team and earned recognition for his pro bono service with the Legal Aid Society of San Diego, where he assisted with unlawful detainers and restraining orders. He began his career working in civil defense before transitioning to plaintiff-side employment law. He is admitted to practice in the State of California and the U.S. District Court for the Southern District of California.

Employment

Attorney, Burger, Meyer, & D'Angelo, LLP (2025-2026)

Attorney, Tyson & Mendez, LLP (2024-2025)

Law Clerk, The Curran Law Firm, APC (2021-2023)

Law Clerk, Office of the Primary Public Defender San Diego, (2021)

Nicolas Ahadzadeh, Esq.

California State Bar No. 365386 (admitted 2025)

Education

California Western School of Law (J.D.)

Grand Canyon University (B.A.)

Certificates

Mediation Clinic Training and Field Experience

During law school, Mr. Ahadzadeh was an active member of student-run organizations, including the Student Bar Association, was invited to the law school's Alternative Dispute Resolution team, earned multiple Distinguished Advocate Awards, and performed volunteer work at multiple legal organizations, including Unlawful Detainer Clinic from Legal Aid Society of San Diego and Small Claims Mediator for the Hall of Justice. He began his career working in civil litigation before committing heavily to plaintiff-side employment law. Specifically, Mr. Ahadzadeh has significant experience litigating both class action lawsuits and advocating for victims of individual FEHA violations. He is admitted to practice in the State of California, the U.S. District Court for the Southern District of California, and the U.S. District Court for the Central District of California.

Employment

Attorney, Ferraro Vega Employment Lawyers, Inc. (2026-Present)

Law Clerk, Hogue & Belong, APC (2021-2024)

Law Clerk, Garcia Hong Law, (2020)
Law Clerk, Mara Law Firm, PC (2020)
Circulation Clerk, California Western School of Law Library (2019-2021)

Organizations

Applicant, Welsh Inn of Court (2026)
San Diego County Bar Association (2019 to Present)
Annual Dinner Committee, Lawyers Club of San Diego (2019-2020)
Student Bar Association, CWSL, *Vice President* (2019-2020)

Publications

Ahadzadeh, Nicolas. "Bridging the Financial Gap from Law School Graduate to Sole Practitioner." American Bar Association. MONEY TALKS: Financial Issues in Law Practice (January February 2022).
Ahadzadeh, Nicolas. "Using Legal Research to Stay Ahead of the Curve." Thomson Reuters. Law School Survival Guide (2021).

Awards

Lawyers of Distinction, "Best of the Best" Nominee (2026).
California Western School of Law, Distinguished Advocate Award, Trial (2020)
California Western School of Law, Distinguished Advocate Award, Trial (2019)
California Western School of Law, Distinguished Advocate Award, Negotiations (2019)

Cesar Yuriar

California State Bar No. ____ (awaiting admission)

Education

University of San Diego, School of Law (J.D.)
University of California, Irvine (B.A.)

Cesar obtained his dual undergraduate degrees from the University of California, Irvine. He went on to earn his J.D. from the University of San Diego, School of Law. During law school, Cesar earned approval to practice California state law as a Certified Law Student and represented a wide variety of clients as part of the Civil Legal Clinic. He was recognized for his oral advocacy skills, having earned "2nd Best Oral Advocate" during the Alumni Torts Moot Court Tournament. Cesar also actively served on the executive boards for USD's International Law Society and La Raza. He is currently awaiting admission to practice law in the State of California.

Employment

Employment Rights Case Analyst, Associate Attorney, Ferraro Vega Employment Lawyers, Inc. (2025-Present)
Senior Legal Analyst, California Department of Justice, Office of the Attorney General (2023-2025)

Data Entry Specialist, Housing Inspector, Process Server, Legal Aid Society of San Diego (2018 - 2022)

Law Writer, The Athanassious Law Office, PC (2017)

Certified Legal Intern, Civil Clinic, University of San Diego, School of Law (2014, 2016)

Judicial Clerk, EEOC (2015)

Law Clerk, Gruenberg Law (2015)

Law Clerk, U.S. Department of Labor (2014)

Ninel Kocharyan, Esq.

California State Bar No. 299939 (admitted 2014)

Education

Thomas Jefferson School of Law (J.D.)

University of California, Los Angeles (B.A.)

Ms. Kocharyan focused on plaintiff-side labor and employment law for most of her legal career. Before joining the firm, Ms. Kocharyan spent five years at a California plaintiff-side law firm, where she was involved in researching, assessing, and filing wage and hour class actions and PAGA matters. While in law school, Ms. Kocharyan interned at an employment law firm representing employees in wrongful termination and discrimination matters.

Employment

Senior Counsel, Ferraro Vega Employment Lawyers, Inc. (2026-Present)

Associate Attorney, Capstone Law APC (2021-2026)

Erin M. O'Leary

Washington State Bar No. 46803 (Admitted 2013)

Education

Seattle University School of Law, Seattle, WA (J.D.) 2013

Carroll College, Helena, MT (B.A. International Business and Finance) 2005

Ms. O'Leary has more than a decade of labor and employment law experience. Before joining Ferraro Vega Employment Lawyers, Ms. O'Leary represented management in labor and employment actions as well as workplace safety. Ms. O'Leary brings extensive experience in complex litigation.

Employment

Senior Counsel, Ferraro Vega Employment Lawyers (2026-present)

Attorney, David Grimm Payne & Marra (2024-2026)

General Counsel, Seattle Plastic Surgery and related entities (2023-2024)

Attorney, DBS Law (2022-2023)

Attorney, Employer Solutions Law (2017-2022)

Attorney, Nadler Law Group (2014-2017)

Theodore R. Braun, Esq.

Washington State Bar No. 64455 (Admitted 2025)

Education

Seattle University School of Law, Seattle, WA (J.D.) 2025

Clarkson University, Potsdam, NY (B.S. Engineering and Management) 2019

Mr. Braun started his career as an inventor trying to create a solution to pediatric vehicular heatstroke after he obtained his dual degree from Clarkson University. He gained his first insights into the legal profession pursuing a patent for his invention and negotiating contracts as the Vice President of Sales for Sector-Five. Before joining Ferraro Vega Employment Lawyers, Mr. Braun worked as a litigation associate representing employees in complex employment litigation involving discrimination, retaliation, wrongful termination, wage and hour violations, and other workplace misconduct.

Employment

Associate Attorney, Ferraro Vega Employment Lawyers (2026-present)

Litigation Associate, Blankenship Law Firm (2025-2026)

Law Clerk, Gauthier & Associates (2023-2025)

Rebecca L. Gil

Washington State Bar (July 2026 examination canceled)

Education

Seattle University School of Law, Seattle, WA (J.D.) 2026

University of Maryland (B.S. Legal Studies) 2017

Ms. Gil's career centers on representing employees in employment litigation involving discrimination, retaliation, wage and hour violations, and workplace rights. Before joining Ferraro Vega Employment Lawyers, Ms. Gil served as a Rule 9 Licensed Legal Intern with the City of Everett Prosecutor's Office, where she gained significant courtroom experience. Prior to that, Ms. Gil spent eight years as a paralegal, gaining experience in employment law through every stage of litigation.

Employment

Rule 9 Licensed Law Clerk, Ferraro Vega Employment Lawyers (2026-present)

Rule 9 Licensed Legal Intern, City of Everett Prosecutor's Office (2025-2026)

Lead Litigation Paralegal, Emery Reddy, PLLC (2019-2025)

Lead Paralegal, Employer Solutions Law, Formerly K-Solutions Law (2017-2019)

Aviation Electronics Technician, U.S. Navy (2013-2017)

Organizations

Justice in Employment and Labor Law, Seattle University School of Law (2024 – 2016)

Awards

Laurel Currie Oates – Awarded for excellence in legal writing, Seattle University School of Law

Lauren Plowy

California State Bar No. (awaiting admission)

Education

University of San Diego School of Law (J.D. 2026)

San Diego State University (B.A. 2021)

During law school, Ms. Plowy gained practical experience in law clerk positions with the USD Women's Law Clinic and Ferraro Vega Employment Lawyers. Ms. Plowy was actively participated in the Appellate Moot Court Board. She received the Best Petitioner Brief Award for the Paul A. McLennon Sr. Honors Moot Court Competition in 2025. Ms. Plowy also earned concentrations in both Employment & Labor Law and Civil Litigation to support her practice focus.

Employment

Law Clerk Awaiting Admission, Ferraro Vega Employment Lawyers, Inc. (2024 to Present)

Law Clerk, USD Women's Law Clinic (Summer 2024)

Awards

Paul A. McLennon Sr. Honors Moot Court Competition – Awarded for Best Petitioner Brief, University of San Diego School of Law (Spring 2025)

CALI Excellence for the Future Awards – Awarded for excellence in Tax I, University of San Diego School of Law (Fall 2025)

OF COUNSEL ATTORNEYS

Rick A. Waltman, Esq.

