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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES
CENTRAL DISTRICT**

**SALVADOR RODRIGUEZ, GERMAN
RODRIGUEZ**, on Behalf of Themselves and
All Other Current and Former Employees
Similarly Situated,

Plaintiffs,

v.

WNU LLC DBA PAPA JOHNS, a
Washington Limited Liability Company,
PAUL URBINA, BRISIA OCHOA,
Individuals, and **DOES 1 to 50, Inclusive.**

Defendants.

CASE NO. 23STCV28934

*Assigned for All Purposes to the Honorable
William F. Highberger*

Dept. No. 10

**DECLARATION OF JONATHAN D.
KANTOR IN SUPPORT OF
PLAINTIFFS' UNOPPOSED MOTION
FOR FINAL APPROVAL OF CLASS
SETTLEMENT**

Hearing Date: February 24, 2026

Hearing Time: 11:00 AM

Place: Dept. 10

Action Filed: November 22, 2023

Trial Date: Not Set

1 **I, JONATHAN D. KANTOR, declare as follows:**

2 1. I make this declaration in support of Plaintiffs' Unopposed Motion for Final
3 Approval of Class and PAGA Action Settlement. I am an attorney licensed to practice in all
4 courts in the State of California, and I am also admitted to practice before the United States
5 District Court for the Central District, and have been an active member of the California State
6 Bar since 2016. The facts contained herein are based upon my own personal knowledge. If
7 called upon to testify, I would testify to these same facts.

8 2. I am employed as an attorney in the Law Office of Eli M. Kantor and have
9 worked on all aspects of *Salvador Rodriguez v. WNU LLC dba Papa Johns, et al., Los Angeles*
10 *County Superior Court Case No. 23STCV28934.*

11 3. I graduated from UCLA School of Law in 2016. I have been a Labor and
12 Employment lawyer for the past 10 years, since 2016, and have handled numerous cases in
13 all aspects of employment and labor law, representing both employers and employees,
14 plaintiffs and defendants, including, but not limited to, numerous individual Federal and
15 State wage and hour cases and countless State Labor Commissioner cases and U.S.
16 Department of Labor administrative audits, as well as wage and hour class actions.
17 Significantly, Judge Stuart Rice approved a wage and hour Class Action Settlement in
18 *Patrick Shepherd v. Reliable Liquid Transport, Inc. et al., LASC Case No. 20STCV08434,*
19 *where I was approved as Plaintiff's Class Counsel, and was awarded an hourly rate of \$450*
20 *per hour.*

21 4. In addition to wage and hour matters, I have handled wrongful discharge
22 litigation, Fair Employment and Housing Act discrimination cases, and various other
23 employment issues.

24 5. I am a member of the Labor Law Sections of the California Bar, Los Angeles
25 County Bar and Beverly Hills Bar Associations.

6. My normal hourly rate is \$450.00 an hour. This rate is based on the Laffey Matrix which states that a lawyer with 8-10 years of experience is entitled to \$839.00 per hour (See Exhibit 1 – Laffey Matrix). This rate is also supported by the Fitzpatrick Matrix published by the U.S. Attorney's Office which states that a Lawyer with 10 years of experience is entitled to \$723.00 per hour. (See Exhibit 2 – The Fitzpatrick Matrix). However, the Law Offices of Eli Kantor will be restricting their fee request to \$151,984.80 or one-third of the Maximum Settlement Amount, despite the substantial risk it bore in this case, which includes \$80,662.50 for my attorney's fees of 179.25 hours at \$450 per hour. My lodestar in this matter is approximately \$80,662.50, with a total of 179.25 hours expended.

Preliminary Investigation

7. In this regard, I spent 179.25 hours on this case as follows: I spent 30 hours investigating the claims, interviewing witnesses, researching the legal issues, drafting the PAGA letter and drafting the Complaint.

Litigation

8. I spent 19.75 hours researching issues regarding class size, researching arbitration agreements, and the size of the class. I also talked to Defendants' counsel about various issues regarding how many class members signed arbitration agreements, whether or not drivers were outside the class or bound by the arbitration agreement, and how large the class was, picking a mediator, and reserving a mediation date.

