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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ORANGE

OSCAR MEJORADO, individually, and on behalf of all others similarly situated,

Plaintiff,

v.

RAINBOW SANDALS, INC.; and DOES 1 through 10, inclusive,

Defendants.

Case No.: 30-2022-01283098-CU-OE-CXC

[Assigned for all purposes to the Hon. Melissa R. McCormick, Dept. CX-105]

DECLARATION OF BENJAMIN H. HABER IN SUPPORT OF PLAINTIFF'S MOTION FOR FINAL APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT

Final Approval Hearing:
Date: December 10, 2026
Time: 2:00 p.m.
Dept.: CX-105

Complaint filed: September 28, 2022
FAC filed: December 15, 2022
Trial date: None set

DECLARATION OF BENJAMIN H. HABER

I, Benjamin H. Haber, declare as follows:

1. I am an attorney at law licensed to practice before all courts of the State of California. I am a Partner at Wilshire Law Firm, PLC ("WLF" or "Class Counsel"), counsel of record for Plaintiff Oscar Mejorado ("Plaintiff"). I have personal knowledge of the facts set forth in this declaration and could and would competently testify to them under oath if called as a witness.

2. I submit this declaration in support of Plaintiff's Motion for Final Approval of Class Action and PAGA Settlement.

3. Plaintiff is represented by WLF. The attorneys at WLF performed significant work and incurred litigation costs in prosecuting this matter with no guarantee of payment.

4. WLF was selected by Best Lawyers and U.S. News & World Report as one of the nation's Best Law Firms since 2020 and is comprised of more than 100 attorneys and over 600 employees. WLF is active in the practice of employment litigation, representing employees in both individual and class actions in state and federal courts throughout California.

5. WLF is qualified to handle this litigation because its attorneys are experienced in litigating individual, class, and representative actions. WLF has handled, and is currently handling, many wage and hour class actions, as well as class actions involving consumer rights and data privacy litigation.

6. I am a Partner at WLF. I graduated from the University of California, Los Angeles, in 2012 and received my Juris Doctor from the University of California, Hastings College of the Law (now the University of California College of Law, San Francisco) in 2016. During law school, I was a member of the executive board for the *Hastings Law Journal*, a student mediator at the San Francisco Superior Court, Small Claims Division, and a managing editor for *SCOCAblog,* which continues to be a leading online publication for the analysis of trends and cases before the California Supreme Court. Since graduating from law school, my legal work has focused primarily on complex wage-and-hour litigation, and I have helped obtain more than one hundred class and representative action settlements on behalf of tens of thousands of workers in California. I was also

selected as a "Southern California Rising Star" for each year between 2024 and 2027.

7. I have been appointed as class counsel in numerous wage-and-hour class and representative actions throughout California. Below is a non-exhaustive list of cases where I or other members of WLF and I were appointed as class counsel:

a. *Colter v. Propulsion Controls Engineering*, San Diego County, Case No. 37-2020-00030682-CU-OE-CTL; Motion for Final Approval granted on October 28, 2022.

b. *Rodriguez v. Modesto Restaurant Group, LLC*, Stanislaus County, Case No. CV-21-000269; Motion for Final Approval granted on January 10, 2023.

c. *Kingsbury v. Caravan Foods II, Inc.*, Alameda County, Case No. RG21096357; Motion for Final Approval granted on January 31, 2023.

d. *Frias-Estrada v. Trek Retail Corporation*, Contra Costa County, Case No. MSC20-01916; Motion for Final Approval granted on March 3, 2023.

e. *Varez v. Valley Connection, LLC dba Carl's Jr.*, Merced County, Case No. 22CV-00985; Motion for Final Approval granted on April 27, 2023.

f. *Reyes v. Everytable, PBC, et al.*, Los Angeles County, Case No. 21STCV35987; Motion for Final Approval granted on May 3, 2023.

g. *Ortiz v. Tara Materials, Inc.*, San Diego County, Case No. 37-2021-0001473-CU-OE-CTL; Motion for Final Approval granted on May 30, 2023.

h. *Cruz-Sanchez v. Eagle Lath & Plaster, Inc.*, Sacramento County, Case No. 34-2021-00293739-CU-OE-GDS; Motion for Final Approval granted on May 30, 2023.

i. *Garduno v. New Generation Framing, Inc., et al.*, Stanislaus County, Case No. CV-21-000544; Motion for Final Approval granted on August 11, 2023.

j. *Hernandez, et al. v. Burford Farming Company, Inc.*, Fresno County, Case No. 21CECG03817; Motion for Final Approval granted on August 21, 2023.

k. *Barajas v. Final Phase Construction, Inc.*, San Bernardino County, Case No. CIVSB2118622; Motion for Final Approval granted on September 13, 2023.

l. *Jaimes, et al. v. Infiniti Health LLC*, Los Angeles County, Case No.

22STCV07261; Motion for Final Approval granted on October 17, 2023.

m. *Nunez v. Gabriel Container*, Los Angeles County, Case No. 21STCV09787; Motion for Final Approval granted on November 2, 2023.

n. *Gutierrez v. Next Level Door & Millwork, Inc.*, Riverside County, Case No. CVRI2105455; Motion for Final Approval granted on January 11, 2024.

o. *Lupercio v. Western CNC, Inc.*, San Diego County, Case No. 37-2021-00010314-CU-OE-CTL; Motion for Final Approval granted on January 26, 2024.

p. *Jackson, et al. v. Apple Valley Communications, Inc.*, *et al.*, San Bernardino County, Case No. CIVSB2124721; Motion for Final Approval granted on February 1, 2024.

q. *Cuadras, et al. v. Guinn Corporation*, Kern County, Case No. BCV-21-101520; Motion for Final Approval granted on February 22, 2024.

r. *Canton, et al v. John B. Sanfilippo & Sons, Inc.*, Merced County, Case No. 22-CV-01145; Motion for Final Approval granted on March 15, 2024.

s. *Williams v. Total Longterm Care, Inc., et al.*, San Bernardino County, Case No. CIVSB2213347; Motion for Final Approval granted on April 2, 2024.

t. *Espinoza v. Delallo's Italian Foods, Inc.*, Butte County, Case No. 21CV02640; Motion for Final Approval granted on April 24, 2024.

u. *Meza v. Argus Management Company, LLC*, *et al.*, Los Angeles County, Case No. 21STCV31612; Motion for Final Approval granted on May 20, 2024.

v. *Wade v. Mallory Safety and Supply LLC*, Siskiyou County, Case No. 23CV00951; Motion for Final Approval granted on July 11, 2024.

w. *Abarca-Rueda, et al. v. Foley Family Wines, Inc., et al.*, Sonoma County, Case No. S-CV-268148; Motion for Final Approval granted on August 21, 2024.

x. *Aguilar v. American Pasteurization Company, Inc., et al.*, Sacramento County, Case No. 34-2021-00312027-CU-OE-GDS; Motion for Final Approval granted on September 3, 2024.

y. *Hayes, et al. v. Gonzales Park, LLC, et al.*, Butte County, Case No. 21CV02456;

Motion for Final Approval granted on May 1, 2024.

z. *Hernandez v. KW California, et al.*, Kern County, Case No. BCV-23-100346; Motion for Final Approval Granted on December 4, 2024.

aa. *Arias v. The Shyft Group GTB, LLC, et al.,* Los Angeles County, Case No.22STCV37390; Motion for Final Approval granted on December 3, 2024.

bb. *Barajas Maya v. United Facilities Group, Inc., et al.*, Santa Clara County, Case No. 22CV397353; Motion for Final Approval granted on November 22, 2024.

8. Daniel J. Kramer is a tenth-year Senior Attorney at Wilshire Law Firm, PLC. He was admitted to practice law in the State of California and the Central, Eastern, Southern, and Northern Districts of California. He graduated from Stanford University with a Bachelor of Arts in History and Political Science and received his Juris Doctor from Loyola Law School, Los Angeles in 2016. During law school, he was a research editor for the Loyola of Los Angeles International and Comparative Law Review. Before joining Wilshire Law Firm, he practiced briefly at a firm that focused on municipal law and code enforcement and then moved to a respected plaintiff-side firm to practice complex wage and hour litigation. Mr. Kramer currently bills at an hourly rate of $850.00.

