

1 Zachary M. Crosner (SBN 272295)
zach@crosnerlegal.com
2 Brandon Brouillette (SBN 289601)
bbrouillette@crosnerlegal.com
3 CROSNER LEGAL, PC
9440 Santa Monica Blvd, Suite 301
4 Beverly Hills, California 90210
Tel: (310) 496-5818
5 Fax: (310) 510-6429

6 Attorneys for Plaintiffs
7 (Additional Attorneys Listed on Next Page)

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF SAN JOAQUIN**

10
11 SOMALIA GOODWIN, JUAN CARLOS
12 QUEVEDO, DUSTIN JOHNSON, and JOHN
A. MCGEHEE, On behalf of the general
13 public as private attorney general,
Plaintiffs,

14
15 v.

16 SAVE MART SUPERMARKETS, LLC, a
California Limited Liability Company; and
17 DOES 1-100, inclusive,

18 Defendants.
19

Case No.: (Lead) STK-CV-UOE-2023-2062;
SCV-273343 (MCGEHEE class action) filed
in Sonoma county; SCV-273793
(MCGEHEE PAGA action) filed in Sonoma
county

**DECLARATION OF PAUL K. HAINES
IN SUPPORT OF PLAINTIFFS'
MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: August 26, 2025
Time: 9:00 a.m.
Dept.: 10D

JAMES HAWKINS APLC
James R. Hawkins (#192925)
Gregory Mauro (#222239)
Michael Calvo (#314986)
Lauren Falk (#316893)
Ava Issary (#342252)
9880 Research Drive, Suite 200
Irvine, CA 92618
Tel.: (949) 387-7200
Fax: (949) 387-6676
Email: James@jameshawkinsaplc.com
Email: Greg@jameshawkinsaplc.com
Email: Michael@jameshawkinsaplc.com
Email: Lauren@jameshawkinsaplc.com
Email: Ava@jameshawkinsaplc.com

Attorneys for Plaintiff JOHN A. MCGEHEE,

HAINES LAW GROUP, APC
Paul K. Haines (SBN 248226)
phaines@haineslawgroup.com
Sean M. Blakely (SBN 264384)
sblakely@haineslawgroup.com
Alexandra R. McIntosh (SBN 320904)
amcintosh@haineslawgroup.com
2155 Campus Drive, Suite 180
El Segundo, California 90245
Telephone: (424) 292-2350
Facsimile: (424) 292-2355

Attorneys for Plaintiff JUAN CARLOS QUEVEDO

BLUMENTHAL NORDREHAUG BHOWMIK DE BLOUW LLP
Norman B. Blumenthal (State Bar #068687)
Kyle R. Nordrehaug (State Bar #205975)
Aparajit Bhowmik (State Bar #248066)
Nicholas J. De Blouw (State Bar #280922)
2255 Calle Clara
La Jolla, CA 92037
Telephone: (858)551-1223
Facsimile: (858) 551-1232
Website: www.bamlawca.com
Blumenthal Nordrehaug Bhowmik De Blouw LLP

Attorneys for DUSTIN JOHNSON

I, Paul K. Haines, declare as follows:

2. I am a 2006 graduate of Pepperdine University School of Law, where I graduated cum laude. During law school, I worked as a law clerk for the appellate firm of Horvitz & Levy, located in Encino, California. I also spent a semester in law school working as an extern for the Honorable Edward Rafeedie, District Judge for the United States District Court for the Central District of California.

4. During my employment at Littler Mendelson, I played a significant role in the class actions that I was staffed on, as I was often the only associate staffed on such cases. In particular, I received a wide-array of wage and hour class action experience performing the following types of tasks: drafting demurrers, motions to strike and/or dismiss; removing actions from state court to federal court; drafting and responding to written discovery; drafting and opposing discovery related motions; arguing discovery related motions; drafting motions to consolidate related matters; interviewing putative class members and obtaining declarations in connection with class certification; drafting oppositions to motions for class certification; drafting motions for decertification following class certification; conducting exposure analyses to assess

1 the strengths and weaknesses of asserted claims, the likelihood of prevailing at class certification
2 and potential damages resulting from such claims; drafting mediation briefs; serving as the
3 primary contact to in-house counsel; deposing named plaintiffs and putative class members;
4 deposing retained expert witnesses; and defending the depositions of corporate witnesses. In
5 short, I played an integral role in all aspects of litigation from the inception of a matter through
6 and beyond class certification. I also supervised the work of several junior attorneys who were
7 staffed on the same wage and hour class actions.