Rick Waltman Law, APC

California State Bar No. 306463 (admitted 2015)

Education

University of San Diego School of Law (J.D., *cum laude*, *San Diego Law Review*)

University of Minnesota (B.S. Chemistry)

During law school, Mr. Waltman externed for Judge Thomas J. Whelan in the U.S. District Court for the Southern District of California, worked for the California Attorney General's

Office as a clerk, and was a research assistant to Professor Robert Fellmeth, Price Professor of Public Interest Law.

Employment

Of Counsel, Ferraro Vega Employment Lawyers (January 2026 to present)
Attorney and Principal, Rick Waltman Law, APC (October 2020 to present)
Attorney, Buchalter (2018 to 2020)
Attorney, Gordon Rees Scully Mansukhani (2016 to 2018)

Prior to starting with the firm, Mr. Waltman has run his own practice at Rick Waltman Law, APC, worked in the employment law practice groups of Gordon Rees and Buchalter, where he advised companies, drafted employee policies and agreements, and defended employers in class action and PAGA litigation.

Awards

Super Lawyers “Rising Star” in the field of Employment Law and Class Actions (2018 to 2019, 2022-2025)

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)

Isabel Tostado

Paralegal

Employment

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)

Leah Carcione

Paralegal

Employment

Paralegal, Ferraro Vega Employment Lawyers (November 2025 to Present)

Paralegal, Wilshire Law Firm, (May 2024 – October 2025)

Paralegal, The Markham Law Firm, (August 2017 – April 2024)

Education

University of San Diego School of Law, (ABA Paralegal Certificate)

Jennifer Steele

Paralegal

Employment

Paralegal, Ferraro Vega Employment Lawyers (January 2026 to Present)

Paralegal, Hogue and Belong APC, (August 2025 – January 2026)

Education

University of California Los Angeles, (Bachelor of Arts, Sociology)

University of San Diego School of Law, (ABA Paralegal Certificate)

Raquel Gerardo

Paralegal

Employment

Paralegal, Ferraro Vega Employment Lawyers (January 2026 to Present)

Legal Assistant, Mara Law Firm (February 2025 – January 2026)

Education

Brigham Young University- Idaho, (Bachelor of Science, Business Management with an emphasis in Supply Chain)

Leslee Soria Alvarado

Paralegal

Employment

Paralegal, Ferraro Vega Employment Lawyers (January 2026 to Present)

Legal Assistant, Hogue & Belong (July 2025 to January 2026)

Education

University of California, San Diego (Bachelor of Arts, Political Science: Public Law)

Edith Byron

Paralegal

Employment

Paralegal, Ferraro Vega Employment Lawyers, Inc. (June 2026 to Present)

Paralegal, Milligan Family Law, APC (March 2026 – June 2026)

Paralegal, Byron Edwards & Lemley, APC (August 2025 – February 2026)

Paralegal, Aldridge Pite Haan, LLP (January 2025 – August 2025)

Paralegal, W Law, Inc. (June 2023 – December 2025)

Paralegal Manager, Patenaude & Felix, APC (July 2021 – June 2023)

Receptionist/Legal Secretary, Slovinsky and Slovinsky Law Office (July 2020 – May 2021)

Education

Southwestern College (*Associate in Science: Paralegal Studies*)

Sarah Debolt

Paralegal

Employment

Paralegal, Ferraro Vega Employment Lawyers, Inc. (June 2026 to Present)

Case Manager, Jurewitz Law Group (May 2025-June 2026)

Legal Assistant, Dolce Panepinto, P.C. (February 2022-April 2025)

Education

Hilbert College (Bachelor of Science, Forensic Science, Laboratory Sciences)

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)

Mariela R. Romo, Esq.

University of San Diego School of Law (J.D.)

University of California, Santa Barbara (B.A. Political Science)

Xavier L. Woodford, Esq.

Thomas Jefferson School of Law (J.D.)

Rutgers University – New Brunswick (B.A.)

Elyssa Martinez, Esq.

University of San Diego School of Law (J.D.)

Grand Canyon University (B.A.)

CLASS & REPRESENTATIVE ACTIONS

Kevin Clemente, et al. v. Oremor Automotive Group LLC, et al., San Diego County Sup. Ct. Case No. 37-2024-00019752-CU-OE-CTL (Hon. Michael D. Washington) (September 4, 2026)

Lance Tyler Dunn, et al. v. Railpros Field Services, Inc., San Diego County Sup. Ct. Case No. 24CU022030C (Hon. Blaine K. Bowman) (August 21, 2026)

Fernanda Benevides v. S.I. Management, LLC, et al., Orange County Sup. Ct. Case No. 30-2024-01400577-CU-OE-CXC (Hon. Layne H. Melzer) (August 18, 2026)

Isabella Serrano v. SoCal Cookies San Diego, LLC, San Diego County Sup. Ct. Case No. 25CU020561C (Hon. Michael D. Washington) (August 14, 2026)

Jack Barnes v. California Center for the Arts Escondido, Foundation, San Diego County Sup. Ct. Case No. 37-2024-00021057-CU-OE-CTL (Hon. Carolyn Caietti) (August 14, 2026)

Bebe Ibvisayi Lashley v. Robbins Research International, Inc., San Diego County Sup. Ct. Case No. 25CU007101C (Hon. Michael D. Washington) (August 14, 2026)

Jennifer Espinoza Corea v. Intermountain Management, L.L.C., et al., San Diego County Sup. Ct. Case No. 24CU004106C (Hon. Gregory W. Pollack) (August 7, 2026)

Nathan Perez v. Waterco of the Central States, Inc., et al., San Diego County Sup. Ct. Case No. 25CU026729C (Hon. Gregory W. Pollack) (July 30, 2026)

Jongbyuk Kim v. Kru Partners, LLC DBA Kru Contemporary Japanese Cuisine, Sacramento County Sup. Ct. Case No. 24CV015292 (Hon. Jill H. Talley) (July 29, 2026)

Edith Martinez, et al. v. American Innotek, Inc., San Diego County Sup. Ct. Case No. 25CU002442C (Hon. Matthew C. Branner) (July 24, 2026)

Sabrina Walker v. Somagen Healthcare III, Inc., San Diego County Sup. Ct. Case No. 24CU003757C (Hon. Loren Freestone) (July 17, 2026)

Mauricio Torres v. Macro Pro, Inc., San Diego County Sup. Ct. Case No. 37-2024-00025803-CU-OE-CTL (Hon. Loren Freestone) (July 17, 2026)

Daniely Magana Rubio v. Pinnacle International Development, Inc., San Diego County Sup. Ct. Case No. 24CL001089C (Hon. Wendy M. Behan) (July 17, 2026)

Luis Cruz v. Quantix SCS, LLC, San Diego County Sup. Ct. Case No. 24CU021959C (Hon. Blaine K. Bowman) (July 17, 2026)

Luis Luna v. K Motors 2, Inc., San Diego County Sup. Ct. Case No. 25CU030754C (Hon. Carolyn M. Caietti) (July 16, 2026)

Anthony Williams, et al. v. Davidson Hotel Company, LLC, Spokane County Sup. Ct. Case No. 25-2-00229-32 (Hon. Candie M. Dibble) (July 9, 2026)

Eileen Seffron, et al. v. SIR Fitness Holdings, LLC, San Diego County Sup. Ct. Case No. 37-2023-00040619-CU-OE-CTL (Hon. Evan P. Kirvin) (July 8, 2026)

David Edwards v. American Electric, Inc., Benton County Sup. Ct. Case No. 25-2-00362-03 (Hon. Bronson Brown) (June 26, 2026)

John Brayall v. Castleworks Home Services Company, et al., San Diego County Sup. Ct. Case No. 37-2023-00021278-CU-OE-CTL (Hon. Matthew C. Braner) (June 26, 2026)

Rene Cabrera, et al. v. Umansky Automotive Group, et al., Alameda County Sup. Ct. Case No. 24CV070868 (Hon. Patrick McKinney) (June 24, 2026)

Epitacio Leon v. Builders Fence Company, Inc., San Diego County Sup. Ct. Case No. 24CU016452C (Hon. Wendy M. Behan) (June 23, 2026)

Adrian Morales, et al. v. Tom Malloy Corporation, San Diego County Sup. Ct. Case No. 25CU042653C (Hon. Michael D. Washington) (June 18, 2026)

Justin Romprey v. Hearx West LLC DBA Hearusa, San Diego County Sup. Ct. Case No. 24CU025143C (Hon. Judy S. Bae) (June 17, 2026)

Alexa Britt v. San Diego Hotel Company LLC, San Diego County Sup. Ct. Case No. 24CU012268C (Hon. Judy S. Bae) (June 5, 2026)

