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and on behalf of others similarly situated

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF KINGS**

SEAN MARTINEZ, individually, and on behalf
of all others similarly situated,

Plaintiff,

vs.

MILLENNIUM FIRE PROTECTION
CORPORATION, a California corporation;
MILLENNIUM FIRE PROTECTION
SERVICES, INC., a California corporation; and
DOES 1 through 10, inclusive,

Defendants.

Case No.: 23CU0271

*Assigned for all purposes to:
Hon. Robert S. Burns, Dept. 2*

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

Final Approval Motion Hearing

Date: May 6, 2026

Time: 8:15 a.m.

Dept.: 2

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 “Plaintiff’s Counsel”), counsel of record for Plaintiff Sean Martinez (“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 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 or
5 took a major leading role in defending employers on numerous wage and hour class, collective and
6 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 **\$235 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. In
17 those actions, I performed similar tasks as those performed in the course of prosecuting this action.
18 Indeed, I recently tried and prevailed in achieving a jury verdict in a certified wage and hour class
19 action in the matter of *Aguilar-Flores v. Javier's – CC LLC*, Los Angeles County Superior Court,
20 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 the
26 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 on

1 wage and hour issues. For example, I published “Headline News: Wal-Mart v. Dukes-Impact on
2 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. Bils 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 Law
11 Review. Mr. Bils served as a Judicial Extern for the Hon. Consuelo Bland Marshall in United States
12 District Court for the Central District of California, and also for the Hon. Sandra R. Klein of United
13 States Bankruptcy Court for the Central District of California. He graduated ranked No. 7 in his
14 graduating class from UCLA School of Law. He was admitted to practice law in the State of
15 California in 2014. Since graduating from law school, he has focused his legal work primarily on
16 employment matters, including wage-and-hour class action and PAGA representative action
17 litigation, and he has helped obtain dozens of settlements on behalf California workers, as well as
18 on behalf of California employers during his years on the defense bar. He is a member of the
19 Beverly Hills Bar Association (BHBA), where he serves as a current member of the Board of
20 Governors and is a past Chair of the Labor & Employment Law Section Executive Committee. He
21 is also a member of the California Employment Lawyers Association (CELA). Mr. Bils currently
22 bills at an hourly rate of \$850.00.

23 12. Emily Borman is a Junior Partner at Wilshire Law Firm, PLC. She was admitted to
24 practice law in the State of California in May 2015. Ms. Borman graduated from Cornell University
25 with a Bachelor of Science in Development Sociology and a Minor in Applied Economics and
26 Management. While at Cornell she was inducted into the Alpha Kappa Delta International Honor
27 Society. Ms. Borman received her Juris Doctor from University of California Law San Francisco
28 (formerly UC Hastings). Since graduating, her practice has been in employment law, including

1 Plaintiff-side wage and hour cases. Ms. Borman has received numerous awards for her legal work.
2 In 2021 and from 2023 to 2025, Super Lawyers selected her as a “Southern California Rising Star.”
3 Ms. Borman was selected as one of the “Best Lawyers in America” from 2021 to 2026. Ms.
4 Borman currently bills at an hourly rate of \$850.00.

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

11 14. WLF’s hourly rates are comparable to those charged by other class action plaintiffs’
12 counsel and the firms defending class actions. WLF’s rates are well within the range of hourly
13 rates that the Los Angeles legal marketplace would compensate counsel for similar services
14 accomplishing similar results. For example, in *Bronshteyn v. State of California*, Los Angeles
15 County Superior Ct. No. 19SMCV00057, Order Granting Plaintiff’s Motion for Statutory
16 Attorneys’ Fees and Costs filed March 30, 2023, an employment action brought by two small law
17 firms (Levy, Vinick, Burrell & Hyams LLP and Law Offices of Wendy Musell), the court found
18 that counsel’s 2022 hourly rates of \$1,100 and \$1,000 per hour were reasonable for the plaintiff’s
19 five senior attorneys, including \$1,000 per hour for the plaintiff’s 23-year lead counsel and \$850
20 per hour for a senior associate. These rates were then augmented by a 1.75 lodestar multiplier and
21 affirmed by the California Court of Appeals. The rates (and multiplier) requested here are well in
22 line with those found reasonable in *Bronshteyn*. In *Tran v. Golden State FC LLC, et al.* (LASC
23 Case No. BC699931), Fee Order filed 4/8/2022, the court found hourly rates of \$1,300 per hour
24 reasonable for plaintiff’s 32-year attorney and \$1,000 per hour reasonable for a 14-year attorney.
25 The multiplier here is even more compelling given Class counsel represents approximately 106
26 Class Members.