9. Mr. Kramer has several years of work experience litigating wage and hour class and representative actions and has been appointed as class counsel in numerous cases, including:

a. *Hayes, et al. v. Gonzales Park, LLC, et al*., Butte County, Case No. 21CV02456; Motion for Final Approval granted on May 1, 2024.

b. *Hernandez v. KW California, et al*., Kern County, Case No. BCV-23-100346; Motion for Final Approval granted on December 4, 2024.

c. *Petrossian v. The Testing Company LLC*, Los Angeles County, Case No. 22STCV34526; Motion for Final Approval granted on December 23, 2024.

d. *Conchas Jimenez v. The Castine Group*, Santa Clara County, Case No. 21CV375173; Motion for Final Approval granted on February 6, 2025.

e. *Svay v. Certainteed, LLC*, Madera County, Case No. MCV093066; Motion for Final Approval granted on May 20, 2025.

f. *Chavira, et al. v. Mark III Construction, Inc*., Sacramento County, Case No. 34-2021-00308972-CU-OE-GDS; Motion for Final Approval granted on January 30, 2026.

g. *Mendoza, et al. v. OSI Industries, LLC*, Riverside County, Case No. CVRI2203101; Motion for Final Approval granted on February 27, 2026.

10. Angela Leong is a 12-year Associate Attorney at WLF. She is admitted to practice law in the State of California and the Central Districts of California. She graduated from the University of Macau with a Bachelor's Degree in English Communications, received a Master of Science from the Southern Illinois University Carbondale, and received her Juris Doctor from Whittier Law School in 2014. In the early years of her legal career, Ms. Leong advocated for low-income individuals, which eventually led her to pursue employment law. Her practice now focuses on litigating wage and hour class actions. Ms. Leong currently bills at an hourly rate of $750.00.

11. Christina M. Le is Junior Partner a WLF. She is admitted to practice in the State of California, the Ninth Circuit Court of Appeals, and the United States District Courts for the Central, Southern, Eastern, and Northern Districts of California. She graduated from Loyola Law School, Los Angeles, and attended the University of California, Berkeley for her undergraduate studies, where she obtained a Bachelor of Arts in History. She has over 15 years of litigation experience, which includes the successful handling of numerous employment, wage and hour, and class and representative action matters during the latter half of her career, in state and federal court through inception through resolution. Prior to joining WLF in November 2021, Ms. Le gained invaluable litigation experience working at various plaintiffs and defense firms, including Kristensen Weisberg PLC, Jones Bell LLP, Archer Norris PLC, and Lewis Brisbois Bisgaard & Smith LLP. Ms. Le is a member of NELA, CELA, CAALA, LACBA, and the Vietnamese Bar Association of Southern California and has been a recognized speaker on wage and hour topics for some of these organizations at various conferences and seminars. Ms. Le currently bills at an hourly rate of $950.00

12. Karen L. Wallace is a Senior Attorney at WLF. She earned a Ph.D. in English at the

University of California, Los Angeles, and taught literature and writing for many years. She returned to school in 2007 and earned a J.D. with a public service distinction from Southwestern Law School in 2010, when she was admitted to the California State Bar. Her practice has focused on complex wage and hour and consumer cases on behalf of plaintiffs, and she has litigated class and representative actions in both state and federal courts throughout California. Ms. Wallace currently bills at an hourly rate of $950.00.

13. Lucy H. Nguyen is a former Settlement Attorney at WLF. She graduated from San Francisco State University with a Bachelor of Science degree in Business Management and earned her Juris Doctor from John F. Kennedy University, School of Law in 2011. Ms. Nguyen was admitted to practice law in the State of California in 2021. Prior to joining WLF, Ms. Nguyen practiced employment and family law litigation and handled a high-volume statewide docket involving wage-and-hour disputes and complex litigation matters. While at WLF, Ms. Nguyen's practice focused on wage-and-hour class actions and representative actions under the California Private Attorneys General Act ("PAGA"), including drafting and negotiating class and PAGA settlements, approval motions, and related settlement documents. In this and other matters, Ms. Nguyen analyzed liability and exposure, drafted settlement agreements and approval papers, coordinated settlement administration issues, and assisted with class and PAGA settlement approval proceedings. Ms. Nguyen billed at an hourly rate of $650.00 during the pendency of the action.

14. Justin F. Marquez is a former Senior Partner at WLF who was actively involved in the litigation and resolution of this Action from its inception through December 2024. He graduated magna cum laude and Phi Beta Kappa from University of California, Los Angeles's College Honors Program in 2004 with Bachelor of Arts degrees in History and Japanese. He graduated from Notre Dame Law School with a Juris Doctorate. He was admitted to the State Bar of California in February 2009. His practice focused primarily on advocating for the rights of consumers and employees in class action and appellate litigation. He received numerous awards for his legal work: from 2017 to 2020, Super Lawyers selected him as a "Southern California Rising Star," and from 2022 to 2025, he was selected as a "Southern California Super Lawyer";

he was selected as one of the "Best Lawyers in America" from 2023 to 2025; and in 2024, he, along with his colleagues at WLF, received a CLAY (California Lawyer Attorneys of the Year) award for their work on a false advertising case against Apple, which ultimately led to a $25 million settlement. He also was selected to speak at multiple CELA conferences throughout his career – in 2019, he spoke on the topic of manageability of class actions at CELA's 2019 Advanced Wage & Hour Seminar, and in 2024, he spoke on the topic of dealings with multiple cases against the same defendant at CELA's 2024 Advanced Wage & Hour Seminar. He served as lead or co-lead in negotiating class action settlements worth over $10 million in gross recovery to class members for each year since 2020, including over $37.5 million in 2022 and over $75 million in 2023. Mr. Marquez billed at an hourly rate of $1,500.00 during the pendency of the action.

15. Alan Wilcox is a former Senior Attorney at WLF. He obtained his Bachelor's Degree from the University of California, Berkeley in 2007. He graduated from Pepperdine University's School of Law and became a member of the California State Bar in 2012. Until his employment at WLF, Mr. Wilcox was employed as a civil litigation attorney at multiple law firms. He has represented clients in both state and federal Courts in a wide variety of matters, including contract disputes, wrongful foreclosure, unlawful detainer, divorce, product defect, tort, and employment. Mr. Wilcox billed at an hourly rate of $950.00 during the pendency of the action.

16. Conor J.D. Gomez is a former Attorney at WLF who was responsible for finalizing resolved class action and PAGA matters and ensuring that they were carried through the approval and distribution process in an efficient manner and in compliance with court orders. He graduated from the University of California, Los Angeles School of Law in May 2020. Mr. Gomez passed the California Bar Examination on his first attempt and was admitted to practice in May 2021. He is admitted to practice law in the State of California and before the Northern District of California. Mr. Gomez billed at an hourly rate of $575.00 during the pendency of the action.

17. WLF's hourly rates are comparable to those charged by other class action plaintiffs' counsel and the firms defending class actions. WLF's rates are well within the range

of hourly rates that the Los Angeles legal marketplace would compensate counsel for similar services accomplishing similar results. For example, in *Bronshteyn v. State of California*, the trial court approved and the California Court of Appeals affirmed plaintiff's counsel's 2022 hourly rates of $1,100 and $1,000 for the work performed by senior attorneys on an employment class action case. (*Bronshteyn v. Department of Consumer Affairs* (2025) 114 Cal.App.5th 537, 542, review denied (Dec. 17, 2025).) These rates were then augmented by a 1.75 lodestar multiplier and affirmed by the California Court of Appeals. *Id*. In *Suarez v. Bank of America, National Association*, the Northern District of California approved WLF's hourly rates of $1,500 for a senior partner and $1,000 for a senior attorney for work performed on an employment class action and found the billing rates to be "normal and customary for timekeepers with similar qualifications and experience in the relevant market." *Suarez v. Bank of America, National Association* (N.D. Cal., Jan. 11, 2024, No. 18-CV-01202-LB) 2024 WL 150721, at *3. Moreover, in *Moreno v. Pretium Packaging, L.L.C*., the Central District of California found WLF's multiplier of 2.57 for a wage-and-hour class action case to be reasonable "in light of the contingent nature of recovery, the complexity of the issues, and the result obtained." *Moreno v. Pretium Packaging, L.L.C*. (C.D. Cal. Aug. 6, 2021) No. 8:19-cv-02500-SB, 2021 WL 3673845, at *3. The rates requested here are well in line with those found reasonable in *Bronshteyn, Suarez,* and *Moreno*.