Kazzandra Montoya v. Child Development Associates Incorporated, San Diego County Sup. Ct. Case No. 37-2024-00029581-CU-OE-CTL (Hon. Loren Freestone) (June 5, 2026)

Melissa Pope, et al. v. AGI Post, Inc., et al., San Diego County Sup. Ct. Case No. 24CU005384C (Hon. Loren Freestone) (May 18, 2026)

Napoleon Wilson v. Sullivan Properties Inc. DBA Fairgrove Property Management, San Diego County Sup. Ct. Case No. 24CL013656C (Hon. Michael T. Smyth) (May 13, 2026)

Carlos Amador Perez v. Children's Paradise, Inc., San Diego County Sup. Ct. Case No. 24CU007810C (Hon. Matthew C. Braner) (May 6, 2026)

Daisy Macias, et al. v. Planned Parenthood of the Pacific Southwest, San Diego County Sup. Ct. Case No. 25CU025541C (Hon. Michael T. Smyth) (May 5, 2026)

Eneil Stone v. International Building Materials, LLC, Thurston County Sup. Ct. Case No. 24-2-03195-34 (Hon. Chris Lanese) (May 1, 2026)

Daniel Fabian v. Dealer Tire LLC, San Diego County Sup. Ct. Case No. 37-2023-00052611-CU-OE-CTL (Hon. Wendy M. Behan) (May 1, 2026)

Filbert Namu v. All-Pro Bail Bonds Inc., San Diego County Sup. Ct. Case No. 25CU039133C (Hon. Gregory W. Pollack) (May 1, 2026)

Amos Maldonado v. Funko LLC, San Diego County Sup. Ct. Case No. 37-2024-00017602-CU-OE-CTL (Hon. Marcella O. McLaughlin) (May 1, 2026)

Franco Masada v. Ferry International LLC, San Diego County Sup. Ct. Case No. 24CU009941C (Hon. Katherine A. Bacal) (May 1, 2026)

Carmina Torres v. First Meridian Home Care Services, Inc. DBA Meridian Home Care LLC, San Diego County Sup. Ct. Case No. 24CU016862C (Hon. Carolyn M. Caietti) (April 29, 2026)

Christopher Coney v. DMSI Staffing LLC, et al., San Diego County Sup. Ct. Case No. 25CU011805C (Hon. Michael D. Washington) (April 24, 2026)

Randi Sycks v. Incyte Pathology, Inc., Spokane County Sup. Ct. Case No. 24-2-02294-32 (Hon. Breean Beggs) (April 23, 2026)

Michael E. Osley, Jr. v. Bandon Fitness [Texas], Inc., San Diego County Sup. Ct. Case No. 37-2024-00011471-CU-OE-CTL (Hon. Evan P. Kirvin) (April 21, 2026)

Maria Fuoco v. TDIC Insurance Solutions, Sacramento County Sup. Ct. Case No. 24CV025040 (Hon. Lauri A. Damrell) (April 17, 2026)

Glory Orekoya v. Inspyr Solutions LLC, et al., Alameda County Sup. Ct. Case No. 24CV085153 (Hon. S. Raj Chatterjee) (April 14, 2026)

Daniel Munoz v. ARS REI USA Corp., San Diego County Sup. Ct. Case No. 24CU013657C (Hon. Blaine K. Bowman) (April 3, 2026)

Martin Aldrete, et al. v. JAL Equity Corp. DBA Marketing.com, et al., San Diego County Sup. Ct. Case No. 24CU003448C (Hon. Wendy M. Behan) (April 3, 2026)

Mason Griffin v. JKB Financial, Inc., San Diego County Sup. Ct. Case No. 25CU017449C (Hon. Evan P. Kirvin) (April 1, 2026)

Charles Madrid v. Grand America Hotels & Resorts, Inc., et al., San Diego County Sup. Ct. Case No. 37-2024-00023471-CU-OE-CTL (Hon. Blaine K. Bowman) (March 27, 2026)

Salvador Cruz v. Khanna Enterprises VI LP, et al., San Diego County Sup. Ct. Case No. 25CU014533C (Hon. Loren Freestone) (March 13, 2026)

Zachary Lacono v. CC of San Diego, Inc., et al., San Diego County Sup. Ct. Case No. 37-2024-00029215-CU-OE-CTL (Hon. Marcella O. McLaughlin) (March 6, 2026)

Eloina Vigil v. SLH Escondido Manager, LLC, San Diego County Sup. Ct. Case No. 37-2024-00013517-CU-OE-CTL (Hon. Loren Freestone) (March 5, 2026)

Matthew Falcosky v. Consolidated Electrical Distributors, Inc., King County Sup. Ct. Case No. 24-2-29691-3 (Hon. Suzanne Parisien) (February 27, 2026)

Carlos Marquez, et al. v. Naval Engineering Support Inc., San Diego County Sup. Ct. Case No. 37-2024-00023814-CU-OE-CTL (Hon. Katherine A. Bacal) (February 20, 2026)

Darby Churchill, et al. v. Interim Healthcare San Diego LLC, et al., San Diego County Sup. Ct. Case No. 37-2023-00032762-CU-OE-CTL (Hon. Evan P. Kirvin) (February 6, 2026)

Abraham Iriarte v. KFM Restaurants LP, San Diego County Sup. Ct. Case No. 24CU019915C (Hon. Gregory W. Pollack) (February 6, 2026)

Shawntay Ellison v. CHW Entertainment, Inc., San Diego County Sup. Ct. Case No. 37-2024-00020465-CU-OE-CTL (Hon. Loren Freestone) (February 6, 2026)

Charles Constantino v. Good Samaritan Shelter, Santa Barbara County Sup. Ct. Case No. 24CV04221 (Hon. James F. Rigali) (February 3, 2026)

Monica Velarde v. San Diego Imaging Management, Inc., et al., San Diego County Sup. Ct. Case No. 37-2024-00030937-CU-OE-CTL (Hon. Gregory W. Pollack) (January 30, 2026)

Emilie Hanne v. Unio Health Partners LLC, San Diego County Sup. Ct. Case No. 37-2024-00019901-CU-OE-CTL (Hon. Euketa Oliver) (January 23, 2026)

Nieemah Jenkins v. ArcherAviation Operating Corp., et al., Alameda County Sup. Ct. Case No. 24CV086806 (Hon. Rebekah Evenson) (January 22, 2026)

Jose Martinez v. HES Commercial, Inc., et al., San Diego County Sup. Ct. Case No. 24CU000888C (Hon. Evan P. Kirvin) (January 21, 2026)

Neyly Becerra v. St. Madeleine Sophie's Center, San Diego County Sup. Ct. Case No. 37-2024-00007254-CU-OE-CTL (Hon. Matthew C. Braner) (January 16, 2026)

James Woodruff v. Ormat Technologies, Inc., Imperial County Sup. Ct. Case No. ECU003647 (Hon. L. Brooks Anderholt) (January 15, 2026)

Sayprasith Phahongchanh v. Columbia Machine, Inc., Clark County Sup. Ct. Case No. 24-2-03542-06 (Hon. Gregory M. Gonzales) (January 14, 2026)

Zion Jackson v. Loyola Marymount University, Los Angeles County Sup. Ct. Case No. 24STCV14085 (Hon. Laura A. Seigle) (January 12, 2026)

Brian Harris, et al. v. Securespace Management, LLC, San Diego County Sup. Ct. Case No. 37-2024-00023760-CU-OE-CTL (Hon. Wendy M. Behan) (January 9, 2026)

Marcelina Pereyra, et al. v. GAT Airline Ground Support Inc., San Diego County Sup. Ct. Case No. 37-2024-00000064-CU-OE-CTL (Hon. Carolyn Caietti) (January 9, 2026)

Maria Bermudez, et al. v. Lendmark Financial Services LLC, San Diego County Sup. Ct. Case No. 24CU013255C (Hon. Euketa Oliver) (January 9, 2026)

Loomer, et al. v. Vaagen Bros Lumber, Inc., United States District Court, Eastern District of Washington, Case No. 2 :24-cv-0206-TOR (Hon. Thomas O. Rice) (December 10, 2025)

Hung Nguyen v. DUAL North America, Inc., et al., San Diego County Sup. Ct. Case No. 37-2024-00023462-CU-OE-CTL (Hon. James Mangione) (December 5, 2025)

Marie Macias v. Patterson Dental Supply, Inc., et al., San Diego County Sup. Ct. Case No. 37-2024-00016055-CU-OE-CTL (Hon. Marcella O. McLaughlin) (December 5, 2025)

Robert Frosio v. La Jolla Beach and Tennis Club Partners L.P., et al., San Diego County Sup. Ct. Case No. 24CU003072C (Hon. James Mangione) (November 26, 2025)

Dustin Bottomley, et al. v. Six Maritime, Inc., San Diego County Sup. Ct. Case No. 37-2024-00018510-CU-OE-CTL (Hon. Marcela O. McLaughlin) (November 21, 2025)