27 15. WLF has been approved as Class Counsel by courts in California. *See, e.g., Matthew*
28 *Veliz v. DrinkPak, LLC*, Los Angeles County Superior Court, Case No. 22STCV37384, *Ismael*

1 *Villegas-Sanchez v. COE Orchard Equipment, Inc.*, Sutter County Superior Court, Case No.
2 CVCS22-0002261; *Jessica Bronsal v. PTI Technologies Inc.*, Ventura County Superior Court,
3 Case No. 202200570361CUOE; *Miguel A. Vigil Ruiz v. The De Ruosi Group, LLC*, San Joaquin
4 County Superior Court, Case No. STK-CV-UOE-2022-8780; *Gutierrez v. Top Drawer Merch, LLC*
5 *et al*, Los Angeles County Superior Court, Case No. 23STCV04299; *Wing v. Road Machinery,*
6 *LLC et al*, Kern County Superior Court, Case No. BCV-22-102896; *Hernandez v. SGPS Showrig*
7 *Los Angeles, Inc.*, Los Angeles County Superior Court, Case No. 22STCV28155; *Azevedo v.*
8 *Tulare Nursing & Rehabilitation Hospital, Inc.*, Tulare County Superior Court, Case No.
9 VCU293325; *Haser v. Universal Chain of California, Inc.*, Sacramento County Superior Court,
10 Case No. 34-2022-00332268; *Caldera v. Performance Online, Inc. et al*, Riverside County
11 Superior Court, Case No. CVRI2306013; *Goosby v. CiminoCare, Inc.*, Sacramento County
12 Superior Court, Case No. 34-2022-00329033; *Rooks v. Hot Cakes Restaurant Group, Inc.*, San
13 Joaquin County Superior Court, Case No. STK-CV-UOE-2022-11056; *Garcia v. Compassionate*
14 *Heart*, Orange County Superior Court, Case No. 30-2022-01294409-CU-OE-CXC; *Parra v. Citrus*
15 *Valley Management Services, Inc.*, Riverside County Superior Court, Case No. CVRI2301768;
16 *Torres v. HomeShield Pest Control Inc.*, Placer County Superior Court, Case No. S-CV-0049525;
17 *Cabrera v. Creekside Auto Group*, Santa Clara County Superior Court, Case No. 23CV415661;
18 *Simpson v. Arcos*, Riverside Superior Court, Case No. CVRI2303337; *Payne v. Planned*
19 *Parenthood: Shasta-Diablo, Inc.*, San Francisco County Superior Court, Case No. CGC-23-
20 607359. The total hours expended on this action are reasonable and in line with those expended in
21 comparable cases.

22 16. In cases in which WLF has been approved as Class Counsel, California courts have
23 approved rates similar to those requested by WLF in the instant case. *See, e.g., Rodolfo Ponce v.*
24 *Youbar, Inc.*, Los Angeles County Superior Court, Case No. 22STCV37519 (WLF's rates were
25 approved as follows: John G. Yslas (\$1,500.00), Samantha A. Smith (\$1,000.00), Jeffrey C. Bils
26 (\$850.00), Aram Boyadjian (\$600.00), Lisa B. Iturriaga (\$550.00), and Andrew Sandoval
27 (\$500.00)); *Sabrina N. Batres v. Wish Automotive II, Inc. dba Infiniti of Van Nuys*, Los Angeles
28 County Superior Court, Case No. 23STCV19968 (WLF's rates were approved as follows: John G.