Informal Discovery

9. I spent 28.75 hours preparing joint status reports and attending joint status conferences, preparing a wish list for informal discovery, engaging in informal discovery, reviewing the documents and data provided by Defendants, communicating with the

1 Defendants' attorneys about the data they turned over, researching experts and talking to our
2 expert, Eric Lietzow.

3
4 **Mediation**

5 10. I spent 30 hours drafting the Mediation brief, preparing for the mediation, and
6 attending the mediation.

7 **Post-Mediation**

8
9 11. I spent 70.75 hours drafting the settlement agreement and negotiating the
10 language with Defendants' counsel; drafting the motion for preliminary approval of class
11 action settlement; attending the hearing; working with the Class Administrator on various
12 issues such as the notice packet, the dates for mailing; reviewing the class data, redirecting
13 putative class members to the class administrator; and drafting the motion for final approval
14 of the class action settlement.

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

17
18 Dated: January 28, 2026



19 JONATHAN KANTOR
20 Attorney for Plaintiffs SALVADOR
21 RODRIGUEZ, GERMAN RODRIGUEZ
22 and All Others Similarly Situated
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EXHIBIT 1

LAFFEY MATRIX

[History](#)
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[See the Matrix](#)
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			Years Out of Law School *				
Year	Adjustmt Factor**	Paralegal/ Law Clerk	1-3	4-7	8-10	11-19	20 +
6/01/24- 5/31/25	1.080182	\$258	\$473	\$581	\$839	\$948	\$1141
6/01/23- 5/31/24	1.059295	\$239	\$437	\$538	\$777	\$878	\$1057
6/01/22- 5/31/23	1.085091	\$225	\$413	\$508	\$733	\$829	\$997
6/01/21- 5/31/22	1.006053	\$208	\$381	\$468	\$676	\$764	\$919
6/01/20- 5/31/21	1.015894	\$206	\$378	\$465	\$672	\$759	\$914
6/01/19- 5/31/20	1.0049	\$203	\$372	\$458	\$661	\$747	\$899
6/01/18- 5/31/19	1.0350	\$202	\$371	\$455	\$658	\$742	\$894
6/01/17- 5/31/18	1.0463	\$196	\$359	\$440	\$636	\$717	\$864
6/01/16- 5/31/17	1.0369	\$187	\$343	\$421	\$608	\$685	\$826
6/01/15- 5/31/16	1.0089	\$180	\$331	\$406	\$586	\$661	\$796
6/01/14- 5/31/15	1.0235	\$179	\$328	\$402	\$581	\$655	\$789
6/01/13- 5/31/14	1.0244	\$175	\$320	\$393	\$567	\$640	\$771
6/01/12- 5/31/13	1.0258	\$170	\$312	\$383	\$554	\$625	\$753
6/01/11- 5/31/12	1.0352	\$166	\$305	\$374	\$540	\$609	\$734
6/01/10- 5/31/11	1.0337	\$161	\$294	\$361	\$522	\$589	\$709
6/01/09- 5/31/10	1.0220	\$155	\$285	\$349	\$505	\$569	\$686
6/01/08- 5/31/09	1.0399	\$152	\$279	\$342	\$494	\$557	\$671
6/01/07-5/31/08	1.0516	\$146	\$268	\$329	\$475	\$536	\$645
6/01/06-5/31/07	1.0256	\$139	\$255	\$313	\$452	\$509	\$614
6/1/05-5/31/06	1.0427	\$136	\$249	\$305	\$441	\$497	\$598
6/1/04-5/31/05	1.0455	\$130	\$239	\$293	\$423	\$476	\$574

6/1/03-6/1/04	1.0507	\$124	\$228	\$280	\$405	\$456	\$549
6/1/02-5/31/03	1.0727	\$118	\$217	\$267	\$385	\$434	\$522
6/1/01-5/31/02	1.0407	\$110	\$203	\$249	\$359	\$404	\$487
6/1/00-5/31/01	1.0529	\$106	\$195	\$239	\$345	\$388	\$468
6/1/99-5/31/00	1.0491	\$101	\$185	\$227	\$328	\$369	\$444
6/1/98-5/31/99	1.0439	\$96	\$176	\$216	\$312	\$352	\$424
6/1/97-5/31/98	1.0419	\$92	\$169	\$207	\$299	\$337	\$406
6/1/96-5/31/97	1.0396	\$88	\$162	\$198	\$287	\$323	\$389
6/1/95-5/31/96	1.032	\$85	\$155	\$191	\$276	\$311	\$375
6/1/94-5/31/95	1.0237	\$82	\$151	\$185	\$267	\$301	\$363