Arik Papa v. Geocon, Inc., San Diego County Sup. Ct. Case No. 37-2024-00029093-CU-OE-CTL (Hon. Wendy M. Behan) (November 14, 2025)

Maria Cisneros v. ISL Employees, Inc. dba Integral Senior Living, et al., San Diego County Sup. Ct. Case No. 37-2024-00009110-CU-OE-NC (Hon. Michael D. Washington) (November 14, 2025)

Tonya Miller v. Cascadia Senior Living, LLC, Pierce County Sup. Ct. Case No. 23-2-11217-8 (Hon. Angelica Williams) (November 14, 2025)

Myrella Thomas, et al. v. ACES 2020 I, LLC, et al., Alameda County Sup. Ct. Case No. 24CV061880 (Hon. Somnath Raj Chatterjee) (November 4, 2025)

Renee Davin, et al. v. Rock Basin LLC, San Diego County Sup. Ct. Case No. 37-2023-00038275-CU-OE-CTL (Hon. Wendy M. Behan) (October 31, 2025)

Anton Louis Thompson v. Career Systems Development Corporation, et al., Sacramento County Sup. Ct. Case No. 24CV009265 (Hon. Jill H. Talley) (October 28, 2025)

Victor Fragosa, et al. v. Sudberry Properties, Inc., et al., San Diego County Sup. Ct. Case No. 37-2024-00010679-CU-OE-CTL (Hon. Matthew C. Braner) (October 24, 2025)

Irianny Ibarra v. Institutes of Health, LLC, et al., San Diego County Sup. Ct. Case No. 24CU008055C (Hon. Blaine K. Bowman) (October 10, 2025)

Martha Brito v. Ready America, Inc., et al., San Diego County Sup. Ct. Case No. 37-2024-00016167-CU-OE-CTL (Hon. Wendy M. Behan) (October 2, 2025)

Samantha Mendez, et al. v. AE Retail West LLC, et al., San Diego County Sup. Ct. Case No. 37-2023-00014789-CU-OE-CTL (Hon. Judy S. Bae) (September 25, 2025)

Nick De Vera, et al. v. Leica Biosystems Imaging, Inc., et al., San Diego County Sup. Ct. Case No. 37-2023-00035127-CU-OE-CTL (Hon. Gregory W. Pollack) (September 12, 2025)

Ray Dyer v. Kenny Brothers, Inc., et al., San Diego County Sup. Ct. Case No. 37-2023-00045013-CU-OE-CTL (Hon. Gregory W. Pollack) (September 12, 2025)

Maria Galecio-Cruz v. Southern California Specialty Care, LLC, et al., San Diego County Sup. Ct. Case No. 37-2023-00009287-CU-OE-CTL (Hon. Judy S. Bae) (September 5, 2025)

Onoray Davis Jr., et al. v. AllSafe Services, Inc., et al., San Diego County Sup. Ct. Case No. 37-2023-00054447-CU-OE-CTL (Hon. Wendy M. Behan) (August 22, 2025)

Ashley Garcia v. Coastal Clinical & Management Services, Inc. et al., San Diego County Sup. Ct. Case No. 37-2024-00016933-CU-OE-CTL (Hon. Wendy M. Behan) (August 22, 2025)

Alejandro Esparza v. Otay Mesa Sales, Inc., et al., San Diego County Sup. Ct. Case No. 37-2023-00014957-CU-OE-CTL (Hon. Richard S. Whitney) (August 20, 2025)

Shamonique Lashawn Malone-Boyd v. NuCO2 Management LLC, et al., San Diego County Sup. Ct. Case No. 37-2023-00043224-CU-OE-CTL (Hon. Katherine A. Bacal) (August 8, 2025)

Maria Ramirez Tapia v. NakedMD Inc., San Diego County Sup. Ct. Case No. 24CL003956C (Hon. Loren Freestone) (August 7, 2025)

Sierra Pullum v. Arizona Leather Company, Inc., San Diego County Sup. Ct. Case No. 37-2023-00038544-CU-OE-CTL (Hon. Wendy M. Behan) (August 1, 2025)

Keri Park v. EcoATM, LLC, San Diego County Sup. Ct. Case No. 37-2023-00021318-CU-OE-CTL (Hon. Wendy M. Behan) (August 1, 2025)

Linda Davis, et al. v. Sun Pacific Energy, Inc., King County Sup. Ct. Case No. 24-2-04616-0 SEA (Hon. Todd D. Tinker) (August 1, 2025)

Joseph Lagasse v. Alta Pest Control LLC, King County Sup. Ct. Case No. 24-2-10137-3 SEA (Hon. Kristin Ballinger) (July 18, 2025)

Michael Bradley v. The Crack Shack Enterprises, LLC et al., San Diego County Sup. Ct. Case No. 24CL000768C (Hon. Blaine K. Bowman) (July 16, 2025)

Troy Long, et al. v. Vicar Operating Inc., San Diego County Sup. Ct. Case No. 37-2023-00031023-CU-OE-CTL (Hon. Wendy M. Behan) (July 11, 2025)

Noa Olvera v. American Recycling International Inc., San Diego County Sup. Ct. Case No. 37-2024-00027297-CU-OE-CTL (Hon. Joel R. Wohlfeil) (July 11, 2025)

Alejandra Gamino v. Nishiki Diner USA, Inc., et al., San Diego County Sup. Ct. Case No. 24CU000269C (Hon. Marcella O. McLaughlin) (June 26, 2025)

Paul Shelford v. Atlantic Aviation FBO Inc., et al., San Diego County Sup. Ct. Case No. 37-2023-00033584-CU-OE-CTL (Hon. Carolyn Caietti) (May 23, 2025)

Nathaneal Taylor, et al. v. Hallcon Corporation, et al., San Diego County Sup. Ct. Case No. 37-2023-00021029-CU-OE-CTL (Hon. Carolyn Caietti) (May 23, 2025)

Katherine Wishnick v. Big Daddy's Oil 22, Inc., et al., San Diego County Sup. Ct. Case No. 37-2023-00001414-CU-OE-CTL (Hon. Judy S. Bae) (May 23, 2025)

Natalie DiTerlizzi v. V Shred, LLC, et al., San Diego County Sup. Ct. Case No. 37-2023-00023334-CU-OE-CTL (Hon. Marcella O. McLaughlin) (May 16, 2025)

Yvonne Gonzalez, et al. v. West Marine Products, Inc., et al., San Diego County Sup. Ct. Case No. 37-2023-00017462-CU-OE-CTL (Hon. Blaine K. Bowman) (May 9, 2025)

Kandace Battle, et al. v. California Clinic Management, LLC, et al., San Diego County Sup. Ct. Case No. 37-2023-00039498-CU-OE-CTL (Hon. Loren G. Freestone) (May 9, 2025)

Rosa Yareli Figueroa v. Biolife Plasma Services L.P., et al., San Diego County Sup. Ct. Case No. 37-2023-00032681-CU-OE-CTL (Hon. Katherine Bacal) (May 2, 2025)

Jailene Martinez v. Soapy Joe's Group, Inc., et al., San Diego County Sup. Ct. Case No. 37-2023-00053126-CU-OE-CTL (Hon. Gregory W. Pollack) (April 18, 2025)

Sepher Flores, et al. v. U Gym, LLC, et al., San Diego County Sup. Ct. Case No. 37-2023-000539848-CU-OE-CTL (Hon. Joel R. Wohlfeil) (April 18, 2025)

Nataly Gomez v. Pie Venture, LLC, et al., San Diego County Sup. Ct. Case No. 37-2022-00002648-CU-OE-CTL (Hon. Gregory W. Pollack) (April 18, 2025)

Kody Hornburg, et al. v. Pacifica Companies, LLC, et al., San Diego County Sup. Ct. Case No. 37-2023-00002433-CU-OE-CTL (Hon. Wendy H. Behan) (April 17, 2025)

Raul Gonzalez v. Simon Management Associates, LLC, et al., San Diego County Sup. Ct. Case No. 37-2023-00036919-CU-OE-CTL (Hon. James A. Mangione) (March 21, 2025)

Caitlin Ortiz v. AssuredPartners of California Insurance Services LLC, et al., San Diego County Sup. Ct. Case No. 37-2023-00043182-CU-OE-CTL (Hon. James A. Mangione) (March 21, 2025)

Erica Jones v. Bay City Equipment Industries, Inc., et al., San Diego County 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 County 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 County 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 County 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 County 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 County Sup. Ct. Case No. CIVSB2205903 (Hon. Christian Towns) (February 6, 2025)

Lisset Tredo v. Ademco Inc., et al., San Diego County 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 County 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 County 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 County 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 County Sup. Ct. Case No. CIVSB2307814 (Hon. Christian Towns) (January 6, 2025)