Yslas (\$1,500.00), Jeffrey C. Bills (\$850.00), Aram Boyadjian (\$600.00), Lisa B. Iturriaga (\$550.00), and Andrew Sandoval (\$500.00)); *Diandrea Correa et al. v. CareMeridian, LLC, et al.*, Los Angeles County Superior Court, Case No. 23STCV10707 (WLF's rates were approved as follows: John G. Yslas (\$1,500.00), Samantha A. Smith (\$1,000.00), Jeffrey C. Bills (\$850.00), Fawn F. Bekam (\$800.00), Diego Aviles (\$800.00), Aram Boyadjian (\$600.00), Harry Erganyan (\$600.00), Lisa B. Iturriaga (\$550.00), and Andrew Sandoval (\$500.00)); *Carlos Santos Granados v. Sunny Hills Management Co., Inc.*, Los Angeles County Superior Court, Case No. 23STCV02109 (WLF's rates were approved as follows: John G. Yslas (\$1,500.00), Samantha A. Smith (\$1,000.00), Jeffrey C. Bills (\$850.00), Diego Aviles (\$750.00), Courtney M. Miller (\$650.00), Aram Boyadjian (\$600.00), Harry Erganyan (\$600.00), Mariam Nazaretyan (\$550.00), Lisa B. Iturriaga (\$550.00), and Andrew Sandoval (\$500.00)); *Kayla Kurges v. Khanna Enterprises, Ltd. dba Sheraton Agoura Hills*, Los Angeles County Superior Court, Case No. 24STCV01590 (WLF's rates were approved as follows: John G. Yslas (\$1,500.00), Jeffrey C. Bills (\$850.00), Aram Boyadjian (\$600.00), Lisa B. Iturriaga (\$550.00), and Andrew Sandoval (\$500.00)); *Thora Magney et al. v. Levi Strauss & Co., et al.*, Los Angeles County Superior Court, Case No. 24STCV02320 (WLF's rates were approved as follows: John G. Yslas (\$1,500.00), Samantha A. Smith (\$1,000.00), Jeffrey C. Bills (\$850.00), Fawn F. Bekam (\$800.00), Aram Boyadjian (\$600.00), Lisa B. Iturriaga (\$550.00), and Andrew Sandoval (\$500.00)); *Armando Muniz, et al. v. Lot LLC, dba Lot Management LLC (fka Red Cow, Inc.) et al.*, Los Angeles County Superior Court, Case No. 22STCV32901 (WLF's rates were approved as follows: John G. Yslas (\$1,500.00), Samantha A. Smith (\$1,000.00), Jeffrey C. Bills (\$850.00), Diego Aviles (\$750.00), Aram Boyadjian (\$600.00), Harry Erganyan (\$600.00), Mariam Nazaretyan (\$550.00), Lisa B. Iturriaga (\$550.00), and Andrew Sandoval (\$500.00)); *George Munoz v. Century West, LLC dba Century West BMW*, Los Angeles County Superior Court, Case No. 23STCV04247 (WLF's rates were approved as follows: John G. Yslas (\$1,500.00), Samantha A. Smith (\$1,000.00), Jeffrey C. Bills (\$850.00), Aram Boyadjian (\$600.00), Lisa B. Iturriaga (\$550.00), and Andrew Sandoval (\$500.00)); *Ivan S. Martinez II et al. v. The Haar Company, et al.*, Los Angeles County Superior Court, Case No. 23STCV21651 (WLF's rates were approved as follows: John G. Yslas (\$1,500.00),

1 Samantha A. Smith (\$1,000.00), Jeffrey C. Bills (\$850.00), Diego Aviles (\$750.00), Aram
2 Boyadjian (\$600.00), Harry Erganyan (\$600.00), Mariam Nazaretyan (\$550.00), Lisa B. Iturriaga
3 (\$550.00), and Andrew Sandoval (\$500.00)).

