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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SOLANO

DAVID EICHNER AND LESLIE MARIE
QUIST CANTRELLE, individually, and on
behalf of the State of California and other
aggrieved persons,

Plaintiffs,

v.

STAR HOLDING, LLC DBA LOGISTICAL
DATA SERVICES, a Pennsylvania limited
liability company; and DOES 1 through 10,
inclusive,

Defendants.

Case No.: CU23-05731

Assigned for All Purposes to:
Hon. Stephen Gizzi
Dept. 3

**DECLARATION OF JOHN G. YSLAS IN
SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Final Approval Hearing:

Date: July 31, 2026

Time: 9:00 a.m.

Dept.: 3

Action Filed: December 5, 2023

DECLARATION OF JOHN G. YSLAS

I, John G. Yslas, declare as follows:

1. I am an attorney at law licensed to practice before all of the courts of the State of California. I am a Senior Partner at Wilshire Law Firm, PLC (“WLF” or “Class Counsel”), counsel of record for Plaintiffs David Eichner and Leslie Marie Quist Cantrelle (“Plaintiffs”). 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 Plaintiffs’ Motion for Final Approval of Class Action and PAGA Settlement.

3. Plaintiffs are represented by WLF. The attorneys at WLF performed significant work and expended 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 actively and continuously practicing in employment litigation, representing employees in both individual and class actions in both state and federal courts throughout California.

5. WLF is qualified to handle this Litigation because its attorneys are experienced in litigating Labor Code violations in individual, class action, and representative action cases. WLF has handled, and is currently handling, numerous wage and hour class action lawsuits, as well as class actions involving consumer rights and data privacy litigation.

6. I graduated from the University of California, Santa Barbara with High Honors in 1991 with Bachelor of Arts degrees in Psychology. I received my Juris Doctor from UCLA Law School in 1996.

7. Upon graduating from law school in 1996, I worked for a boutique law firm practicing general litigation which included employment law matters. Since 2000 (that is, the last 25 years) my practice has been exclusively focused on labor and employment matters including handling wage and hour class, collective and representative actions (including the California Private Attorneys General Act, or “PAGA”), including in the international law firms of Morgan,

1 Lewis & Bockius LLP (where I was a senior associate), Foley & Lardner LLP (where I was a
2 partner and a national Vice Chair of the Labor and Employment Group), Norton Rose Fulbright
3 LLP (where I was a partner) and Seyfarth Shaw LLP (where I was a partner and member of the
4 Wage and Hour Practice Group). During my time at these law firms, I was the primary attorney
5 or took a major leading role in defending employers on numerous wage and hour class, collective
6 and representative actions.

7 8. In late June 2022 I left Seyfarth Shaw LLP and joined my current firm, Wilshire
8 Law Firm, PLC, to represent plaintiff employees. I have been and am handling many wage and
9 hour class and representative actions litigating such matters on behalf of plaintiff employees in
10 numerous Superior Courts and District Courts. From matters representing both plaintiffs and
11 defendants, I have successfully mediated the resolution of many wage and hour class, collective,
12 and representative actions. Just since starting to settle cases in late April 2023 I have already
13 successfully mediated matters in which I have been counsel or co-counsel resulting in **well over**
14 **\$270 million** in settlements and verdicts which are in the process of being finalized, and with
15 numerous upcoming mediations scheduled. In those and numerous other matters, I have managed
16 and assisted with the litigation and settlement of many wage and hour PAGA and class actions.
17 In those actions, I performed similar tasks as those performed in the course of prosecuting this
18 action. Indeed, I recently tried and prevailed in achieving a jury verdict in a certified wage and
19 hour class action in the matter of *Aguilar-Flores v. Javier's – CC LLC*, Los Angeles County
20 Superior Court, Case No. 19STCV36438 (settled after verdict).

21 9. I have received numerous awards for my legal work. For example, from 2015 to
22 2018, I was listed in Los Angeles Super Lawyers for Employment Litigation (Thomson Reuters).
23 I have also served on numerous prominent boards and in other leadership positions, including
24 serving as Southern California Regional President for the Hispanic National Bar Association and
25 on the board of directors of the Mexican American Bar Foundation. I also previously served on
26 the 5-member Los Angeles Civil Service Commission, which generally oversees the personnel
27 decisions for the City of Los Angeles.