18. In support of the reasonableness of WLF's hourly rates, attached as **Exhibit 1** is a true and correct excerpt from the *2025 Real Rate Report* published by Wolters Kluwer. The Real Rate Report is widely relied upon in the legal industry because it is derived from anonymized billing data taken from actual law firm invoices that were submitted to clients and approved for payment, rather than from voluntary surveys or self-reported rates. Although the report refers to "2025" rates, the data reflects rates charged by law firms during the first half of 2024 and therefore represents the most recent available objective evidence of prevailing market rates.

a. The Real Rate Report further shows that in Southern California, partners with 21 or more years of experience command third-quartile billing rates of approximately $1,334 per hour, confirming that highly experienced litigators in

major Southern California markets routinely bill at the upper end of the rate spectrum.

b. The 2025 Real Rate Report's practice-area-specific data further supports this conclusion. Page 81 provides third-quartile rates for the detailed practice category "Employment and Labor: Other Litigation," which is directly analogous to the type of work performed in this case. That dataset includes 24 partners and 14 associates and shows a third-quartile rate of $1,252 per hour for partners and $564 per hour for associates. These figures demonstrate that even within the specialized employment litigation market, partners regularly bill well above $1,200 per hour based on rates actually charged to clients. When this practice-specific benchmark is considered together with the broader regional market data, it confirms that WLF's hourly rate for highly experienced counsel in a representative employment action falls within the upper range of prevailing market rates rather than outside it.

c. The Real Rate Report does not provide 4th quartile rates, presumably to provide a sense of the average attorney billing rates. Importantly, the third quartile represents the point below which 75% of rates fall; it is not a cap on reasonable rates. By definition, a substantial portion of partners in the relevant benchmark market routinely bill above that level, particularly those with extensive experience, specialized expertise, or leadership roles in complex litigation. Courts evaluating fee requests recognize that leading counsel in complex or representative actions may reasonably bill above median or third-quartile benchmarks where their experience, results obtained, and responsibilities justify higher rates. We firmly believe WLF belongs in the 4th quartile of attorney billing rates in Southern California.

19. As previously discussed, WLF is a nationally recognized employment litigation firm that has been named one of the nation's *Best Law Firms* by U.S. News & World Report and Best Lawyers since 2020, and its attorneys regularly litigate complex wage-and-hour class and

representative actions throughout California.

20. In an article entitled "Big Law Rates Topping $2,000 Leave Value 'In Eye of Beholder,'" published by Bloomberg Law on June 9, 2022, author Roy Strom describes how Big Law firms have crossed the $2,000-per hour rate. Mr. Strom also notes that law firm rates have been increasing by just under 3% per year. A true and correct copy of the June 9, 2022 article is attached as **Exhibit 2**.

21. WLF has performed significant work and incurred litigation costs in prosecuting this matter with no guarantee of any payment. The efforts expended by Plaintiff's counsel to achieve this result include, but are not limited to, the following:

a. investigating the claims and defenses at issue, including meeting with Plaintiff, reviewing Defendant Rainbow Sandals, Inc.'s ("Defendant") written policies in effect during the Class Period, reviewing Class Members' time and pay records, and researching Defendant's corporate structure;

b. drafting and filing Complaint to initiate the Action;

c. meeting and conferring with Defendant regard the litigation and attending status conferences;

d. meeting and conferring with Defendant regarding mediation and the exchange of informal discovery;

e. analyzing representative sampling with the aid of a consultant and Plaintiff to analyze Defendant's potential liability and exposure;

f. preparing the mediation brief and damages model for mediation and communicating with Plaintiff;

g. attending the mediation;

h. negotiating and finalizing the Settlement, the Agreement, and the First and Second amendments to the Agreement;

i. preparing and filing the Motion for Preliminary Approval and supporting documents;

j. attending the hearing on Motion for Preliminary Approval;

k. communicating with Class Members who sought additional information regarding the Settlement; and

l. preparing the instant Motion for Final Approval and supporting documents.

22. WLF's current lodestar reflects the efficiencies achieved by attorneys experienced in this practice area with 110.8 hours of work resulting in $104,345.00 in fees. A true and correct copy of Class Counsel's detailed billing records in this matter is attached as **Exhibit 3**. The chart below shows the calculation of hours spent by each of WLF's attorneys on this case:

Attorney	**Hours**	**Hourly Rate**	**Total**
Benjamin H. Haber	20.2	$950.00	$19,190.00
Daniel J. Kramer	9.2	$850.00	$7,820.00
Angela Leong	1.8	$775.00	$1,395.00
Christina Le	26.9	$950.00	$25,555.00
Karen L. Wallace	23.6	$950.00	$22,420.00
Lucy H. Nguyen	12.3	$600.00	$7,380.00
Justin F. Marquez[1]	10	$1,500.00	$15,000.00
Alan Wilcox	4.3	$950.00	$4,085.00
Conor J.D. Gomez	2.5	$600.00	$1,500.00
TOTAL	**110.8**		**$104,345.00**

23. This amount surpasses the requested fee award of $75,000.00, resulting in a negative multiplier. Class Counsel's lodestar does not include the time Class Counsel will spend

[1] As described above, as of December 2024, Justin F. Marquez is no longer with WLF. I have conservatively estimated at least 10 hours of work by Mr. Marquez on this matter, which includes, but is not limited to, assisting with the complaint, participating in several meetings regarding the case and case strategy, assisting with the mediation materials and brief, attending the mediation, and reviewing settlement-related documents. In the event the Court strikes Mr. Marquez's hours, the remaining lodestar would be $89,345.

at the Final Approval Hearing and assisting the Administrator following final approval. WLF dedicated significant resources to this case and divided the tasks required according to skill level. The hours expended by each attorney were not duplicative and reflect the extensive investigation and analysis that was required to achieve this Settlement, which time could have been spent on other potentially lucrative cases.

24. Moreover, WLF assumed the risk and costs of litigation purely on a contingency basis. While Plaintiff is confident in the merits of his claims, a legitimate controversy exists as to each cause of action, posing an actual risk that Plaintiff may not certify a class and/or prevail at trial. Any of these obstacles could have prevented recovery completely, meaning Class Counsel would have been left with no compensation for the resources expended in litigating this case. Despite these risks, WLF took this case on a contingency basis to ensure that Class Members (a particularly vulnerable group of hourly paid workers) could receive compensation for their unpaid wages. Class Counsel were thus not able to focus on, or accept, other cases that could have resulted in greater, and less risky, monetary gain.

25. WLF has incurred $20,117.63 in litigation costs, including fees for filing, service, mediation, and consultation. A true and correct copy of WLF's itemized list of litigation costs is attached as **Exhibit 4**. Since Class Counsel's costs exceeded the agreed-upon maximum of $15,000.00, Class Counsel requests final approval of the full $15,000.00. These costs were reasonable and necessary to prosecute this case and obtain the results achieved.

26. Class Counsel has negotiated a settlement here that they believe is fair, reasonable, and adequate based on their extensive experience litigating class and representative actions.