Jaime De La O v. Scout Distribution LLC, et al., San Diego County 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 County 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 County 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 County 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 County 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 County 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 County 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 County 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 County 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 County 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 County 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 County 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 County 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 County 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 County 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 County 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 County 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 County 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 County 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 County 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 County 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 County 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 County Sup. Ct. Case No. 37-2022-00022203-CU-OE-CTL (Hon. Richard S. Whitney) (June 24, 2024)

Jerardo Villa v. Investment Concepts, Inc., Ventura County 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 County 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 County 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 County 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 County 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 County 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 County 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 County 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 County 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 County 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 County 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 County 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 County 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 County Sup. Ct. Case No. 37-2022-00018968-CU-OE-CTL (Hon. Gregory W. Pollack) (March 8, 2024)

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

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

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

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

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

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

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

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

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

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

Reyes v. Parkside Lending, LLC, San Diego County 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 County Sup. Ct. Case No. 37-2021-00053035-CU-OE-CTL (Hon. Carolyn M. Caietti) (April 14, 2023)

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

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

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

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

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

Ramirez v. Towne Park, LLC, San Diego County Sup. Ct., No. 37-2020-00003942-CU-OE-CTL (Hon. Katherine A. Bacal) (February 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) (January 28, 2022)

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

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

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

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

Sanchez, et al. v. Lodi Memorial Hospital Association, San Joaquin County Sup. Ct., No. STK-CV-UEO-2019-09557 (Hon. Roger Ross) (December 11, 2020)

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

EXHIBIT 2

LAFFEY MATRIX

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

			Years Out of Law School *				
Year	Adjustmt Factor**	Paralegal/ Law Clerk	1-3	4-7	8-10	11-19	20 +
6/01/25- 5/31/26	1.075336	\$277	\$508	\$625	\$902	\$1,019	\$1,227
6/01/24- 5/31/25	1.080182	\$258	\$473	\$581	\$839	\$948	\$1,141
6/01/23- 5/31/24	1.059295	\$239	\$437	\$538	\$777	\$878	\$1,057
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)

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

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

EXHIBIT 3

2025 EDITION

Hourly Rates in Am Law 100[®] Firms:

**Increases and
Key Drivers**

Table of Contents



Introduction	3
Methodology	4
Rate Increases	5
The Key Drivers of Rates.....	6
Firm Ranking.....	7
Practice Area.....	8
Geography.....	9
Resourcing Mix.....	10
Emerging Trends: AI’s Impact on Law Firm Rates	11
Recommendations	13
Closing	14
About Brightflag	15
About the Authors	15

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

Introduction

Outside counsel rate increases continue to be an anxiety-inducing year-end ritual. While these conversations are inevitable, having the data you need to best negotiate and strengthen relationships with your outside counsel is critical.

Our analysis of 2025 rates shows that, while the pace of growth has slowed from last year's historic surge, firms continue to request and realize substantial year-over-year increases. This translates into continued upward pressure on outside counsel spend.

This year's report provides updated benchmarks on timekeeper rates across Am Law® 100 firms and examines the drivers that most influence those rates: firm ranking, practice area, geography, and resourcing. Armed with these insights, in-house teams can engage in more informed rate negotiations, design smarter resourcing strategies, and ensure their budgets deliver maximum value.

In addition, we've included a special section on how law firms are beginning to integrate artificial intelligence into their operations—and the potential implications for resourcing and pricing models in the years ahead.



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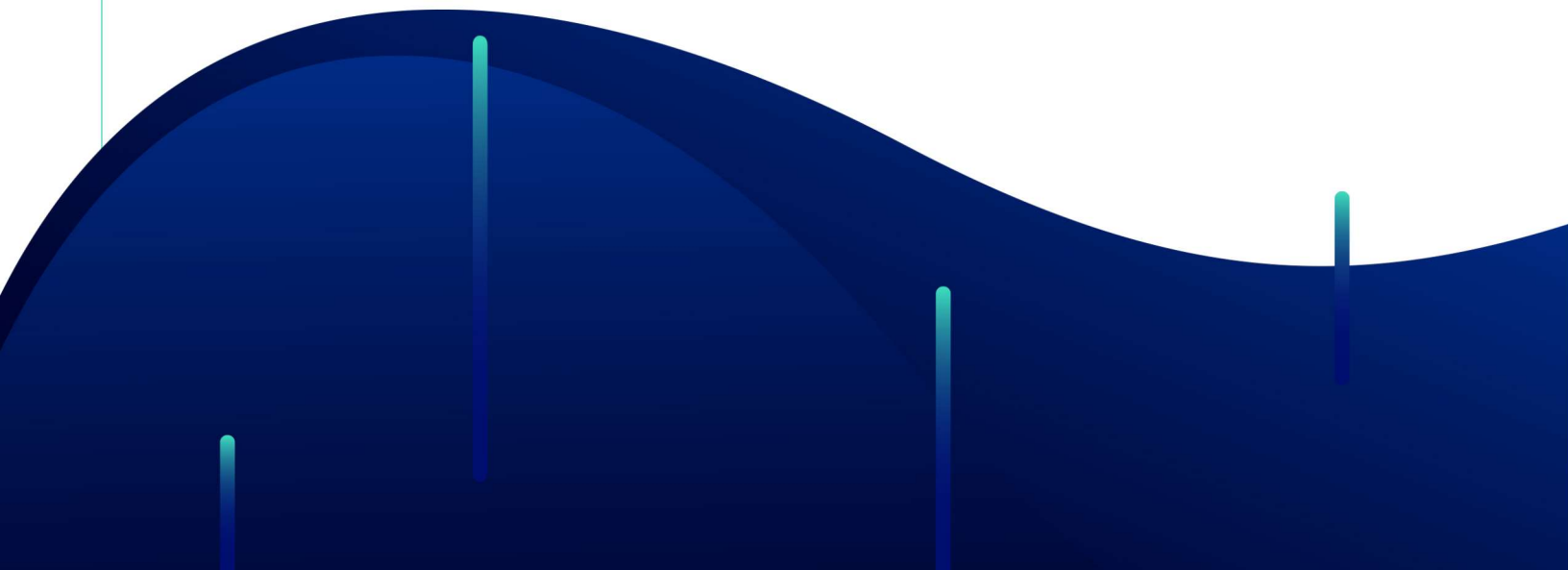
Methodology



This report analyzes billed rates from the Am Law® 100 — the 100 highest-revenue U.S. law firms, as ranked by ALM.¹ Brightflag's dataset reflects billions of dollars in annual outside counsel spend.

For the 2025 analysis, billed rates from January 1 through June 30, 2025 were included. For other years, full-year data were used. All figures are based on billed rates (the actual rates invoiced by firms), rather than rack rates or requested increases, providing an accurate reflection of what in-house teams are paying.

¹ ALM Global Properties, LLC is the owner of U.S. Trademark Registration No. 2313571 for the mark "THE Am Law® 100".

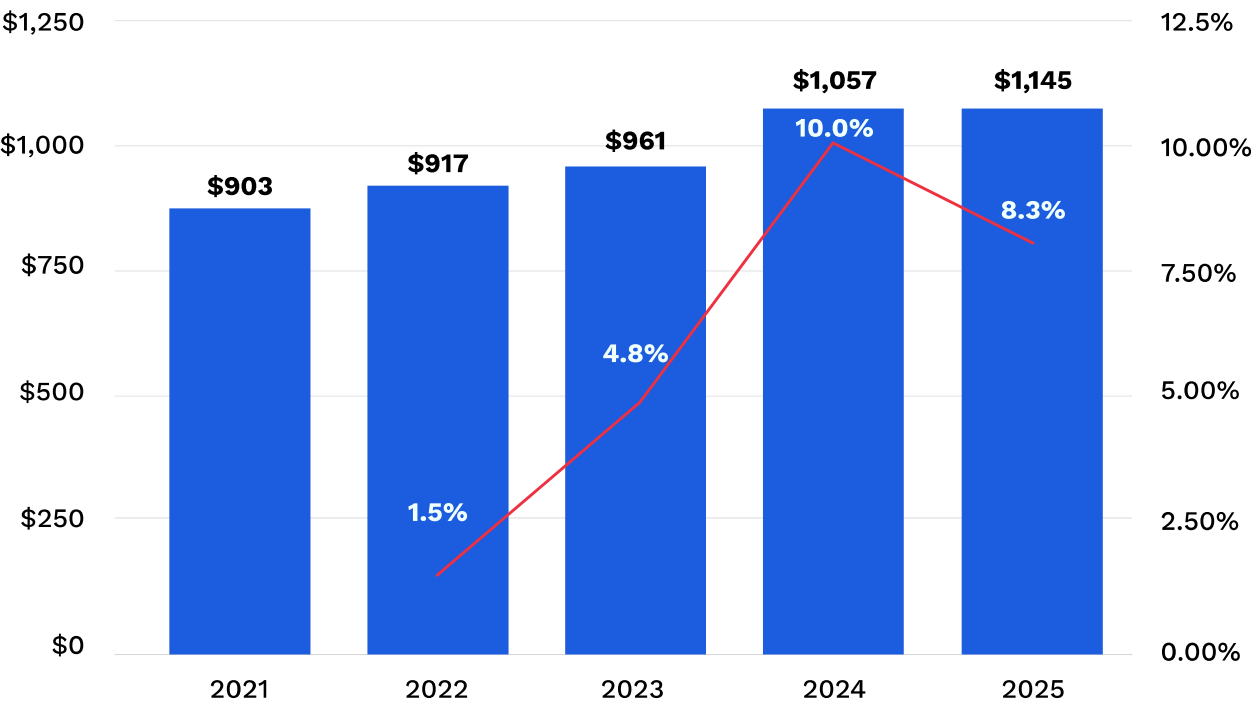


Rate Increases

The blended hourly rate among the Am Law® 100 rose by 8.3% in 2025, reaching \$1,145 per hour.