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

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

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

Exhibit 2

THE FITZPATRICK MATRIX

Hourly Rates (\$) for Legal Fees for Complex Federal Litigation in the District of Columbia

Years Exp. / Billing Yr.	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
35+	535	563	591	619	647	675	703	731	736	760	807	864	933
34	534	562	590	618	646	674	702	729	734	758	805	862	931
33	532	560	588	616	644	672	700	728	733	757	804	861	930
32	530	558	586	614	642	670	698	726	730	754	801	858	927
31	527	555	583	611	639	667	695	723	728	752	799	856	924
30	524	552	580	608	636	664	692	720	725	749	795	851	919
29	521	549	577	605	633	661	689	717	721	745	791	847	915
28	517	545	573	601	629	657	685	713	717	741	787	843	910
27	512	540	568	596	624	652	680	708	713	736	782	838	905
26	508	536	564	592	620	648	676	704	708	731	776	831	897
25	502	530	558	586	614	642	670	698	703	726	771	826	892
24	497	525	553	581	609	637	665	693	697	720	765	819	885
23	491	519	547	575	603	630	658	686	691	714	758	812	877
22	484	512	540	568	596	624	652	680	684	707	751	804	868
21	477	505	533	561	589	617	645	673	677	699	742	795	859
20	470	498	526	553	581	609	637	665	670	692	735	787	850
19	462	490	518	546	574	602	630	658	662	684	726	778	840
18	453	481	509	537	565	593	621	649	653	675	717	768	829
17	445	473	500	528	556	584	612	640	645	666	707	757	818
16	435	463	491	519	547	575	603	631	635	656	697	746	806
15	426	454	482	510	538	566	593	621	626	647	687	736	795
14	416	443	471	499	527	555	583	611	615	635	674	722	780
13	405	433	461	489	517	545	573	601	605	625	664	711	768
12	394	422	450	478	506	534	562	590	594	614	652	698	754
11	382	410	438	466	494	522	550	578	582	601	638	683	738
10	371	399	427	455	483	510	538	566	570	589	625	669	723
9	358	386	414	442	470	498	526	554	558	576	612	655	707
8	345	373	401	429	457	485	513	541	545	563	598	640	691
7	332	360	388	416	444	472	500	528	532	550	584	625	675
6	319	347	375	403	431	458	486	514	518	535	568	608	657
5	305	332	360	388	416	444	472	500	504	521	553	592	639
4	290	318	346	374	402	430	458	486	489	505	536	574	620
3	275	303	331	359	387	415	443	471	474	490	520	557	602
2	260	287	315	343	371	399	427	455	458	473	502	538	581
1	244	272	300	328	356	384	412	439	442	457	485	519	561
0	227	255	283	311	339	367	395	423	426	440	467	500	540
P*	130	140	150	160	169	179	189	199	200	207	220	236	255