27. A true and correct copy of the Parties' fully executed Class Action and PAGA Settlement Agreement and Class Notice, the First Amendment to Class Action and PAGA Settlement Agreement and Class Notice, and the Second Amendment to Class Action and PAGA Settlement Agreement and Class Notice (collectively, "Agreement") is attached as **Exhibit B** to the Supplemental Declaration of Lucy Nguyen in support of Plaintiff's Motion for Preliminary Approval, filed July 2, 2026 (ROA #122) ("Supp. Nguyen Decl.") ¶ 4.

28. On July 6, 2026, my office submitted a copy of the Agreement to the LWDA. *See*

also Supplemental Declaration of Alan Wilcox in support of Plaintiff's Motion for Preliminary Approval, filed July 6, 2026 (ROA #124) ("Supp. Wilcox Decl.") ¶¶ 3, 4, Ex. A.

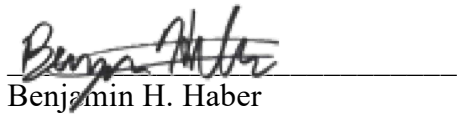
29. To date, the LWDA has not responded to or objected to the Settlement in this matter.

30. WLF has no fee splitting agreement with any other firm.

31. Class Counsel note that Plaintiff deserves compensation for his role in obtaining in this Settlement on behalf of absent Class Members, especially since no Class Member objected to the requested award.

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

Executed on November 16, 2026 at Los Angeles, California.



Benjamin H. Haber

EXHIBIT 1



ELM Solutions

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A Letter to Our Readers

Welcome to the latest edition of the Real Rate Report®, the legal industry's most trusted benchmark for legal billing rates.

Since 2010, the Real Rate Report has helped legal departments and law firms make smarter decisions about pricing, resourcing, and vendor management. That hasn't changed. What has changed is how we deliver those insights.

This year, the Real Rate Report is powered by LegalVIEW® DynamicInsights—our new digital-first platform that brings the same trusted LegalVIEW data to life in a more interactive, flexible, and timely way. Leveraging Wolters Kluwer's LegalVIEW database, with over $200B in anonymized, approved, invoice data, LegalVIEW DynamicInsights offers dynamic filters, quarterly updates, and calendar-year alignment to help users tailor benchmarks to their unique needs, on demand.

The Real Rate Report remains a vital snapshot of the market, and we know many of you rely on it as a reference tool. But DynamicInsights goes further. It enables deeper exploration of rate trends by role, experience, geography, practice area, industry, and more. Whether you're negotiating rates, evaluating law firm performance, or planning budgets, DynamicInsights gives you the agility and precision today's legal environment demands.

As always, we welcome your feedback and thank our data contributors for making this work possible. We're proud to be your partner in legal analytics and look forward to continuing to deliver insights that drive better business outcomes.

Sincerely,



Brian Jorgenson
Vice President, Product Management
Wolters Kluwer ELM Solutions

Real Rate Report Overview

The Real Rate Report is powered by LegalVIEW DynamicInsights, a web-based solution that delivers dynamic, invoice-backed insights through approved legal billing rates. It enables legal professionals to analyze rate trends by role, experience, industry, geography, practice area, and more using the world's largest repository of legal spend data.

DynamicInsights leverages the same trusted LegalVIEW database that has powered the Real Rate Report for years, now encompassing over $200B+ in anonymized, approved legal invoice data. As with previous Real Rate Reports, our data is sourced from corporations' and law firms' e-billing and time management solutions. We have included lawyer and paralegal rate data filtered by specific practice and sub-practice areas, metropolitan areas, and types of matters. This level of granularity gives legal departments and law firms the precision they need to identify areas of opportunity.

What's different with DynamicInsights?

Same source, same methodology: DynamicInsights uses the same rigorous data validation and methodology as the Real Rate Report.

- **Enhanced flexibility:** With dynamic filters, DynamicInsights enables users to tailor benchmarks to their unique needs and on demand.
- **Full year data:** DynamicInsights now aligns to a calendar year view—January through December—replacing the previous July-to-June format used in the Real Rate Report, reducing confusion and improving consistency across reporting periods.
- **More up to date:** Unlike the annual and static Real Rate Report, DynamicInsights is refreshed quarterly, offering more timely insights.
- **Digital-first access:** Delivered via a secure online interface, users can interact with the data, bookmark views, and share insights in real time.

DynamicInsights provides the same level of credibility and analytical power long trusted in the Real Rate Report with more agility and transparency for today's legal environment.

2025 Real Rate Report use considerations

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

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

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

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

Examples of data to consider when reviewing rates:

- **Industry** – Compare spend and rate trends across various industries
- **Practice area** – Analyze cost variations in different legal practice areas
- **Detailed practice area** – Drill down into niche legal specialties for precise benchmarking
- **Am Law** – Benchmark against top-ranked law firms for competitive rate analysis
- **City** – Understand rate trends in specific metropolitan areas
- **Country** – Gain a global perspective on legal costs and spend management
- **Role** – Assess legal spend distribution across different law firm roles

Real Rate Report Overview

Understanding key statistical terms

To help interpret the legal rate data presented in DynamicInsights and this report, it's important to understand the statistical measures used. Below are definitions of the core metrics:

- **Mean (average):** The sum of all rate values divided by the total number of values added. It provides a general sense of the central tendency of the rates but can be influenced by extreme values (outliers).
- **Median:** The middle value when all rates are arranged in ascending order. If there is an even number of rates being analyzed, the median is the average of the two middle rates. It is a robust measure of central tendency of rates that is less affected by outliers.
- **First quartile (Q1):** The value below which 25% of the rates fall. It marks the lower boundary of the middle 50% of the rates and helps identify the lower range of typical values.
- **Third quartile (Q3):** The value below which 75% of the rates fall. It marks the upper boundary of the middle 50% of the rates and helps identify the upper range of typical values.
- **n:** The number of unique timekeepers contributing to the data.

These metrics are used to provide a more nuanced view of legal rates, helping users identify trends, outliers, and benchmarks across various dimensions.

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- Increased efficiencies free up time for more value-add work

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Legal rates keep climbing and 2026 will be no exception. Stay ahead with award-winning insights designed to give your team the edge in every negotiation.