28 10. I have also published numerous blogs on labor and employment issues including

1 on wage and hour issues. For example, I published “Headline News: Wal-Mart v. Dukes-Impact
2 on Class Action Litigation” (while a partner with Foley & Lardner LLP) and “Are You Really
3 Protected From Wage-and-Hour Successor Liability in an Asset Purchase” (while a partner with
4 Seyfarth Shaw LLP). I have also been a presenter at numerous conferences, including being a
5 presenter involving the “Employment Law Update” at a National Employment Law Council
6 conference. I currently bill at an hourly rate of \$1,500.00.

7 11. Jeffrey C. Bills is a Junior Partner at WLF. He graduated from the University of
8 Wisconsin–Madison with a Bachelor of Arts in Journalism and German, and received his Juris
9 Doctor from the University of California, Los Angeles School of Law in 2014. During law school,
10 he was a Senior Editor on the UCLA Law Review and an Articles Editor on the Entertainment
11 Law Review. Mr. Bills served as a Judicial Extern for the Hon. Consuelo Bland Marshall in United
12 States District Court for the Central District of California, and also for the Hon. Sandra R. Klein
13 of United States Bankruptcy Court for the Central District of California. Mr. Bills graduated
14 ranked No. 7 in his graduating class from UCLA School of Law. He was admitted to practice law
15 in the State of California in 2014. Since graduating from law school, he has focused his legal
16 work primarily on employment matters, including wage-and-hour class action and PAGA
17 representative action litigation, and he has helped obtain dozens of settlements on behalf
18 California workers, as well as on behalf of California employers during his years on the defense
19 bar. Mr. Bills is a member of the Beverly Hills Bar Association (BHBA), where he is a past
20 member of the Board of Governors and a past Chair of the Labor & Employment Law Section
21 Executive Committee. He is also a member of the California Employment Lawyers Association
22 (CELA) and the Consumer Attorneys Association of Los Angeles (CAALA). Mr. Bills’ hourly
23 billing rate is \$900.00.

24 12. Lucy H. Nguyen is a Settlement Attorney at WLF. She graduated from San
25 Francisco State University with a Bachelor of Science degree in Business Management and
26 earned her Juris Doctor from John F. Kennedy University, School of Law in 2011. Ms. Nguyen
27 was admitted to practice law in the State of California in 2021. Prior to joining WLF, Ms. Nguyen
28 practiced employment and family law litigation and handled a high-volume statewide docket

1 involving wage-and-hour disputes and complex litigation matters. Since joining WLF, Ms.
2 Nguyen has focused her practice on wage-and-hour class actions and representative actions under
3 the California Private Attorneys General Act (“PAGA”), including drafting and negotiating class
4 and PAGA settlements, approval motions, and related settlement documents. In this and other
5 matters, Ms. Nguyen has performed work including analyzing exposure, drafting settlement
6 agreements and approval papers, coordinating settlement administration issues, and assisting with
7 class and PAGA settlement approval proceedings. Ms. Nguyen currently bills at an hourly rate of
8 \$650.00.

9 13. Mohamed Bholat is a first-year Associate Attorney at Wilshire Law Firm, PLC.
10 He was admitted to practice law in the State of California in 2025. Mr. Bholat graduated from
11 University of California, Riverside with a Bachelor of Arts in Political Science. He received his
12 Juris Doctor from Southwestern Law School. Since graduating, his practice has been mainly
13 focused on wage and hour class action litigation. Mr. Bholat currently bills at an hourly rate of
14 \$500.00.

15 14. Aram Boyadjian was a fifth-year Associate Attorney at WLF. He was admitted to
16 practice law in the State of California in 2021. Mr. Boyadjian graduated from the University of
17 California, Los Angeles, with a Bachelor of Arts in Political Science. He received his Juris Doctor
18 from Loyola Law School. During law school, he was a member of the student editorial board for
19 the International and Comparative Law Review. Since January 2021, his practice has mainly been
20 focused on wage and hour class action litigation. Mr. Boyadjian billed at an hourly rate of
21 \$600.00.

22 15. Andrew Sandoval was a third-year Associate Attorney at WLF. He was admitted
23 to practice law in the State of California in 2022. Mr. Sandoval graduated from Azusa Pacific
24 University with a Bachelor of Arts in Economics. He received his Juris Doctor from Loyola Law
25 School. During law school, he was a Vice-President of La Raza de Loyola. Since graduating, his
26 practice has mainly been focused on wage and hour class action litigation. Mr. Sandoval billed at
27 an hourly rate of \$500.00.