8 5. In June 2011, I voluntarily resigned from Littler Mendelson in order to accept an
9 associate attorney position with the international law firm of Morgan, Lewis & Bockius LLP, at
10 its Los Angeles office, where I began working in July 2011. During my employment at Morgan,
11 Lewis & Bockius LLP, I worked exclusively on the defense of wage and hour class and collective
12 actions. For the vast majority of these cases, I was the only associate staffed on the matter, and I
13 performed the same job duties as described in the immediately preceding paragraph. In addition
14 to working on wage and hour class actions, I also worked on a number of “hybrid” actions
15 asserting nationwide wage and hour claims under the Fair Labor Standards Act (“FLSA”), as well
16 as California-specific claims under Rule 23 of the Rules of Civil Procedure.

17 6. In July 2012, I transitioned into litigating wage and hour class actions from the
18 Plaintiff’s side, first as a Partner with the law firm of Boren, Osher & Luftman, LLP, and since
19 February 2016, as a Shareholder of the Haines Law Group, APC. Currently, over ninety percent
20 (90%) of my practice is dedicated exclusively to the prosecution of wage and hour class actions,
21 and I am currently responsible for prosecuting over fifty (50) wage and hour class actions filed in
22 both State and Federal courts throughout California. I have been appointed as Class Counsel in
23 hundreds of wage and hour class action settlements in state and federal courts within California.
24 A few examples of the matters in which I have been appointed as Class Counsel, all of which
25 have been granted final approval, include the following: *Sanchez v. Res-Care, Inc.*, Case No.
26 BC526175, California Superior Court, County of Los Angeles, Hon. John Shepard Wiley, Jr.,
27 presiding; *Prado v. Warehouse Demo Services, Inc.*, Case No. CV14-3170 JFW (Ex), United
28 States District Court, Central District of California, Hon. John F. Walter presiding; *Tesla Motors*

1 *Wage and Hour Litigation*, JCCP 4792, California Superior Court, Santa Clara County, Hon.
2 Peter H. Kirwan presiding; *Bower v. Cycle Gear, Inc.*, Case No. CV14-2712 HSG, United States
3 District Court, Northern District of California, Hon. Haywood S. Gilliam, Jr. presiding;
4 *Longstreth v. PAQ, Inc., dba Food 4 Less*, Case No. 15CV-0206, California Superior Court,
5 County of San Luis Obispo, Hon. Charles S. Crandall presiding; *Nunez v. CompuCom Systems,*
6 *Inc.*, Case No. BC618385, California Superior Court, County of Los Angeles, Hon. John Shepard
7 Wiley, Jr. presiding; *Mansilla v. Haeco Americas Line Services, LLC, et al*, Case No. BC615310,
8 Superior Court of California, County of Los Angeles, Hon. Elihu M. Berle presiding; *Leverage,*
9 *et al v. Traeger Pellet Grills, LLC, et al*, Case No. 4:16-cv-00784-KAW, United States District
10 Court, Northern District of California, Hon. Kandis A. Westmore presiding.

11 7. I have also moved to certify and have received an order certifying a class action
12 and/or conditionally certifying a collective action, in the following cases:

- 13 • *Medeiros v. Vortex Financial Management Inc.*, Case No. 30-2013-00644741-CU-OE-
14 CXC, California Superior Court, County of Orange, Honorable Judge Gail A. Andler,
15 presiding (certifying a class of employees who were misclassified as independent
16 contractors);
- 17 • *Javine v. San Luis Ambulance Service, Inc.*, Case No. CV13-07480 BRO (SSx), United
18 States District Court, Central District of California, Honorable Judge Beverly Reid
19 O'Connell, presiding (conditionally certifying an unpaid FLSA overtime wage class);
- 20 • *Prado v. Warehouse Demo Services, Inc.*, Case No. CV14-3170 JFW (Ex), United States
21 District Court, Central District of California, Honorable Judge John F. Walter, presiding
22 (certifying a rest period violation class and conditionally certifying an FLSA unpaid
23 overtime wage class);
- 24 • *Bower v. Cycle Gear, Inc.*, Case No. CV14-2712 HSG, United States District Court,
25 Northern District of California, Honorable Judge Haywood S. Gilliam, Jr., presiding
26 (conditionally certifying an unpaid FLSA overtime wage class);
- 27 • *Vega v. Weatherford U.S., Limited Partnership*, Case No. CV14-1790-JLT, United States
28 District Court, Eastern District of California, Honorable Jennifer L. Thurston, presiding