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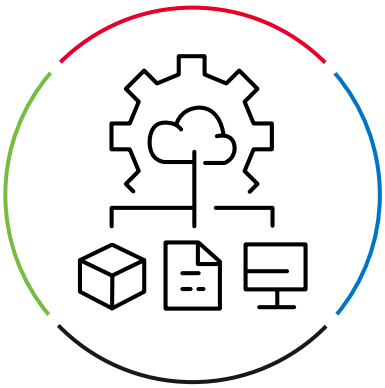
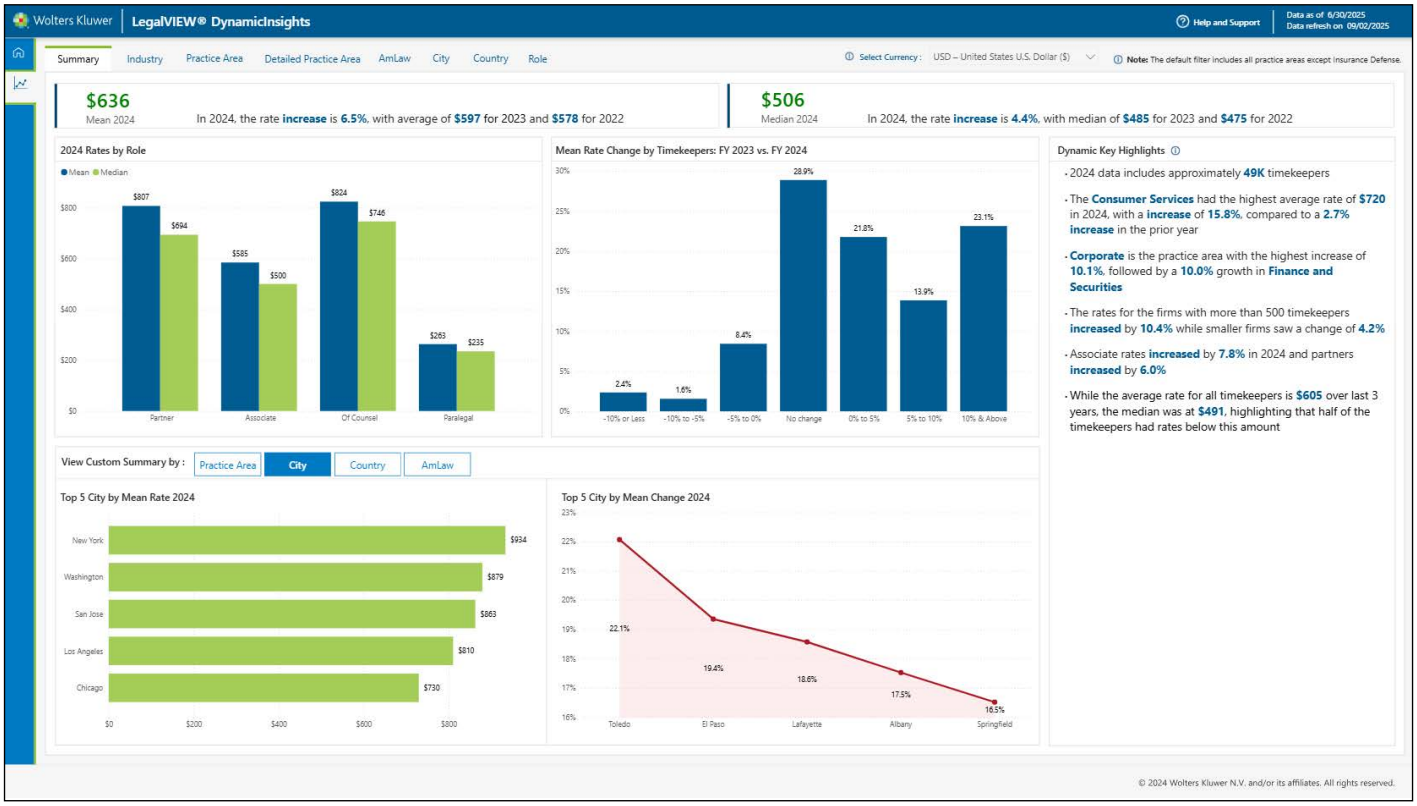
- **Unmatched Data Power:** Leverages over **$200B in invoice-backed legal spend data** to deliver deep, actionable insights.
- **Strategic Legal Spend Management:** Empowers legal teams to negotiate smarter, plan more effectively, and control costs with greater precision.
- **Enhanced Transparency & Collaboration:** Strengthens law firm-client relationships through data-driven transparency and benchmarking.
- **Insight-Driven Decision Making:** Enables analysis across key dimensions to support strategic negotiations and financial optimization.





Wolters Kluwer

Section I: High-Level Data Cuts

All data and analysis based on data collected thru Q2 2025

Section I: High-Level Data Cuts

Cities
By Role

2025 Real Rates for Associate and Partner **Trend Analysis - Mean**

City	Role	n	First Quartile	Median	Third Quartile	2025	2024	2023
Los Angeles CA	Partner	565	$517	$925	$1,365	$993	$979	$913
	Associate	518	$485	$720	$982	$761	$741	$684
Louisville KY	Partner	32	$291	$395	$500	$411	$395	$380
	Associate	19	$275	$290	$342	$304	$274	$268
Madison WI	Partner	10	$275	$420	$491	$420	$443	$563
Memphis TN	Partner	22	$325	$394	$470	$404	$428	$387
Miami FL	Partner	191	$250	$525	$733	$547	$570	$575
	Associate	128	$175	$330	$479	$357	$389	$393
Milwaukee WI	Partner	32	$364	$459	$649	$524	$581	$525
	Associate	18	$322	$455	$690	$498	$462	$404
Minneapolis MN	Partner	138	$475	$694	$918	$692	$673	$637
	Associate	111	$333	$450	$620	$485	$467	$432

Section I: High-Level Data Cuts

Cities
By Years of Experience

2025 Real Rates for Partner **Trend Analysis - Mean**

City	Years of Experience	n	First Quartile	Median	Third Quartile	2025	2024	2023
Phoenix AZ	21 or More Years	25	$350	$490	$674	$559	$499	$540
Pittsburgh PA	Fewer Than 21 Years	41	$501	$600	$810	$669	$658	$599
	21 or More Years	72	$480	$691	$860	$705	$733	$669
Portland ME	21 or More Years	18	$386	$435	$484	$418	$421	$381
Portland OR	Fewer Than 21 Years	17	$402	$465	$525	$599	$536	$509
	21 or More Years	32	$470	$525	$639	$594	$607	$553
Raleigh NC	21 or More Years	12	$396	$475	$510	$489	$477	$477
Richmond VA	Fewer Than 21 Years	10	$604	$703	$855	$707	$746	$687
	21 or More Years	24	$431	$713	$1,084	$739	$756	$726
Salt Lake City UT	Fewer Than 21 Years	12	$395	$447	$459	$422	$445	$412
	21 or More Years	16	$350	$463	$521	$480	$433	$407
San Diego CA	21 or More Years	33	$438	$785	$1,334	$894	$898	$882

Section II: Industry Analysis

All data and analysis based on data collected thru Q2 2025

Section II: Industry Analysis

Consumer Services

By Detailed Practice Area and Matter Type

2025 - Real Rates for Associate and Partner **Trend Analysis - Mean**

Practice Area	Matter Type	Role	n	First Quartile	Median	Third Quartile	2025	2024	2023
Employment and Labor: Discrimination, Retaliation and Harassment / EEO	**Litigation**	Partner	27	$393	$495	$613	$509	$463	$436
		Associate	19	$400	$475	$493	$437	$387	$370
Employment and Labor: Other	**Litigation**	Partner	24	$564	$692	$1,252	$956	$782	$683
		Associate	14	$384	$469	$564	$553	$484	$458
	Non-Litigation	Partner	25	$450	$574	$695	$579	$573	$548
		Associate	25	$397	$450	$525	$465	$472	$456
Intellectual Property: Patents	**Non-Litigation**	Partner	41	$350	$595	$691	$605	$652	$634
		Associate	51	$208	$373	$517	$382	$378	$389
Real Estate: Leasing	**Non-Litigation**	Partner	17	$410	$539	$865	$616	$664	$667
		Associate	10	$278	$404	$617	$482	$444	$478
Real Estate: Other	**Non-Litigation**	Partner	58	$480	$626	$940	$694	$612	$540
		Associate	39	$320	$460	$733	$503	$468	$415

EXHIBIT 2

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Business & Practice

Big Law Rates Topping $2,000 Leave Value ‘In Eye of Beholder’

By Roy Strom

Column
June 9, 2022, 2:30 AM

Welcome back to the Big Law Business column on the changing legal marketplace written by me, Roy Strom. Today, we look at a new threshold for lawyers’ billing rates and why it’s so difficult to put a price on high-powered attorneys. Sign up to receive this column in your inbox on Thursday mornings. Programming note: Big Law Business will be off next week.

Some of the nation’s top law firms are charging more than $2,000 an hour, setting a new pinnacle after a two-year burst in demand.

Partners at Hogan Lovells and Latham & Watkins have crossed the threshold, according to court documents in bankruptcy cases filed within the past year.

Other firms came close to the mark, billing more than $1,900, according to the documents. They include Kirkland & Ellis, Simpson Thacher & Bartlett, Boies Schiller Flexner, and Sidley Austin.

Simpson Thacher & Bartlett litigator Bryce Friedman, who helps big-name clients out of jams, especially when they’re accused of fraud, charges $1,965 every 60 minutes, according to a court document.

In need of a former acting US Solicitor General? Hogan Lovells partner Neal Katyal bills time at $2,465 an hour. Want to hire famous litigator David Boies? That’ll cost $1,950 an hour (at least). Reuters was first to report their fees.

Eye-watering rates are nothing new for Big Law firms, which typically ask clients to pay higher prices at least once a year, regardless of broader market conditions.