While this increase is lower than 2024’s historic 10% jump, it remains nearly double the growth of 2023 (4.8%).

Change in Blended Rates in Top 100 Firms ■ Blended Rate — Year-over-year Change



These figures underscore a clear trend: even as inflation moderates, firms continue to push through rate increases at levels that outpace broader economic conditions.

The Key Drivers of Rates

Annual rate increases place continued pressure on legal budgets, and it can feel as though in-house teams have little choice but to accept them. In reality, legal departments do have levers to pull — starting with decisions about which outside counsel firms to engage and how matters are resourced.

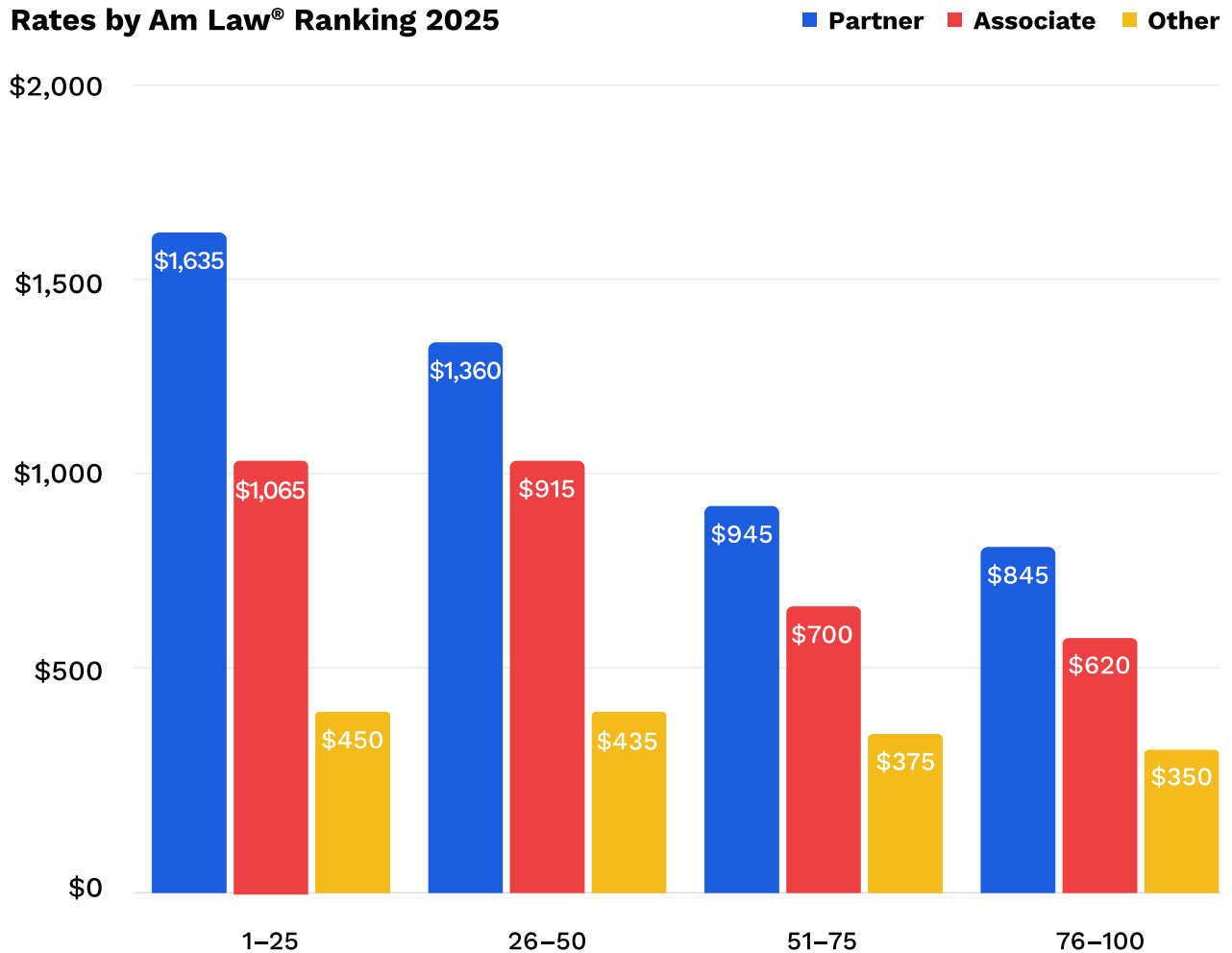
The data shows that firm ranking, practice area, geography, and resourcing all play a role in determining costs. By taking these drivers into account, in-house teams can benefit from the expertise and trust they've built with existing outside counsel where it matters, while also identifying opportunities to stretch their budgets further.

In the following sections, we explore each of these drivers and share insights to help legal departments make informed, cost-conscious decisions regarding which outside counsel firms to engage and how matters are resourced.

Firm Size

Firm ranking remains one of the strongest predictors of hourly rates. In 2025, partners at the top 25 firms charged an average of **\$1,635 per hour**, nearly double the **\$845 average at firms ranked 76–100**. Associates at top 25 firms billed **\$1,065 per hour**, outpacing partner rates at the bottom half of the list.

Rates by Am Law® Ranking 2025



This data highlights the premium commanded by top-ranked firms and the potential savings available by reallocating lower-risk or routine work to smaller firms, even within the Am Law® 100.

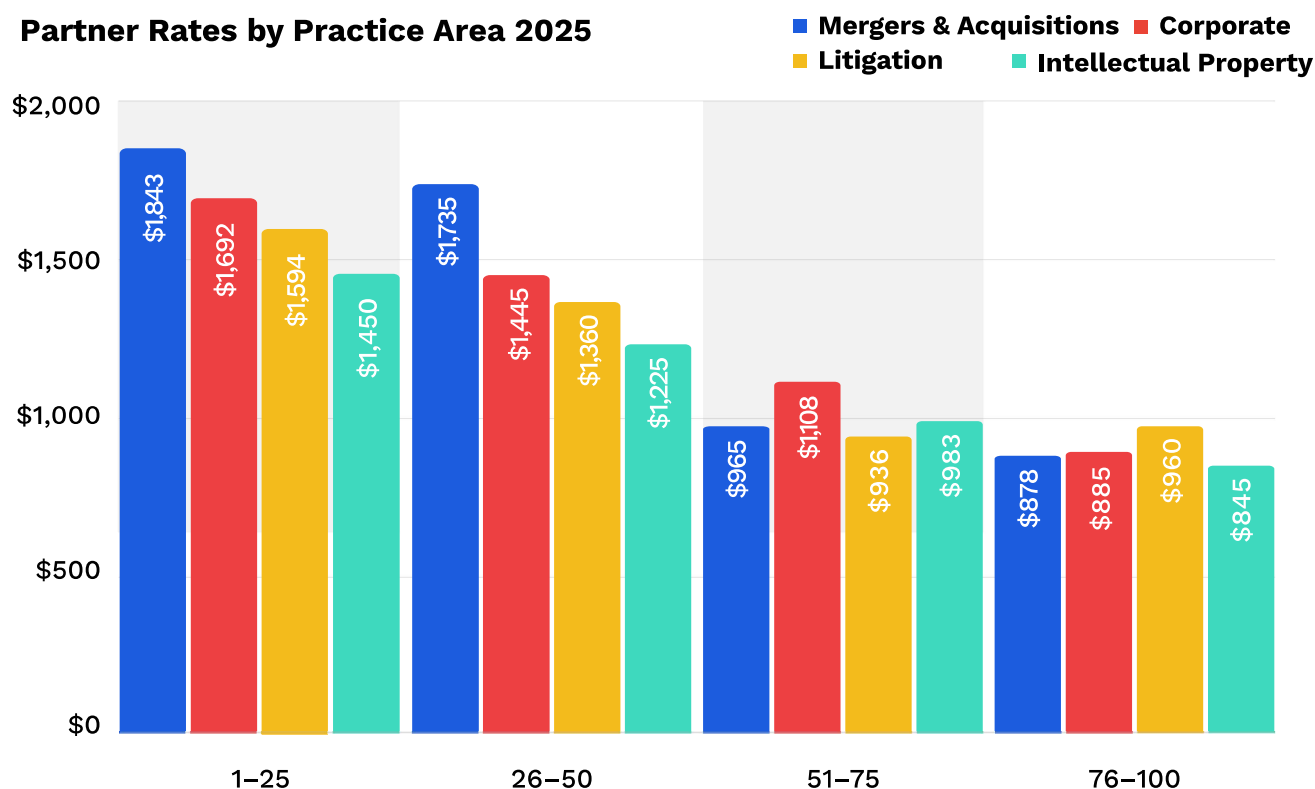
Practice Area

M&A and corporate work remain the highest-priced practice areas. In 2025, M&A partners at top-25 firms billed **\$1,843 per hour**, a **9.7% increase from 2024**, while corporate partners followed at **\$1,692 per hour**, up **8.1% year-over-year**.