* = Paralegals/Law Clerks

Explanatory Notes

1. This matrix of hourly rates for attorneys of varying experience levels and paralegals/law clerks has been prepared to assist with resolving requests for attorney's fees in complex civil cases in District of Columbia federal courts handled by the Civil Division of the United States Attorney's Office for the District of Columbia. It has been developed to provide "a reliable assessment of fees charged for complex federal litigation in the District [of Columbia]," as the United States Court of Appeals for the District of Columbia Circuit urged. *DL v. District of Columbia*, 924 F.3d 585, 595 (D.C. Cir. 2019). The matrix has not been adopted by the Department of Justice generally for use outside the District of Columbia, nor has it been adopted by other Department of Justice components.
2. The matrix is intended for use in cases in which a fee-shifting statute permits the prevailing party to recover "reasonable" attorney's fees. *E.g.*, 42 U.S.C. § 2000e-5(k) (Title VII of the 1964 Civil Rights Act); 5 U.S.C. § 552(a)(4)(E) (Freedom of Information Act); 28 U.S.C. § 2412(b). A "reasonable fee" is a fee that is sufficient to attract an adequate supply of capable counsel for meritorious cases. *Perdue v. Kenny A. ex rel. Winn*, 559 U.S. 542, 552 (2010). The matrix is not intended for use in cases in which the hourly rate is limited by statute. *E.g.*, 28 U.S.C. § 2412(d).
3. For matters in which a prevailing party agrees to payment pursuant to this fee matrix, the United States Attorney's Office will not request that a prevailing party offer the additional evidence that the law otherwise requires. *See, e.g., Eley v. District of Columbia*, 793 F.3d 97, 104 (D.C. Cir. 2015) (quoting *Covington v. District of Columbia*, 57 F.3d 1101, 1109 (D.C. Cir. 1995) (requiring "evidence that [the] 'requested rates are in line with those prevailing in the community for similar services'")).
4. The years in the column on the left refer to an attorney's years of experience practicing law. Normally, an attorney's experience will be calculated based on the number of years since an attorney graduated from law school. If the year of law school graduation is unavailable, the year of bar passage should be used instead. Thus, an attorney who graduated from law school in the same year as the work for which compensation is sought has 0 years of experience. For all work beginning on January 1 of the calendar year following graduation (or bar admission), the attorney will have 1 year of experience. (For example, an attorney who graduated from law school on May 30 will have 0 years of experience until December 31 of that same calendar year. As of January 1, all work charged will be computed as performed by an attorney with 1 year of experience.) Adjustments may be necessary if an attorney did not follow a typical career progression or was effectively performing law clerk work. *See, e.g., EPIC v. Dep't of Homeland Sec.*, 999 F. Supp. 2d 61, 70-71 (D.D.C. 2013) (attorney not admitted to bar compensated at "Paralegals & Law Clerks" rate).
5. The data for this matrix was gathered from the dockets of cases litigated in the U.S. District Court for the District of Columbia using the following search in July 2020 in Bloomberg Law: keywords ("motion n/5 fees AND attorney!") + filing type ("brief," "motion," or "order") + date ("May 31, 2013 – May 31, 2020" under "Entries (Docket and Documents)"). This returned a list of 781 cases. Of those, cases were excluded if there was no motion for fees filed, the motions for fees lacked necessary information, or the motions involved fees not based on hourly rates, involved rates explicitly or implicitly based on an existing fee matrix, involved rates explicitly or implicitly subject to statutory fee caps (e.g., cases subject to the Equal Access to Justice Act (EAJA), 28 U.S.C. § 2412(d)), or used lower rates prescribed by case law (e.g., *Eley*, 793 F.3d at 105 (Individuals with Disabilities in Education Act cases)). After these excisions, 86 cases, many of which included data for multiple billers (and 2 of which only provided hourly rate data for paralegals), remained.