28 16. WLF’s hourly rates are comparable to those charged by other class action

1 plaintiffs' counsel and the firms defending class actions. WLF's rates are well within the range
2 of hourly rates that the Los Angeles legal marketplace would compensate counsel for similar
3 services accomplishing similar results. For example, in *Bronshteyn v. State of California*, Los
4 Angeles County Superior Ct. No. 19SMCV00057, Order Granting Plaintiff's Motion for
5 Statutory Attorneys' Fees and Costs filed March 30, 2023, an employment action brought by two
6 small law firms (Levy, Vinick, Burrell & Hyams LLP and Law Offices of Wendy Musell), the
7 court found that counsel's 2022 hourly rates of \$1,100 and \$1,000 per hour were reasonable for
8 the plaintiff's five senior attorneys, including \$1,000 per hour for the plaintiff's 23-year lead
9 counsel and \$850 per hour for a senior associate. These rates were then augmented by a 1.75
10 lodestar multiplier and affirmed by the California Court of Appeals. The rates (and multiplier)
11 requested here are well in line with those found reasonable in *Bronshteyn*. In *Tran v. Golden State*
12 *FC LLC, et al.* (LASC Case No. BC699931), Fee Order filed 4/8/2022, the court found hourly
13 rates of \$1,300 per hour reasonable for plaintiff's 32-year attorney and \$1,000 per hour reasonable
14 for a 14-year attorney. The requested fee is even more compelling given that Class Counsel
15 represents approximately 194 Class Members and the requested fee results in a negative
16 multiplier.

17 17. WLF has been approved as class counsel by courts in California. *See, e.g., Matthew*
18 *Veliz v. DrinkPak, LLC*, Los Angeles County Superior Court, Case No. 22STCV37384, *Ismael*
19 *Villegas-Sanchez v. COE Orchard Equipment, Inc.*, Sutter County Superior Court, Case No.
20 CVCS22-0002261; *Jessica Bronsal v. PTI Technologies Inc.*, Ventura County Superior Court,
21 Case No. 202200570361CUOE; *Miguel A. Vigil Ruiz v. The De Ruosi Group, LLC*, San Joaquin
22 County Superior Court, Case No. STK-CV-UOE-2022-8780; *Gutierrez v. Top Drawer Merch,*
23 *LLC et al*, Los Angeles County Superior Court, Case No. 23STCV04299; *Wing v. Road*
24 *Machinery, LLC et al*, Kern County Superior Court, Case No. BCV-22-102896; *Hernandez v.*
25 *SGPS Showrig Los Angeles, Inc.*, Los Angeles County Superior Court, Case No. 22STCV28155;
26 *Azevedo v. Tulare Nursing & Rehabilitation Hospital, Inc.*, Tulare County Superior Court, Case
27 No. VCU293325; *Haser v. Universal Chain of California, Inc.*, Sacramento County Superior
28 Court, Case No. 34-2022-00332268; *Caldera v. Performance Online, Inc. et al*, Riverside County

1 Superior Court, Case No. CVRI2306013; *Goosby v. CiminoCare, Inc.*, Sacramento County
2 Superior Court, Case No. 34-2022-00329033; *Rooks v. Hot Cakes Restaurant Group, Inc.*, San
3 Joaquin County Superior Court, Case No. STK-CV-UOE-2022-11056; *Garcia v. Compassionate*
4 *Heart*, Orange County Superior Court, Case No. 30-2022-01294409-CU-OE-CXC; *Parra v.*
5 *Citrus Valley Management Services, Inc.*, Riverside County Superior Court, Case No.
6 CVRI2301768; *Torres v. HomeShield Pest Control Inc.*, Placer County Superior Court, Case No.
7 S-CV-0049525; *Cabrera v. Creekside Auto Group*, Santa Clara County Superior Court, Case No.
8 23CV415661; *Simpson v. Arcos*, Riverside Superior Court, Case No. CVRI2303337; *Payne v.*
9 *Planned Parenthood: Shasta-Diablo, Inc.*, San Francisco County Superior Court, Case No. CGC-
10 23-607359. The total hours expended on this action are reasonable and in line with those
11 expended in comparable cases.