“Value is in the eye of the beholder,” said John O’Connor, a San Francisco-based expert on legal fees. “The perceived value of a good lawyer can reach into the multi-billions of dollars.”

Kirkland & Ellis declined to comment on its billing rates. None of the other firms responded to requests to comment.

Charge It Up

Big Law firms are crossing the $2,000-an-hour threshold after two years of surging rates driven by an increase in demand for lawyers.

Firm	Highest Billing Rate
Hogan Lovells	$2,465
Latham & Watkins	$2,075
Kirkland & Ellis	$1,995
Simpson Thacher & Bartlett	$1,965
Boies Schiller Flexner	$1,950
Sidley Austin	$1,900

Source: Court documents

Bloomberg Law

Law firms have been more successful raising rates than most other businesses over the past 15 years.

Law firm rates rose by roughly 40 percent from 2007 to 2020, or just short of 3 percent per year, Thomson Reuters Peer Monitor data show. US inflation rose by about 28% during that time.

The 100 largest law firms in the past two years achieved their largest rate increases in more than a decade, Peer Monitor says. The rates surged more than 6% in 2020 and grew another 5.6% through November of last year. Neither level had been breached since 2008.

The price hikes occurred during a once-in-a-decade surge in demand for law services, which propelled profits at firms to new levels. Fourteen law firms reported average profits per equity partner in 2021 over $5 million, according to data from The American Lawyer. That was up from six the previous year.

The highest-performing firms, where lawyers charge the highest prices, have outperformed their smaller peers. Firms with leading practices in markets such as mergers and acquisitions, capital markets, and real estate were forced to turn away work at some points during the pandemic-fueled surge.

Firms receive relatively tepid pushback from their giant corporate clients, especially when advising on bet-the-company litigation or billion-dollar deals.

The portion of bills law firms collected—a sign of how willingly clients pay full-freight—rose during the previous two years after drifting lower following the Great Financial Crisis. Collection rates last year breached 90% for the first time since 2009, Peer Monitor data show.

Professional rules prohibit lawyers from charging “unconscionable” or “unreasonable” rates. But that doesn’t preclude clients from paying any price they perceive as valuable, said Jacqueline Vinaccia, a San Diego-based lawyer who testifies on lawyer fee disputes.

Lawyers’ fees are usually only contested when they will be paid by a third party.

That happened recently with Hogan Lovells’ Katyal, whose nearly $2,500 an hour fee was contested in May by a US trustee overseeing a bankruptcy case involving a Johnson & Johnson unit facing claims its talc-based powders caused cancer.

The trustee, who protects the financial interests of bankruptcy estates, argued Katyal’s fee was more than $1,000 an hour higher than rates charged by lawyers in the same case at Jones Day and Skadden Arps Slate Meagher & Flom.

A hearing on the trustee’s objection is scheduled for next week. Hogan Lovells did not respond to a request for comment on the objection.

Vinaccia said the firm’s options will be to reduce its fee, withdraw from the case, or argue the levy is reasonable, most likely based on Katyal’s extensive experience arguing appeals.

Still, the hourly rate shows just how valuable the most prestigious lawyers’ time can be—even compared to their highly compensated competitors.

“If the argument is that Jones Day and Skadden Arps are less expensive, then you’re already talking about the cream of the crop, the top-of-the-barrel law firms,” Vinaccia said. “I can’t imagine a case in which I might argue those two firms are more reasonable than the rates I’m dealing with.”

Worth Your Time

On Cravath: Cravath Swaine & Moore is heading to Washington, opening its first new office since 1973 by hiring former heads of the U.S. Securities and Exchange Commission and Federal Deposit Insurance Corporation. Meghan Tribe reports the move comes as Big Law firms are looking to add federal government expertise as clients face more regulatory scrutiny.

On Big Law Promotions: It’s rare that associates get promotions to partner in June, but Camille Vasquez is now a Brown Rudnick partner after she shot to fame representing Johnny Depp in his defamation trial against ex-wife Amber Heard.

On Working From Home: I spoke this week with Quinn Emanuel’s John Quinn about why he thinks law firm life is never going back to the office-first culture that was upset by the pandemic. Listen to the podcast here.



00:00:00

That's it for this week! Thanks for reading and please send me your thoughts, critiques, and tips.

To contact the reporter on this story: Roy Strom in Chicago at rstrom@bloomberglaw.com

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Documents

Trustee's Objection

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EXHIBIT 3

Rainbow Sandals - Benjamin Haber Timesheet

Date:	Hours:	Description	Defendant	Atty	Case Total:
06/07/24	0.7	Review case file; e-mail re: opposing counsel (OC) re: case status	Rainbow Sandals	BH	0.7
06/12/24	1	Review and edit settlement agreement; confer with team re: same	Rainbow Sandals	BH	1.7
06/13/24	0.2	Review/edit joint statement	Rainbow Sandals	BH	1.9
08/07/24	0.3	Review notes from call with client; confer with team re: same	Rainbow Sandals	BH	2.2
08/12/24	0.5	Review edits from OC	Rainbow Sandals	BH	2.7
09/18/24	0.2	Review/edit joint statement	Rainbow Sandals	BH	2.9
09/20/24	0.2	Review minute order	Rainbow Sandals	BH	3.1
09/24/24	0.5	Call with client; confer with team re: same	Rainbow Sandals	BH	3.6
12/19/24	0.5	Confer with team re: settlement and case	Rainbow Sandals	BH	4.1
01/02/25	0.81	Additional redlines to long-form agreement; e-mail to OC re: same	Rainbow Sandals	BH	4.9
02/12/25	0.3	Meeting with team re: settlement and case status	Rainbow Sandals	BH	5.2
03/12/25	0.5	Review additional edits to settlement agreement; confer with team re: same; e-mail to OC re: same	Rainbow Sandals	BH	5.7
03/13/25	0.3	Review joint statement; emails to team re: same	Rainbow Sandals	BH	6.0
03/19/25	0.5	Review long-form; finalize for signature	Rainbow Sandals	BH	6.5
05/09/25	1.2	Review/edit motion for preliminary approval (MPA)	Rainbow Sandals	BH	7.7
05/12/25	0.5	E-mails to team and OC re: long-form settlement agreement and reserving hearing date on MPA	Rainbow Sandals	BH	8.2
07/09/25	2.2	Additional edits to MPA; confer with team re: filing; e-mail to OC re: drafts of MPA	Rainbow Sandals	BH	10.4
07/16/25	3	Review edits from OC re: MPA; confer with team re: same; prepare filing	Rainbow Sandals	BH	13.4
07/17/25	1	Finalize edits to MPA; finalize filing	Rainbow Sandals	BH	14.4
07/23/25	0.3	E-mails to team re: status conference and filings	Rainbow Sandals	BH	14.7
09/04/25	0.4	Review tentative ruling re: MPA; confer with team and OC re: same	Rainbow Sandals	BH	15.1
10/15/25	0.2	Review sub of attorney	Rainbow Sandals	BH	15.3
01/07/26	0.3	Confer with team re: amendment	Rainbow Sandals	BH	15.6
02/06/26	0.6	Review edits to amendment; revise calculations re: payouts; confer with team re: same	Rainbow Sandals	BH	16.2
02/20/26	0.5	Review/edit supplemental briefing for MPA	Rainbow Sandals	BH	16.7
03/04/26	0.4	Review tentative ruling re: MPA; confer with team re: same	Rainbow Sandals	BH	17.1
06/22/26	0.7	Review and confer with team re: supplemental briefing for MPA	Rainbow Sandals	BH	17.8
07/02/26	0.3	Review supplemental briefing	Rainbow Sandals	BH	18.1
07/15/26	0.2	Review tentative ruling	Rainbow Sandals	BH	18.3
11/11/26	0.5	Review/edit motion for final approval	Rainbow Sandals	BH	18.8
11/13/26	0.4	Review OC's edits to MFA; confer with team re: same	Rainbow Sandals	BH	19.2
11/16/26	1	Review and finalize MFA for filing	Rainbow Sandals	BH	20.2

Daniel Kramer's Timesheet - Rainbow Sandals Inc.