6. The cases used to generate this matrix constitute complex federal litigation—which caselaw establishes as encompassing a broad range of matters tried in federal court. *E.g.*, *Reed v. District of Columbia*, 843 F.3d 517, 527-29 (D.C. Cir. 2016) (Tatel, J., concurring) (noting that cases arising under the Freedom of Information Act, Title VII, the Americans with Disabilities Act, Constitutional Amendments, antitrust statutes, and others have been deemed complex, and even “relatively small” cases can constitute complex federal litigation, as they too require “specialized legal skills” and can involve “complex organizations,” such as “large companies”); *Miller v. Holzmann*, 575 F. Supp. 2d 2, 14-16, 17 (D.D.C. 2008) (prevailing market rates for complex federal litigation should be determined by looking to “a diverse range of cases”). That the attorneys handling these cases asked the court to award the specified rates itself demonstrates that the rates were “adequate to attract competent counsel, [while] not produc[ing] windfalls to attorneys.” *West v. Potter*, 717 F.3d 1030, 1033 (D.C. Cir. 2013) (quoting *Blum v. Stenson*, 465 U.S. 886, 897 (1984)). As a consequence, the resulting analysis yields the “prevailing market rate[] in the relevant community” for complex litigation undertaken in federal courts in the District of Columbia. *See Blum*, 465 U.S. at 895.
7. From these 86 complex federal cases, the following information was recorded for 2013 and beyond: hourly rate, the calendar year the rate was charged, and the number of years the lawyer was out of law school when the rate was charged (or, if law school graduation year was unavailable, years since bar passage), as defined above. If the graduation or bar passage year was not stated in a motion or its exhibits, then the lawyer’s biography was researched on the internet. Although preexisting fee matrices for the District of Columbia provide for mid-year rate changes, very few lawyers in the data submitted rates that changed within a calendar year. For this reason, the matrix was modeled using one rate for each calendar year. On the occasions when a lawyer expressed an hourly rate as a range or indicated the rate had increased during the year, the midpoint of the two rates was recorded for that lawyer-year.
8. The matrix of attorney rates is based on 675 lawyer-year data points (one data point for each year in which a lawyer charged an hourly rate) from 419 unique lawyers from 84 unique cases. The lawyer-year data points spanned from years 2013 to 2020, from \$100 to \$1250, and from less than one year of experience to 58 years.
9. Paralegal/law clerk rates were also recorded. The following titles in the fee motions were included in the paralegal/law clerk data: law clerk, legal assistant, paralegal, senior legal assistant, senior paralegal, and student clerk. The paralegal/law clerk row is based on 108 paralegal-year data points from 42 unique cases. They spanned from 2013 to 2019 and from \$60 to \$290. (It is unclear how many unique persons are in the 108 data points because paralegals were not always identified by name.)
10. The matrix was created with separate regressions for the lawyer data and the paralegal data. For the paralegal data, simple linear least-squares regression was used with the dependent variable hourly rate and the independent variable the year the rate was charged subtracted from 2013; years were combined into one variable and subtracted from 2013 rather than modeled as separate indicator variables to constrain annual inflation to a constant, positive number. The resulting regression formula was $\text{rate} = 129.8789 + 9.902107 * (\text{year}-2013)$. For the lawyer data, least-squares regression was used with the dependent variable hourly rate and independent variables the year the rate was charged and the number of years of experience of the lawyer when the rate was charged. The year the rate was charged was subtracted from 2013 and modeled linearly as with the paralegal data. The number of years out of law school (or since year of bar passage) was modeled with both linear and squared terms, as is common in labor economics to account for non-linear wage growth (e.g., faster growth earlier in one’s career than at the end of one’s career). *See, e.g.*, Jacob Mincer, *Schooling, Experience, and Earnings* (1974). The resulting regression formula was

rate = 227.319 + 16.54492 * experience - 0.2216217 * experience ^ 2 + 27.97634 * (year-2013). Regressions were also run with log transformed rates and with a random-effect model (to account for several lawyers appearing more than once in the data), but both alternatives resulted in mostly lower rates than those reflected here; in order to minimize fee disputes, these models were therefore rejected in favor of the more generous untransformed, fixed-effect model. Rates from one case comprised 20% of the data; the regression was also run without that case, but the resulting rates were mostly lower and therefore rejected, again to minimize fee disputes.

11. The data collected for this matrix runs through 2020. To generate rates after 2020, an inflation adjustment (rounded to the nearest whole dollar) has been added. The United States Attorney's Office determined that, because courts and many parties have employed the legal services index of the Consumer Price Index to adjust attorney hourly rates for inflation, this matrix would do likewise. *E.g., Salazar v. District of Columbia*, 809 F.3d 58, 64-65 (D.C. Cir. 2015); *Eley*, 793 F.3d at 101-02; *DL*, 924 F.3d at 589-90. That was the approach followed for the years 2021 through and including 2023. However, the Bureau of Labor Statistics has now ceased consistently publishing monthly data for the legal services index of the Consumer Price Index. As an alternative, the legal services index of the Producer Price Index, which continues regularly to provide updated data, has been used to generate the rates for 2024 and thereafter.
12. This matrix was researched and prepared by Brian Fitzpatrick, the Milton R. Underwood Chair in Free Enterprise and Professor of Law at Vanderbilt Law School, with the help of his students.
13. This matrix and an alternative, preexisting matrix were extensively examined, and, based on that analysis, this matrix was the one selected for computation of the hourly rates for the attorneys' fees awarded in *J.T. v. District of Columbia*, 652 F. Supp. 3d 11 (D.D.C. 2023) (Howell, C.J.), and in *Brackett v. Mayorkas*, Civ. A. No. 17-0988, 2023 WL 5094872 (D.D.C. Aug. 9, 2023) (Boasberg, C.J.).