12 18. In cases in which WLF has been approved as class counsel, California courts have
13 approved rates similar to those requested by WLF in the instant case. *See, e.g., Rodolfo Ponce v.*
14 *Youbar, Inc.*, Los Angeles County Superior Court, Case No. 22STCV37519 (WLF's rates were
15 approved as follows: John G. Yslas (\$1,500.00), Samantha A. Smith (\$1,000.00), Jeffrey C. Bils
16 (\$850.00), Aram Boyadjian (\$600.00), Lisa B. Iturriaga (\$550.00), and Andrew Sandoval
17 (\$500.00)); *Sabrina N. Batres v. Wish Automotive II, Inc. dba Infiniti of Van Nuys*, Los Angeles
18 County Superior Court, Case No. 23STCV19968 (WLF's rates were approved as follows: John
19 G. Yslas (\$1,500.00), Jeffrey C. Bils (\$850.00), Aram Boyadjian (\$600.00), Lisa B. Iturriaga
20 (\$550.00), and Andrew Sandoval (\$500.00)); *Diandrea Correa et al. v. CareMeridian, LLC, et.*
21 *al.*, Los Angeles County Superior Court, Case No. 23STCV10707 (WLF's rates were approved
22 as follows: John G. Yslas (\$1,500.00), Samantha A. Smith (\$1,000.00), Jeffrey C. Bils (\$850.00),
23 Fawn F. Bekam (\$800.00), Diego Aviles (\$800.00), Aram Boyadjian (\$600.00), Harry Erganyan
24 (\$600.00), Lisa B. Iturriaga (\$550.00), and Andrew Sandoval (\$500.00)); *Carlos Santos*
25 *Granados v. Sunny Hills Management Co., Inc.*, Los Angeles County Superior Court, Case No.
26 23STCV02109 (WLF's rates were approved as follows: John G. Yslas (\$1,500.00), Samantha A.
27 Smith (\$1,000.00), Jeffrey C. Bils (\$850.00), Diego Aviles (\$750.00), Courtney M. Miller
28 (\$650.00), Aram Boyadjian (\$600.00), Harry Erganyan (\$600.00), Mariam Nazaretyan (\$550.00),

1 Lisa B. Iturriaga (\$550.00), and Andrew Sandoval (\$500.00)); *Kayla Kurges v. Khanna*
2 *Enterprises, Ltd. dba Sheraton Agoura Hills*, Los Angeles County Superior Court, Case No.
3 24STCV01590 (WLF's rates were approved as follows: John G. Yslas (\$1,500.00), Jeffrey C.
4 Bils (\$850.00), Aram Boyadjian (\$600.00), Lisa B. Iturriaga (\$550.00), and Andrew Sandoval
5 (\$500.00)); *Thora Magney et al. v. Levi Strauss & Co., et al.*, Los Angeles County Superior Court,
6 Case No. 24STCV02320 (WLF's rates were approved as follows: John G. Yslas (\$1,500.00),
7 Samantha A. Smith (\$1,000.00), Jeffrey C. Bils (\$850.00), Fawn F. Bekam (\$800.00), Aram
8 Boyadjian (\$600.00), Lisa B. Iturriaga (\$550.00), and Andrew Sandoval (\$500.00)); *Armando*
9 *Muniz, et al. v. Lot LLC, dba Lot Management LLC (fka Red Cow, Inc.) et. al.*, Los Angeles
10 County Superior Court, Case No. 22STCV32901 (WLF's rates were approved as follows: John
11 G. Yslas (\$1,500.00), Samantha A. Smith (\$1,000.00), Jeffrey C. Bils (\$850.00), Diego Aviles
12 (\$750.00), Aram Boyadjian (\$600.00), Harry Erganyan (\$600.00), Mariam Nazaretyan (\$550.00),
13 Lisa B. Iturriaga (\$550.00), and Andrew Sandoval (\$500.00)); *George Munoz v. Century West,*
14 *LLC dba Century West BMW*, Los Angeles County Superior Court, Case No. 23STCV04247
15 (WLF's rates were approved as follows: John G. Yslas (\$1,500.00), Samantha A. Smith
16 (\$1,000.00), Jeffrey C. Bils (\$850.00), Aram Boyadjian (\$600.00), Lisa B. Iturriaga (\$550.00),
17 and Andrew Sandoval (\$500.00)); *Ivan S. Martinez II et. al. v. The Haar Company, et. al.*, Los
18 Angeles County Superior Court, Case No. 23STCV21651 (WLF's rates were approved as follows:
19 John G. Yslas (\$1,500.00), Samantha A. Smith (\$1,000.00), Jeffrey C. Bils (\$850.00), Diego
20 Aviles (\$750.00), Aram Boyadjian (\$600.00), Harry Erganyan (\$600.00), Mariam Nazaretyan
21 (\$550.00), Lisa B. Iturriaga (\$550.00), and Andrew Sandoval (\$500.00)).