Date:	Hours:	Task Code	Description	Defendant	Atty	Case Total:
09/24/24	0.2	L120	Review client call	Rainbow Sandals, Inc.	DK	0.2
02/04/25	0.2	L110	Review email correspondence	Rainbow Sandals, Inc.	DK	0.4
03/13/25	0.3	L160	Cont Review Settlement Agreement	Rainbow Sandals, Inc.	DK	0.7
03/19/25	0.2	L160	Cont Review Settlement Agreement	Rainbow Sandals, Inc.	DK	0.9
05/01/25	0.2	L110	Review email correspondence	Rainbow Sandals, Inc.	DK	1.1
05/12/25	0.4	L210	Review Draft Motion for Preliminary Approval	Rainbow Sandals, Inc.	DK	1.5
05/29/25	0.8	L210	Draft Joint Statement	Rainbow Sandals, Inc.	DK	2.3
06/03/25	0.2	L110	Review email correspondence	Rainbow Sandals, Inc.	DK	2.5
7/10/2025	1	L210	Draft Joint Statement	Rainbow Sandals, Inc.	DK	3.5
7/16/2025	0.3	L210	Review Draft Motion for Preliminary Approval	Rainbow Sandals, Inc.	DK	3.8
7/17/2025	0.4	L210	Cont Review Draft Motion for Preliminary Approval	Rainbow Sandals, Inc.	DK	4.2

7/29/2025	0.2	L110	Review email correspondence	Rainbow Sandals, Inc.	DK	4.4
9/4/2025	0.2	L210	Review Tentative Ruling re MPA	Rainbow Sandals, Inc.	DK	4.6
10/15/2025	0.2	L210	Review Substitution of Attorney	Rainbow Sandals, Inc.	DK	4.8
10/24/2025	0.3	L210	Draft Internal Email	Rainbow Sandals, Inc.	DK	5.1
1/20/2026	0.3	L210	Draft Internal Email Correspondence	Rainbow Sandals, Inc.	DK	5.4
1/23/2026	0.3	L210	Draft Internal Email Correspondence	Rainbow Sandals, Inc.	DK	5.7
1/26/2026	0.2	L210	Review email correspondence	Rainbow Sandals, Inc.	DK	5.9
2/19/2026	0.2	L210	Review email correspondence	Rainbow Sandals, Inc.	DK	6.1
3/5/2026	0.4	L210	Review Tentative Ruling re MPA	Rainbow Sandals, Inc.	DK	6.5
7/2/2026	0.2	L210	Review Supp Docs in support of MPA	Rainbow Sandals, Inc.	DK	6.7
7/17/2026	0.3	L210	Review email re MPA	Rainbow Sandals, Inc.	DK	7.0
8/6/2026	0.3	L210	Review email correspondence	Rainbow Sandals, Inc.	DK	7.3
9/28/2026	0.2	L160	Review email correspondence	Rainbow Sandals, Inc.	DK	7.5
11/10/2026	1	L210	Draft Motion for Final Approval	Rainbow Sandals, Inc.	DK	8.5
11/11/2026	0.7	L210	Cont Draft Motion for Final Approval	Rainbow Sandals, Inc.	DK	9.2

Angela Leong's Timesheet - Rainbow Sandals, Inc.

Date:	Hours:	Task Code	Description	Defendant	Atty	Case Total:
06/04/25	0.8	L110	Review case file and prior statements; prepare for status conference	Rainbow Sandals, Inc.	AL	0.8
06/05/25	1	L110	Appearance for status conference and recap e-mail	Rainbow Sandals, Inc.	AL	1.8

Rainbow Sandals - Christina Le Timesheet

Date	Time Input (Hours)	Description of Work
9/20/2022	1.1	Review file/intake and determine claims for filing.
9/28/2022	0.6	Review draft of class action complaint prepared.
9/28/2022	0.4	Review draft of LWDA letter prepared.
12/15/2022	0.4	Review draft of First Amended Complaint adding PAGA claim prepared.
12/15/2022	0.4	Emails with Defendant's counsel re draft of FAC.
12/20/2022	0.3	Emails with Defendant's counsel re proposed mediators for matter.
12/22/2022	0.4	Emails with Defendant's counsel re proposed mediators for matter.
12/27/2022	0.1	Review Notice of Posting Jury Fees
1/5/2023	0.4	Emails with Defendant's counsel re proposed mediators for matter.
1/6/2023	0.3	Emails with Defendant's counsel re proposed mediators for matter.
1/6/2023	0.5	Review and revise Joint ISC Statement
1/10/2023	0.2	Review and finalize Notice of Court's 1/09/2023 Minute Order Continuing Status Conference
1/24/2023	0.2	Review client's single plaintiff settlement agreement to ensure client's wage and hour claims are
2/13/2023	0.4	Review emails with Defendant's counsel re failure to answer First Amended Complaint and meet
2/14/2023	0.2	Review Defendant's Answer to First Amended Complaint
2/27/2023	0.4	Continue review of client's single plaintiff settlement agreement to ensure client's wage and hou
3/16/2023	0.2	Review letter of representation of new counsel for Defendant
3/20/2023	0.4	Emails with Defendant's counsel meeting and conferring about current status of case
3/24/2023	0.4	Emails with Defendant's counsel re proposed mediators for matter and case status.
3/29/2023	0.3	Further emails with Defendant's counsel re proposed mediators for matter and case status.
4/3/2023	0.3	Further emails with Defendant's counsel re proposed mediators for matter and case status.
4/10/2023	0.3	Confer with Defendant's counsel via email re dates for mediation with selected mediator
5/5/2023	0.3	Review and revise Joint ISC Statement
8/12/2023	0.3	Communications with client re preparation for upcoming mediation.
8/16/2023	0.2	Review and final informal discovery request letter to Defendant
8/25/2023	0.3	Additional communications with client re preparation for upcoming mediation.
8/29/2023	0.2	Emails with Defendant's counsel re information needed for upcoming mediation.
8/30/2023	0.3	Review asset search report no. 1 returned for Defendant
9/5/2023	0.2	Emails with Defendant's counsel re information needed for upcoming mediation.
9/6/2023	0.2	Emails with Defendant's counsel re information needed for upcoming mediation.

9/6/2023	0.3	Communications with client re preparation for upcoming mediation.
9/7/2023	0.3	Review asset search report no. 2 returned for Defendant
9/7/2023	0.2	Emails with Defendant's counsel re information needed for upcoming mediation.
9/18/2023	0.4	Review materials received from Defendant's counsel for mediation
9/21/2023	0.2	Review Notice of Court Case Re-Assignment
9/24/2023	2.6	Review the case file, mediation analysis, and mediation brief draft to complete the brief and prep
9/25/2023	3.2	Finalize the mediation brief
9/26/2023	8.7	Prepare for and attend mediation with mediator Monique Ngo-Bonnici.
10/13/2023	0.3	Review and revise Joint ISC Statement
1/25/2024	0.5	Review of draft long form agreement for settlement.
Total Hours	**26.9**	