(conditionally certifying an unpaid FLSA overtime wage class);

- *Galvan v. AMVAC Chemical Corporation*, Case No. 30-2014-00716103-CU-OE-CXC, California Superior Court, County of Orange, Honorable Judge William Claster, presiding (certifying unpaid overtime wage class and waiting time penalty class);
- *Camacho v. Residential Fire Systems, Inc.*, Case No. 30-2015-775372-CU-OE-CXC, California Superior Court, County of Orange, Honorable Glenda Sanders, presiding (certifying piece rate pay plan classes, expense reimbursement class, wage statement class, and waiting time penalties class);
- *Ontiveros v. Safelite Fulfillment, Inc., et al*, Case No. CV 15-7118-DMG (RAOx), United States District Court, Central District of California, Honorable Dolly M. Gee presiding (certifying six classes of employees for rest period violations, wage statement violations, meal period violations, and overtime and double-time violations);
- *Vazquez, et al v. Kraft Heinz Foods Company*, Case No. 16-cv-2749-WQH-BLM, United States District Court, Southern District of California, Honorable William Q. Hayes presiding (certifying six classes of employees for unpaid wages, meal period violations, wage statement violations, and waiting time penalties);
- *Caudle, et al. v. Sprint/United Management Company, et al.* Case No. C 17-06874-WHA, United States District Court, Northern District of California, Honorable William H. Alsup presiding (certifying three classes of employees for unlawful wage deduction violations, wage statement violations, and waiting time violations);
- *Staublein v. Wells Fargo Bank*, No. CIVDS1712267, San Bernardino County Superior Court, Honorable David S. Cohn presiding (certifying wage statement class);
- *Perez v. Sunbelt Rentals, Inc.* Case No. 37-2018-00026405-CU-OE-CTL, California Superior Court, County of San Diego, Honorable Eddie C. Sturgeon presiding (certifying class of employees for wage statement violations);
- *Bowlin-Burdick, et al v. Life Care Centers of America, Inc.*, Case No. BC657139, Los Angeles County Superior Court, Honorable Maren E. Nelson presiding (certifying four classes for meal period violations, rest period violations, wage statement violations, and

1 waiting time penalties);

- 2 • *McDonald, et al. v. Sierra Pacific Industries*, Case No. 191133, Shasta County Superior
3 Court, Hon. Tamara L. Wood (certifying eight classes for meal period violations, rest
4 period violations, unpaid wages, unreimbursed business expenses, wage statement
5 violations, and waiting time penalties);
- 6 • *Danica N. Keich, et al. v. U.S. Healthworks, Inc., et al.*, Case No. 37-2017-00015343-CU-
7 OE-CTL, San Diego County Superior Court, Honorable Eddie C. Sturgeon, presiding
8 (certifying classes for rest period violations, meal period violations, on-call pay violations,
9 wage statement violations, and waiting time violations);
- 10 • *George Gomez v. The Bedrock Company*, Case No. CIVDS1824255, San Bernardino
11 County Superior Court, Honorable David Cohn, presiding (certifying claims for unpaid
12 overtime and minimum wage violations, meal period violations, rest period violations,
13 wage statement violations, and waiting time penalties); and
- 14 • *Aurora Gatica v. Valley Ag, Inc. et al.*, Case No. 19CECG03018, Fresno County Superior
15 Court, Honorable Tyler D. Tharpe, presiding (certifying claims for meal period violations,
16 rest period violations, wage statement violations, and waiting time penalties).

17 8. In 2015, 2016, and 2017, Thomson Reuters recognized me as a Top Young
18 Attorney in Southern California in the annual Rising Stars Edition of Super Lawyer. This is an
19 honor awarded to no more than two-and-a-half percent of attorneys under the age of forty in
20 Southern California each year. In 2018, 2019, 2020, and 2021, Thomson Reuters recognized me
21 as a “Super Lawyer” in the annual Super Lawyer magazine, an honor awarded to no more than
22 five percent of all attorneys in Southern California each year.