22 19. In support of the reasonableness of WLF's hourly rates, attached as **Exhibit 1** is a
23 true and correct excerpt from the *2025 Real Rate Report* published by Wolters Kluwer. The Real
24 Rate Report is widely relied upon in the legal industry because it is derived from anonymized
25 billing data taken from actual law firm invoices that were submitted to clients and approved for
26 payment, rather than from voluntary surveys or self-reported rates. Although the report refers to
27 "2025" rates, the data reflects rates charged by law firms during the first half of 2024 and therefore
28 represents the most recent available objective evidence of prevailing market rates.

1 a. The report provides rate information filtered by geographic market,
2 practice type, and timekeeper role. Page 33 of the report reflects rates drawn from 565 partners
3 and 518 associates practicing in Los Angeles. In that dataset, the third-quartile hourly rate is
4 \$1,365 for partners and \$982 for associates. These figures confirm that Los Angeles is a high-
5 rate legal market and that experienced litigation partners routinely bill in excess of \$1,300 per
6 hour based on rates actually paid by clients in 2024. The Real Rate Report further shows that in
7 the San Diego market, partners with 21 or more years of experience command third-quartile
8 billing rates of approximately \$1,334 per hour, confirming that highly experienced litigators in
9 major California markets routinely bill at the upper end of the rate spectrum.

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

20 c. The Real Rate Report does not provide 1st quartile or 4th quartile rates,
21 presumably to provide a sense of the average attorney billing rates. Importantly, the third quartile
22 represents the point below which 75% of rates fall; it is not a cap on reasonable rates. By
23 definition, a substantial portion of partners in the relevant benchmark market routinely bill above
24 that level, particularly those with extensive experience, specialized expertise, or leadership roles
25 in complex litigation. Courts evaluating fee requests recognize that leading counsel in complex
26 or representative actions may reasonably bill above median or third-quartile benchmarks where
27 their experience, results obtained, and responsibilities justify higher rates. We firmly believe
28 WLF belongs in the 4th quartile of attorney billing rates in Los Angeles. 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. I am a UCLA School of Law graduate with nearly three decades of experience litigating labor and employment matters—including as a partner and holding leadership roles at major international law firms when I was on the defense side for 26 years, as well as substantial recent class and representative action results including being one of the few attorneys in the state of California to try a wage and hour class action to verdict (and prevail), and achieving results exceeding \$225 million in just the last three years since starting to settle matters as a plaintiffs' attorney. My credentials and experience place my \$1,500 hourly rate within the highest tier of Los Angeles employment litigators, consistent with rates that would fall within the fourth quartile beyond those reported in the Real Rate Report.

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

- a. the investigation of the matter, including meeting with Plaintiff, reviewing Defendant's policies, and requesting and reviewing Plaintiff's time and pay records, personnel file, and exploring the corporate structure of Defendant;
- b. filing the Action;
- c. attending status conferences and meeting and conferring with opposing counsel regarding the case;
- d. meeting and conferring with Defendant regarding mediation, exchange of informal discovery beforehand, and negotiating with opposing counsel regarding the parameters thereof;
- e. selecting a mediator and mediation date;
- f. obtaining, reviewing, organizing, and analyzing representative class data, payroll records, time records, policy documents, and other employment records with the assistance of an expert consultant to evaluate liability and damages;