Rainbow Sandals - Karen L. Wallace Timesheet					
Date	**Hours**	**Decription**	**Client Matter**	**Attorney**	**Case Total**
6/19/2026	1.6	Draft/revise memo re order; confer w/YV re same	Rainbow Sandals	KW	1.6
6/22/2026	7.1	Review/revise supp papers; confer w/CH, AW re same	Rainbow Sandals	KW	8.7
6/23/2026	2.9	Draft/revise supp papers; communicate w/team, OC re same	Rainbow Sandals	KW	11.6
6/26/2026	0.3	Review/revise docs; communicate w/OC re same	Rainbow Sandals	KW	11.9
7/2/2026	3.4	Review/revise memo re supp docs; communicate w/CH re same	Rainbow Sandals	KW	15.3
7/6/2026	0.1	Review/revise Supp. Wilcox Decl. ISO MPA; communicate w/CH re same	Rainbow Sandals	KW	15.4
7/16/2026	0.7	Review/revise PO, Class Notice; communicate w/YV re same	Rainbow Sandals	KW	16.1
7/22/2026	1.5	Review/revise PO, Class Notice; communicate w/DR re same; review/revise Notice of Ruling, communicate w/YV re same	Rainbow Sandals	KW	17.6
7/28/2026	0.2	Review/revise PO; communicate w/DR re same	Rainbow Sandals	KW	17.8
8/6/2026	0.2	Review/revise Notice re Order: communicate w/DR re same	Rainbow Sandals	KW	18
11/3/2026	0.7	Review/revise Admin Decl; communicate w/ILYM re same	Rainbow Sandals	KW	18.7
11/5/2026	1.2	Draft/revise MFA; communicate w/DK Team re same	Rainbow Sandals	KW	19.9
11/6/2026	1.2	Draft/revise MFA, Haber Decl ISO	Rainbow Sandals	KW	21.1
11/9/2026	2.5	Draft/revise MFA, docs ISO	Rainbow Sandals	KW	23.6

Rainbow Sandals - Lucy Nguyen's Detailed Billing

Task Description	Hours
Review settlement agreement, proposed amendment, and relevant case materials to evaluate necessary revisions.	1.5
Analyze settlement provisions requiring amendment and applicable procedural requirements.	1.2
Draft amendment to the Settlement Agreement, including revisions to pertinent settlement provisions.	2.5
Review and revise amendment to ensure consistency with the Settlement Agreement.	1.1
Review court filings and relevant materials in preparation for supplemental filing.	1.2
Conduct legal research and analysis concerning supplemental filing requirements and settlement approval.	1.0
Draft supplemental filing addressing settlement issues and supporting approval.	2.2
Review, revise, and finalize supplemental filing and supporting documents.	1.6
TOTAL	12.3

Rainbow Sandals - Alan Wilcox Timesheet

Date	Hours	Description	Defendant	Attorney	Case Total
6/22/2026	0.70	Discussed supplemental filings	Rainbow Sandals, Inc.	AW	0.70
7/16/2026	0.50	Prepared for and attended the continued MPA hearing	Rainbow Sandals, Inc.	AW	1.20
7/25/2026		Reviewed the Court's tentative ruling on the MPA, drafted an amendment to the settlement agreement per the Court's ruling, revised class notice, and drafted supplemental MPA filings.	Rainbow Sandals, Inc.	AW	1.20
2/17/2026	0.60	Reviewed opposing counsel's changes to the settlement agreement and responded.	Rainbow Sandals, Inc.	AW	1.80
2/20/2026	0.60	Reviewed and revised the supplemental declaration in support of MPA.	Rainbow Sandals, Inc.	AW	2.40
3/5/2026	1.90	Prepared for and attended the continued MPA hearing.	Rainbow Sandals, Inc.	AW	4.30

Rainbow Sandals - Conor Gomez Timesheet

Date	Hours	Description	Defendant	Attorney	Case Total
1/22/2026	2.5	Review Redlines to MPA, PO, SA per court's tentative	Rainbow Sandals	CG	2.5

EXHIBIT 4

Wilshire Law Firm, PLC

Transaction Detail by Account

All Transactions

Accrual Basis

Type	Date	Num	Memo	Description	Amount	Balance
Mediation Fees						
	04/12/2023	01/25/2024	Mediation Fee - Signature Resolution, LLC	50% Mediation Fee	$7,950.00	$7,950.00
Total MEDIATION FEES					$7,950.00	$7,950.00
Consultant Fees						
	10/17/2023	8811	Consultant Fee - Berger Consulting Group, LLC	15.40 hours of work	$7,700.00	$7,700.00
	9/7/2023	INV94336-01	Consultant Fee - USA Express Legal & Investigation	Asset Search Stage 1 & 2	$1,825.00	$9,525.00
Total CONSULTANT FEES					$9,525.00	$9,525.00
Filing Fees						
	09/30/2022		Filing Fee - One Legal LLC	Complaint	$1,492.52	$1,492.52
	09/30/2022		Filing Fee - Department of Industrial Relations	PAGA Notice	$75.00	$1,567.52
	10/20/2022	51886	Process Service Fee - Valpro Attorney Services, LLC	Serve: Rainbow Sandals, Inc	$157.00	$1,724.52
	10/21/2022	51924	Filing Fee - Valpro Attorney Services, LLC	POS	$45.00	$1,769.52
	12/15/2022		Filing Fee - One Legal LLC	Amended Complaint	$16.21	$1,785.73
	12/28/2022		Filing Fee - One Legal LLC	Jury Fees	$170.64	$1,956.37
	01/06/2023		Filing Fee - One Legal LLC	Status Conference Statement	$16.21	$1,972.58
	01/10/2023		Filing Fee - One Legal LLC	Notice	$16.21	$1,988.79
	05/05/2023		Filing Fee - One Legal LLC	Joint Satement	$16.68	$2,005.47
	05/09/2023		Filing Fee - One Legal LLC	Notice	$16.68	$2,022.15
	09/26/2023	21263345	Filing Fee - One Legal LLC	Notice	$16.68	$2,038.83
	10/13/2023	21421141	Filing Fee - One Legal LLC		$16.68	$2,055.51
	02/28/2024	22339755	Filing Fee - One Legal LLC	SCS	$17.71	$2,073.22
	06/06/2024	22339755(2)	Filing Fee - One Legal LLC		$1.00	$2,074.22
	06/13/2024	23120747	Filing Fee - One Legal LLC	SCS	$18.74	$2,092.96
	09/19/2024	23761844	Filing Fee - One Legal LLC	Stip and Order	$40.47	$2,133.43
	10/07/2024	23845976	Filing Fee - One Legal LLC	Notice	$18.79	$2,152.22
	01/03/2025	24429910	Filing Fee - One Legal LLC	Stip and Order	$41.51	$2,193.73
	03/13/2025	24923093	Filing Fee - One Legal LLC	SCS	$19.82	$2,213.55
	05/30/2025	25493344	Filing Fee - One Legal LLC	SCS	$19.82	$2,233.37
	07/10/2025	CC073125TA-1456	Filing Fee - One Legal LLC	SCS	$19.82	$2,253.19
	07/17/2025	CC073125TA-3737	Document Purchase - Orange County Superior Court	Document Purchase	$7.50	$2,260.69
	07/24/2025	CC073125TA-3148	Filing Fee - One Legal LLC	Motion	$82.81	$2,343.50
	07/24/2025	CC073125TA-3803	Document Purchase - Orange County Superior Court	Document Purchase	$7.50	$2,351.00
	08/01/2025	CC083125TA-0948	Filing Fee - One Legal LLC	Notice	$19.82	$2,370.82
	08/20/2025	CC083125TA-1715	Filing Fee - One Legal LLC	Notice	$19.82	$2,390.64
	02/20/2026	CC022826TA-2151	Filing Fee - One Legal LLC	Declaration	$20.91	$2,411.55
	07/06/2026	CC073126TA-0196	Filing Fee - One Legal LLC	Declaration	$20.91	$2,432.46
	07/06/2026	CC073126TA-0228	Filing Fee - One Legal LLC	MPA	$119.03	$2,551.49
	07/07/2026	CC073126TA-0614	Filing Fee - One Legal LLC	Declaration	$20.91	$2,572.40
	07/23/2026	CC073126TA-1941	Filing Fee - One Legal LLC	Notice	$20.91	$2,593.31
	07/24/2026	CC073126TA-2283	Document Purchase - Orange County Superior Court	Document Purchase	$7.50	$2,600.81
	08/06/2026	CC083126TA-0478	Filing Fee - One Legal LLC	Proposed Order	$20.91	$2,621.72
	8/7/2026	CC083126TA-0529	Filing Fee - One Legal LLC	Notice	$20.91	$2,642.63
Total FILING FEES					$2,642.63	$2,642.63
TOTAL					**$20,117.63**	**$20,117.63**