Litigation rates also remain elevated, averaging **\$1,594** at top-25 firms and **\$1,360** at firms ranked 26–50, while partners in lower tiers billed under **\$1,000**.

While practice area sets the baseline for rates, in-house teams still have meaningful opportunities to influence cost — particularly in their choice of firm ranking, the staffing mix applied to matters, and, where appropriate, the use of ALSPs for repeatable work like document review.

Partner Rates by Practice Area 2025

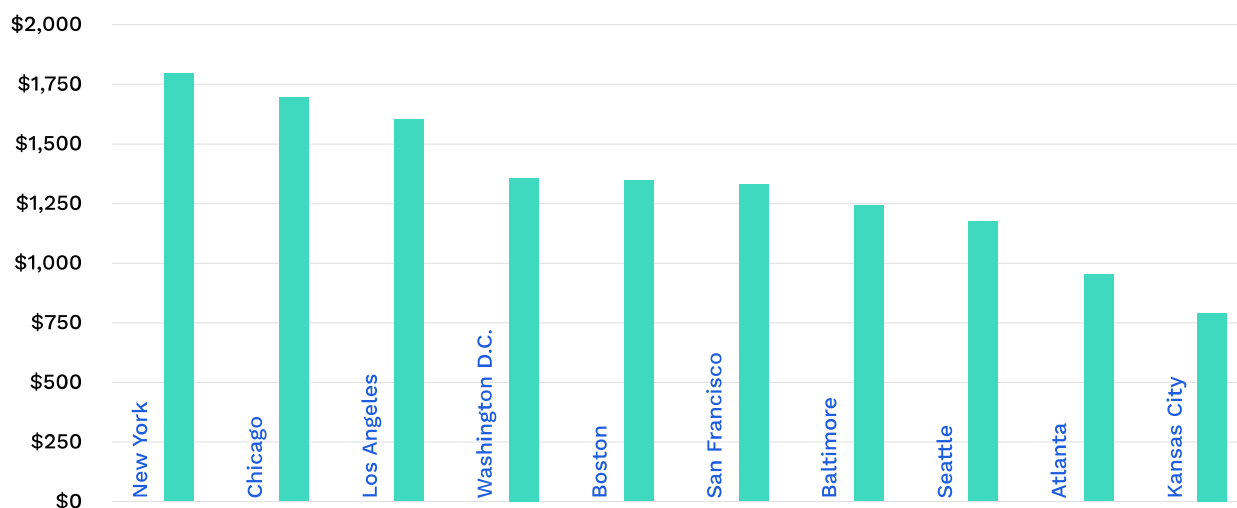
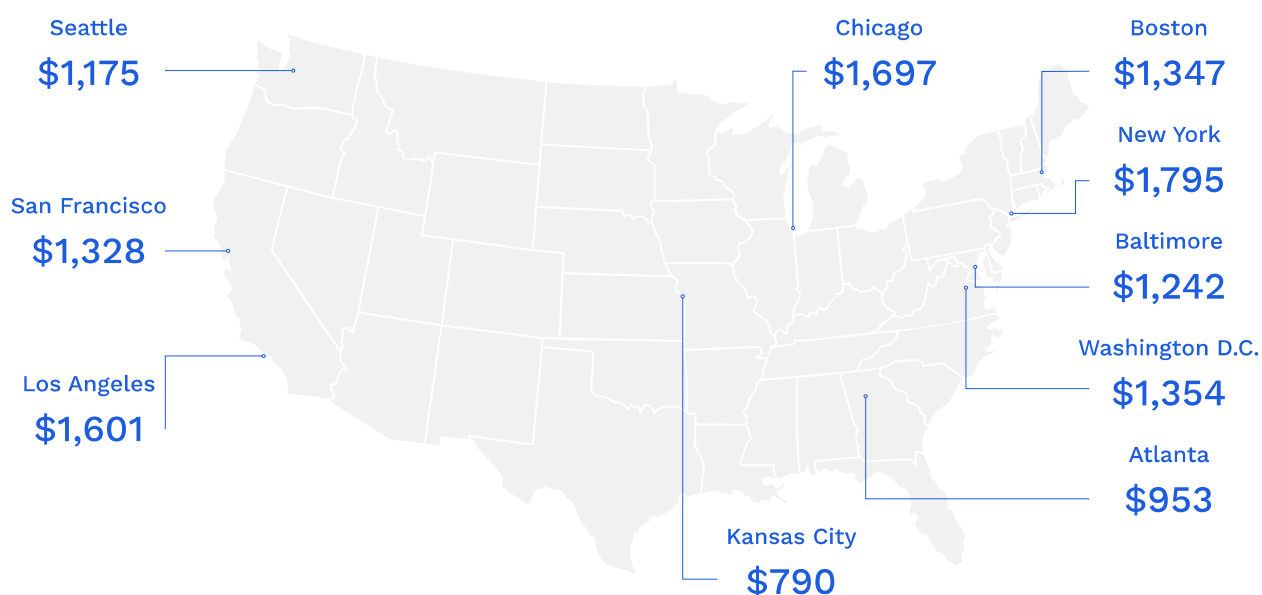


Geography

Rates continue to vary significantly by location. New York remains the most expensive market, with partners billing \$1,795 per hour. Chicago (\$1,697) and Los Angeles (\$1,318) followed closely.

In contrast, partners in Kansas City (\$790) billed at less than half the New York rate. Even within the Am Law® 100, geographic differences create meaningful opportunities for cost savings.

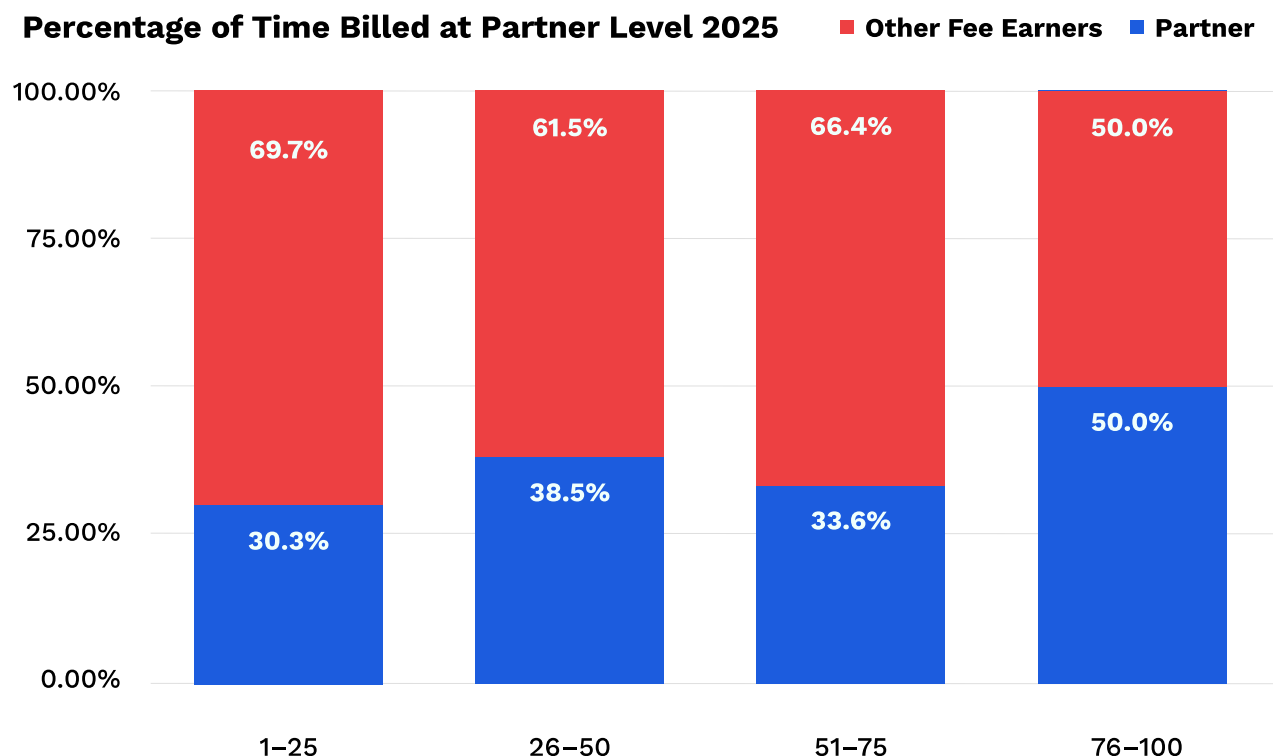
Partner Rates by Metro Area 2025



Resourcing Mix

How firms allocate work across partners and more junior fee-earners plays a critical role in determining overall legal spend.