- g. preparing detailed damages analyses, exposure calculations, and a mediation damages model addressing each asserted claim;
- h. preparing the confidential mediation brief and supporting exhibits for mediation;
- i. preparing for, attending, and participating in the full-day mediation conducted before Todd Smith, Esq., including evaluating settlement proposals and negotiating settlement terms throughout the mediation;
- j. continuing settlement negotiations following mediation, including negotiating and revising the Memorandum of Understanding, Settlement Agreement, Class Notice, and related settlement documents;
- k. communicating regularly with Plaintiffs regarding the status of the litigation, mediation, settlement negotiations, and settlement terms;
- l. preparing and filing the Motion for Preliminary Approval and supporting documents;
- m. attending the hearing on Motion for Preliminary Approval;
- n. communicating with any Class Members who sought additional information regarding the settlement, including answering questions regarding the settlement and obtaining updated addresses from Class Members for purposes of receiving the Class Notice and administering the settlement checks; and
- o. reviewing the Settlement Administrator's reports, declaration, settlement calculations, and confirming the absence of objections, exclusions, and workweek disputes;
- p. preparing the Motion for Final Approval, attorneys' fee request, lodestar analysis, supporting declarations, billing summaries, cost documentation, and all other documents necessary to obtain final approval of the Settlement.

21. WLF's current lodestar reflects the efficiencies achieved by attorneys experienced in this field with **134.9** hours of work resulting in **\$123,420.00** in fees. A true and correct copy of Class Counsel's detailed billing records in this matter is attached hereto 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
John G. Yslas	33.3	\$1,500.00	\$49,950.00
Jeffrey C. Bills	41.3	\$900.00	\$37,170.00
Lucy H. Nguyen	15.8	\$650.00	\$10,270.00
Aram Boyadjian (former employee)	37.8	\$600.00	\$22,680.00
Andrew Sandoval (former employee)	6.7	\$500.00	\$3,350.00
TOTAL	134.9		\$123,420.00

22. This amount surpasses the requested fee award of \$91,666.67, resulting in a negative multiplier of approximately 0.74. Class Counsel's lodestar does not include the time Class Counsel will spend at the Final Approval Hearing and assisting the Settlement Administrator following final approval. Class Counsel dedicated significant resources to this case by dividing 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. This time could have been spent on other potentially lucrative cases. Class Counsel's lodestar reflects the efficiencies achieved by attorneys experienced in this field. Moreover, Class Counsel has singularly assumed the risk and costs of litigation purely on a contingency basis. And, while Plaintiffs are confident in the merits of their claims, a legitimate controversy exists as to each cause of action, posing an actual risk that Plaintiffs may not succeed at class certification and/or trial. Any of these obstacles could have prevented recovery completely, meaning Class Counsel would have been left with no compensation for all the time and money invested in litigating this case. Despite these risks, Class Counsel took this case on a contingency basis so that Class Members (a particularly vulnerable group of hourly paid workers) could be compensated for their unpaid wages. Consequently, Class Counsel was precluded from focusing on, or taking on, other cases which could have resulted in a larger, and less risky, monetary gain.

23. In litigation costs, WLF has spent \$24,919.06 on items such as filing fees, service fees, mediation fees, and expert consultant fees. Since Class Counsel's costs do not exceed the maximum of \$30,000.00, the remaining \$5,080.94 will revert to the Net Settlement Amount. A true and correct copy of WLF's cost reports in this matter is attached hereto as **Exhibit 2**. Class Counsel's total costs include those in WLF's cost reports as well as the anticipated \$60.00 filing fee to file this Motion. All the costs incurred were reasonable and necessary for the prosecution of this case.

24. Class Counsel has negotiated a settlement here that they believe is fair, reasonable, and adequate based on their prior experience litigating these types of cases.

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

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

Executed on July 9, 2026 at Los Angeles, California.

John Usher

John G. Yslas

EXHIBIT 1



ELM Solutions

2025 Real Rate Report[®] powered by LegalVIEW[®] DynamicInsights

The industry's leading
analysis of law firm rates,
trends, and practices

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NOTE:

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- Uncheck Enhance thin lines (if it's checked).
- Restart Acrobat and reopen the PDF.

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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Step into the future of legal spend management with responsibly developed AI-powered solutions.



Our innovative Total Spend Management approach leverages AI-powered capabilities to empower intelligent workflows and improved outcomes.