23 9. As co-counsel for Plaintiffs and the proposed Settlement Class, I have been
24 intimately involved in every aspect of this case, and I believe that the proposed Settlement is a
25 favorable result for the Settlement Class.

26 10. On November 27, 2023, Plaintiff Juan Carlos Quevedo, through my office, filed a
27 wage and hour class action lawsuit entitled *Juan Carlos Quevedo v. Save Mart Supermarkets*
28 *LLC, et al.*, Contra Costa County Superior Court Case No. C23-02995 (the “*Quevedo Action*”).

1 The *Quevedo* Action alleges causes of action for failure to pay all overtime wages, meal period
2 violations, rest period violations, wage statement violations, waiting time penalties, civil penalties
3 under the Private Attorneys General Act, and unfair competition. Plaintiff Quevedo sought to
4 represent all non-exempt employees employed by Defendant during the putative class period.

5 11. After the filing of the *Quevedo* Action, I was informed that other related wage and
6 hour class and representative actions were pending against Defendants in various Courts
7 throughout the State of California, including the matters of *Somalia Goodwin v. Save Mart*
8 *Supermarkets, LLC*, Case No. STK-CV-UOE-2023-2062, which was filed on March 3, 2023
9 (“*Goodwin*”), *John A. McGehee v. Save Mart Supermarkets, LLC*; *The Save Mart Companies,*
10 *LLC.*, Case No. SCV-273343 filed on May 22, 2023 (class action), and *John A. McGehee v. Save*
11 *Mart Supermarkets, LLC*; *The Save Mart Companies, LLC.*, Case No. SCV-273793 filed on July
12 27, 2023 (PAGA action) (collectively referred to as “*McGehee*”).

13 12. The Parties reached a global class-wide settlement following mediation of these
14 related wage and hour class and representative actions.

15 13. Since undertaking representation of Plaintiff Quevedo in this litigation, my office
16 has borne the costs of litigation for more than two years without receiving any compensation to
17 date. During this time, my office has incurred \$2,168.88 in litigation costs. Attached hereto as
18 **Exhibit A** is a detailed line-item report of my firm’s costs, which include filing fees, services
19 fees, and postage.

20 14. Class Counsel is requesting attorneys’ fees of one-third of the Gross Settlement
21 Amount. Based on my experience in similar wage and hour class and representative PAGA
22 actions in California state courts, fee awards in matters such as this one generally equal about
23 one-third of the gross recovery. In this case, my firm has a lodestar of approximately \$60,305.00.
24 A general summary showing the number of hours of work performed by each attorney and
25 paralegal is set forth below. The billing rates used are reasonable in view of the evidence
26 submitted herewith.

27 ///

28 ///

Name	Rate	Hours	Pre-Multiplier Lodestar
Paul K. Haines (19th Year Attorney)	\$925	21.1	\$19,517.50
Sean M. Blakely (16th Year Attorney)	\$825	25.4	\$20,955.00
Alexandra R. McIntosh (7th Year Attorney)	\$600	30.4	\$18,240.00
Aaron Clark (Paralegal)	\$175	9.1	\$1,592.50
Total Lodestar			\$60,305.00

15. My proposed hourly rate of \$925, Mr. Blakely's proposed hourly rate of \$825, and Ms. McIntosh's proposed hourly rate of \$600 are reasonable in light of our respective skills, wage and hour class action experience, reputation, and fee awards to other attorneys of similar experience in California are in line with rates at which I and the other attorneys in my firm have been approved in other matters. Mr. Clark's proposed hourly rate of \$175 is reasonable in light of his experience and the usual hourly rate charged for similar services by paralegals in California. Furthermore, Mr. Clark meets the requirements of Business & Professions Code § 6450 *et seq.*, including qualifications and continuing education.