In 2025, partners accounted for 30% of billable work at the top 25 law firms, compared to 50% at firms ranked 76–100. While the greater partner involvement at lower-ranked firms might raise cost concerns, their partner rates are nearly half those at top-tier firms on average, which keeps overall matter costs down.



The takeaway for in-house teams: heavy partner billing at top-tier firms has a much greater financial impact than similar allocations at lower-ranked firms, due to their higher hourly rates. Monitoring resourcing patterns remains critical to controlling overall spend.

Emerging Trends: AI's Impact on Law Firm Rates

Firms across the Am Law® 100 are investing in artificial intelligence (AI) technologies, primarily to drive internal efficiencies and streamline routine legal workflows. While widespread operational use of these tools is still in early stages, we are approaching a tipping point: one where AI will materially impact how firms deliver legal services and, by extension, how they price them.

For in-house teams, the implications are significant. AI is poised to reshape the foundational unit of legal pricing: the billable hour.



What's Changing?

AI is accelerating how legal work gets done. Tools that support research, drafting, and revision—traditionally the domain of junior associates—are already reducing the number of human hours required to complete legal tasks.

Over time, this will lead to:

- **Fewer hours billed per matter**, as more work is completed by AI.
- **Smaller teams staffed per matter**, particularly fewer junior associates.

On the surface, these trends may suggest cost savings for the legal department. But the reality may be more complex.



How Law Firms Are Likely to Respond

To maintain revenue, firms will likely adjust their pricing to offset reduced billable hours. After all, the value of resolving a matter remains unchanged—or may even increase—when AI enables faster, higher-quality, and more consistent outcomes. To capture that value, firms are expected to raise hourly rates and other commercial models to maintain or improve on their current margins.



Is the Hourly Rate Model at Risk?

Some have speculated that AI will hasten a broader shift away from hourly billing toward value-based pricing. While such a transformation is possible, it's unlikely to happen quickly. The billable hour remains deeply embedded in law firm economics, incentive structures, and client expectations.

That said, the economic pressure created by AI-enabled efficiency gains may create an opening for firms and clients to experiment more seriously with fixed-fee engagements and other alternative fee arrangements.



What In-House Teams Should Watch For

There are three early indicators that AI is starting to affect how law firms are getting work done, even if it might not show up in the form of reduced pricing:

1. **Reductions in total billed hours per matter**, particularly for repeatable work.
2. **Shifts in resourcing patterns**, such as fewer junior timekeepers and more partner time billed.
3. **Rate increase requests** that significantly outpace increases seen today.

In-house teams should track these patterns in their own data and use them to inform rate negotiations. Ultimately, clients and firms should share the value created by deploying AI to resolve matters.

While it may not always feel like it, legal departments are in the driver's seat when it comes to negotiating rates. Now more than ever, it pays to negotiate confidently and explore new partnerships when needed.

Brightflag is closely monitoring how AI adoption is shaping rates and resourcing, and will be among the first to reflect these shifts in future benchmarking data.

Recommendations

Armed with the insights in this report, in-house teams can enter rate negotiations with a clearer understanding of what constitutes an acceptable increase — and greater confidence in pushing back when proposals exceed market norms.

At the same time, effectively managing outside counsel rates is not a one-time exercise. To keep legal spend under control, teams need to take a structured, ongoing approach to monitoring and managing their law firm engagements.

Here are a few strategies that legal departments can apply to get — and stay — ahead of outside counsel costs:

Enforce agreed rates systematically.

Require firms to submit and adhere to approved timekeeper rates via an e-billing system.

Push back on excessive increases.

Use benchmarking data to challenge rate requests that exceed market norms.

Right-source strategically.

Reserve engagements with top firms for the highest-risk, most complex matters.

Redirect routine or lower-risk work to regional firms, ALSPs, or flexible legal talent.

Monitor resourcing closely.

Track the proportion of partner time billed and ensure staffing is aligned with the complexity and risk of the task at hand.

Keep an eye on AI adoption.

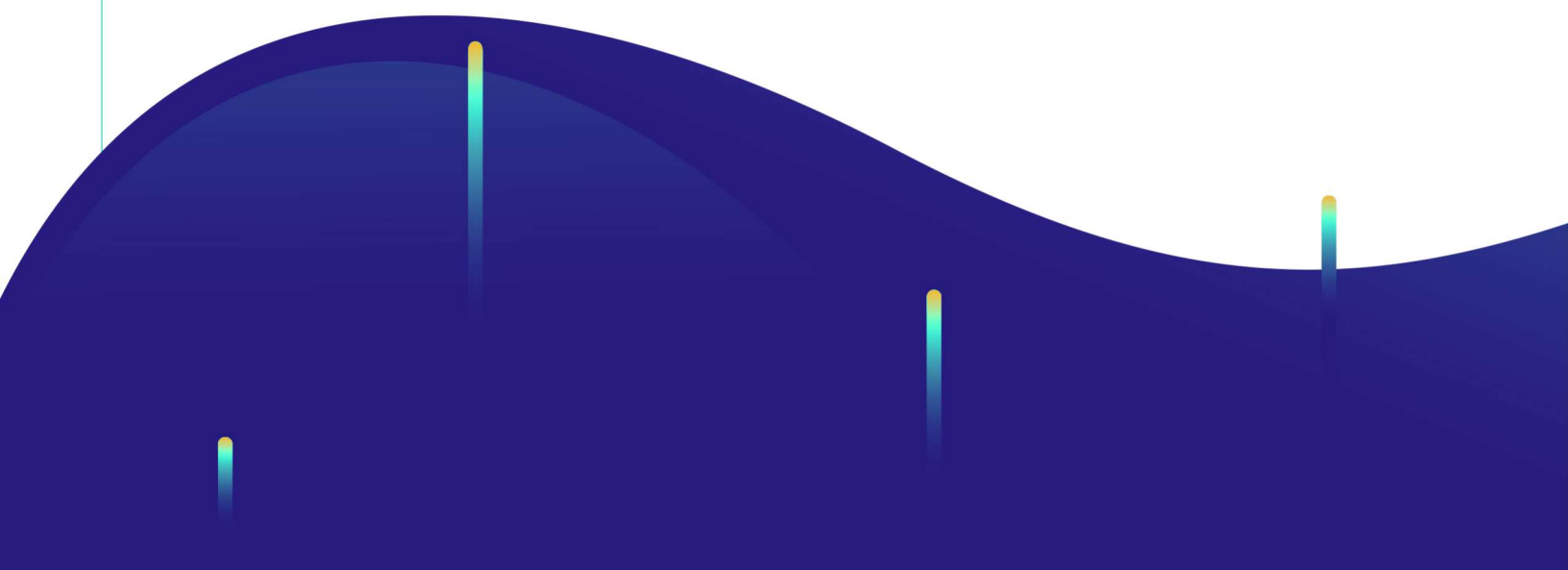
While still in early stages, AI is beginning to change how firms approach staffing and task completion. Over time, these changes may impact billing models and cost expectations.

For now, legal teams should begin asking firms how they're using AI and whether it's reducing manual work—especially for repeatable tasks like research or document review.

Closing

The forces shaping outside counsel costs in 2025 are largely familiar: firm ranking, practice area, geography, and resourcing remain the strongest drivers of rates. But in-house teams are not without influence. With the right data and a clear understanding of how and where work is delivered, legal departments can make smarter sourcing decisions and maximize the value received from their outside counsel spend.

While artificial intelligence is not yet a dominant factor in rate setting, its growing presence in law firm workflows suggests new questions will arise in future negotiations. Staying informed and engaged on these trends now will ensure your team is prepared as technology begins to reshape how legal services are delivered—and priced.



About Brightflag

Brightflag's enterprise legal management platform is the most effective solution for providing visibility into legal work and spend. The intuitive AI-powered platform makes in-house legal teams more productive by taking on time-consuming, manual, tasks related to invoicing, reporting, and matter management.

About the Authors



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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.



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