Up to 10% savings on legal spend



Up to 20% improvement in billing guideline compliance



Increased efficiencies free up time for more value-add work

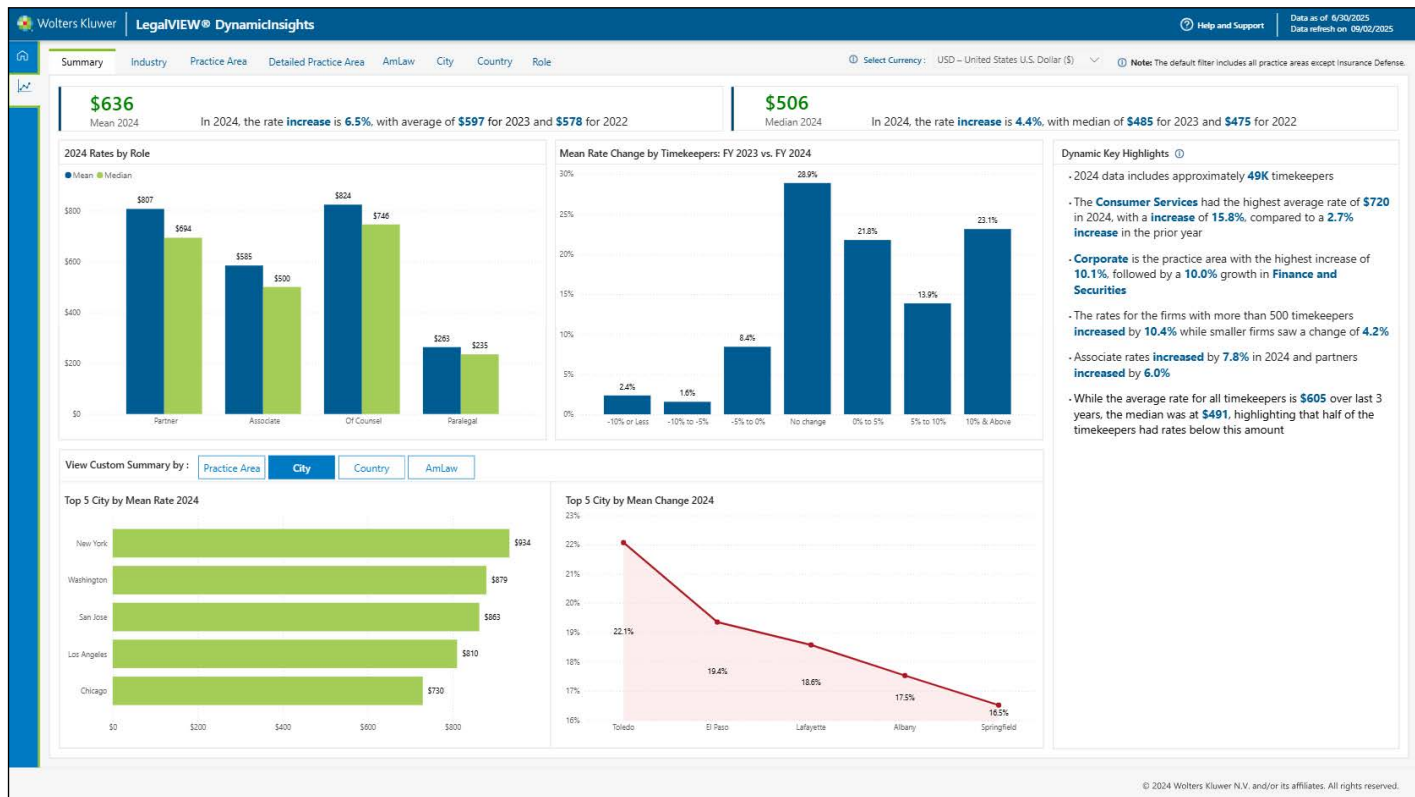
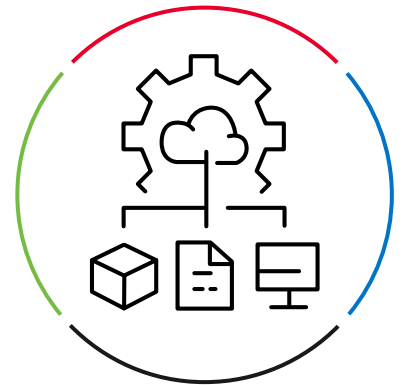