16. The respective hourly rates are also in line with the current *Laffey* Matrix, a true and correct copy of which is attached hereto as **Exhibit B**. The *Laffey* Matrix has been recognized by California courts as "a widely recognized compilation of attorney and paralegal rates based on various levels of experience." *Theme Promotions, Inc. v. News America Mktg. FSI, Inc.*, 731 F.Supp.2d 937, 948 (N.D. Cal. 2010); *see also Reed v. 1-800 Contacts, Inc.*, No. 12-cv-02359 JM (BGS), 2014 WL 29011 at **8-9 (S.D. Cal. Jan. 2, 2014) (cross-checking requested hourly rates against the *Laffey* Matrix and finding that "the *Laffey* matrix lends further credibility" to counsel's requested hourly rates).

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on July 23, 2025, at El Segundo, California.



Paul K. Haines

EXHIBIT A

July 23, 2025

Juan Carlos Quevedo

Additional Charges :

			<u>Qty/Price</u>	<u>Amount</u>
8/31/2023	ALL	Postage for August, 2023.	1 14.36	14.36
	ALL	Copying cost for August, 2023.	22 0.25	5.50
9/18/2023	IDLC	Filing fee for: LWDA Order #: ORD-000252217	1 75.00	75.00
9/30/2023	ALL	Postage for September, 2023.	1 29.68	29.68
	ALL	Copying cost for September, 2023.	30 0.25	7.50
11/27/2023	IDLC	First legal's filing fee for: Class action complaint, Civil case cover sheet, Original summons issued/filed Direct E-filing Order #: 5526126 Base charge + Additional charges + Adv/wit ck + Check charge	1 1,511.65	1,511.65
12/11/2023	IDLC	First legal's service fee for: Summons and complaint Process- Branch 3 days Order #: 5542890 Base charge + PDF/Ship + Fuel charge	1 123.54	123.54
	IDLC	First legal's service fee for: Summons and complaint Process-Branch 3 days Order #: 5542891 Base charge + PDF/Ship	1 55.50	55.50
12/12/2023	IDLC	First legal's filing fee for: Proof of service of summons, Proof of service of summons Direct E-filing Order #: 5544373	1 13.10	13.10

7/23/2025

			<u>Qty/Price</u>	<u>Amount</u>
		Base charge + Additional charges		
12/27/2023	IDLC	First legal's filing fee for: Jury Fees. Order #: 5526126	1 150.00	150.00
5/16/2024	ALL	First legal's service fee for: Joint Notice of Settlement and Request to Continue Case Management Conference; [Proposed] Order. Order #: 5735641 E-service *No base charge* PDF/Ship	1 8.75	8.75
	ALL	First legal's filing fee for: Joint Notice of Settlement and Request to Continue Case Management Conference; [Proposed] Order. Order #: 5735634 Direct E-filing Base charge + Additional charges + Adv/wit ck + Check charge	1 36.50	36.50
9/9/2024	IDLC	First legal's service fee for: Request to Continue Case Management Conference in Light of Class-Wide Settlement; [Proposed] Order. Order #: 5878222 *No Base Charge* E-Service PDF/Ship	1 8.75	8.75
	IDLC	First legal's filing fee for: Request to Continue Case Management Conference in Light of Class-Wide Settlement; [Proposed] Order. Order #: 5878188 Direct E-filing Base charge + Additional charges + Adv/wit ck + Check charge	1 36.50	36.50
1/13/2025	ML	First legal's service fee for Joint Stipulation to Continue Case Management Conference in Light of Class-Wide Settlement; [Proposed] Order Order #: 17062038	1 7.40	7.40
	ML	First legal's Filing fee for Joint Stipulation to Continue Case Management Conference in Light of Class-Wide Settlement; [Proposed] Order Order #: 17062031	1 38.95	38.95
4/14/2025	IO	LA Superior Court Document Purchase: Amended Complaint. Receipt Number: PA-2025-308922002	1 17.80	17.80
7/14/2025	ML	First Legal's Filing fee for Proof of Service;[Proposed] Order Dismissing Entire Action Electronic Filing Control #: 1-17355233	1 18.90	18.90
	ML	First Legal's Filing fee for Plaintiff's Request for Dismissal of Entire Action Electronic Filing	1 9.25	9.25

7/23/2025

		<u>Qty/Price</u>	<u>Amount</u>
	Control #: 1-17355235		
7/31/2025	ML Copying cost for July, 2025.	1 0.25	0.25
	Total additional charges		\$2,168.88
	Balance due		\$2,168.88

EXHIBIT B

LAFFEY MATRIX

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

			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.