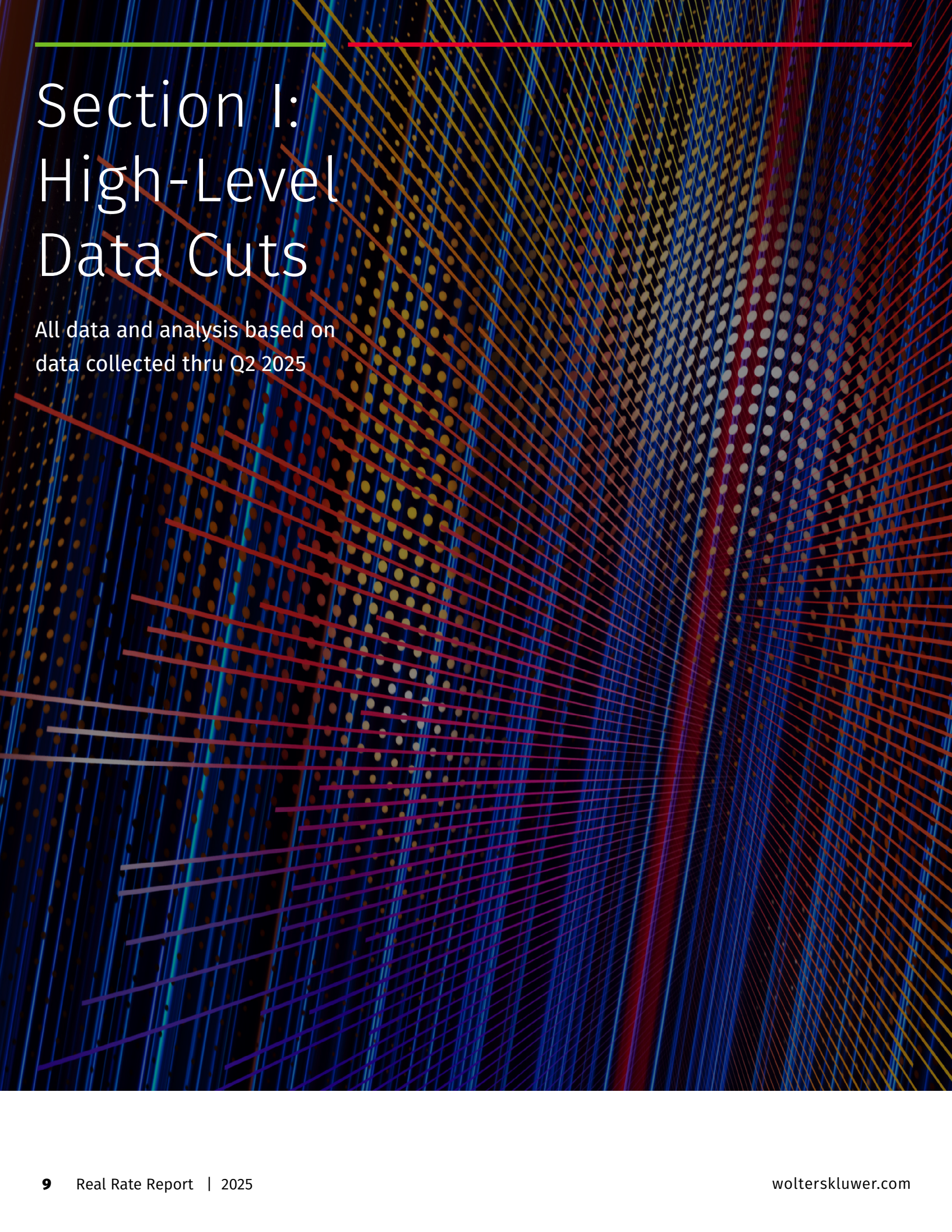
LegalVIEW® DynamicInsights

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.

Data that wins awards...and rate negotiations

- **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.





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

EXHIBIT 2**SUMMARY OF LITIGATION COSTS INCURRED**

Description	Amount
Court Filing and Electronic Filing Fees	\$4,297.03
Anticipated Filing Fee for Motion	\$60.00
Process Service Fees	\$480.00
California Labor and Workforce Development Agency Filing Fee	\$75.00
Mediation Fees (Todd Smith, Esq.)	\$10,000.00
Expert Consultant Fees (Berger Consulting Group)	\$9,815.00
Litigation Support (Creal Consulting, Inc.)	\$174.25
Printing Costs	\$14.00
Electronic Signature (DocuSign)	\$3.78
Total Litigation Costs Requested	\$24,919.06