4 17. In support of the reasonableness of WLF's hourly rates, attached as **Exhibit 1** is a
5 true and correct excerpt from the *2025 Real Rate Report* published by Wolters Kluwer. The Real
6 Rate Report is widely relied upon in the legal industry because it is derived from anonymized
7 billing data taken from actual law firm invoices that were submitted to clients and approved for
8 payment, rather than from voluntary surveys or self-reported rates. Although the report refers to
9 "2025" rates, the data reflects rates charged by law firms during the first half of 2024 and therefore
10 represents the most recent available objective evidence of prevailing market rates.

11 a. The report provides rate information filtered by geographic market, practice type,
12 and timekeeper role. Page 26 reports third-quartile rates for attorneys handling litigation matters
13 in San Francisco and San Jose, which are the primary Northern California legal markets and serve
14 as the dominant rate-setting centers for complex litigation throughout the region. In San Francisco,
15 the dataset shows third-quartile hourly rates of \$1,378 for litigation partners and \$875 for
16 associates. In San Jose, the report shows third-quartile hourly rates of \$1,250 for litigation partners
17 and \$1,030 for associates. The report's in-depth city analyses for San Francisco and San Jose
18 further confirm that these markets consistently reflect some of the highest billing rates in the
19 country for experienced litigators and serve as the benchmark markets for Northern California legal
20 services. Courts evaluating fee requests in Kings County routinely look to the prevailing rates in
21 the nearest major metropolitan markets as benchmarks when assessing reasonableness. The closest
22 and most relevant comparison markets for Kings County litigation are San Francisco and San Jose,
23 where experienced partners routinely bill well above \$1,200 per hour based on rates actually
24 charged to clients.

25 b. The 2025 Real Rate Report's practice-area-specific data further supports this
26 conclusion. Page 81 provides third-quartile rates for the detailed practice category "Employment
27 and Labor: Other Litigation," which is directly analogous to the type of work performed in this
28 case. That dataset includes 24 partners and 14 associates and shows a third-quartile rate of \$1,252

1 per hour for partners and \$564 per hour for associates. These figures demonstrate that even within
2 the specialized employment litigation market, partners regularly bill well above \$1,200 per hour
3 based on rates actually charged to clients. When this practice-specific benchmark is considered
4 together with the broader regional market data, it confirms that WLF's hourly rate for highly
5 experienced counsel in a representative employment action falls within the upper range of
6 prevailing market rates rather than outside it.

7 c. The Real Rate Report does not provide 1st quartile or 4th quartile rates, presumably
8 to provide a sense of the average attorney billing rates. Importantly, the third quartile represents
9 the point below which 75% of rates fall; it is not a cap on reasonable rates. By definition, a
10 substantial portion of partners in the relevant benchmark market routinely bill above that level,
11 particularly those with extensive experience, specialized expertise, or leadership roles in complex
12 litigation. Courts evaluating fee requests recognize that leading counsel in complex or
13 representative actions may reasonably bill above median or third-quartile benchmarks where their
14 experience, results obtained, and responsibilities justify higher rates. We firmly believe WLF
15 belongs in the 4th quartile of attorney billing rates in Northern California. As previously discussed,
16 WLF is a nationally recognized employment litigation firm that has been named one of the nation's
17 *Best Law Firms* by U.S. News & World Report and Best Lawyers since 2020, and its attorneys
18 regularly litigate complex wage-and-hour class and representative actions throughout California. I
19 am a UCLA School of Law graduate with nearly three decades of experience litigating labor and
20 employment matters—including as a partner and holding leadership roles at major international
21 law firms when I was on the defense side for 26 years, as well as substantial recent class and
22 representative action results including being one of the few attorneys in the state of California to
23 try a wage and hour class action to verdict (and prevail), and achieving results exceeding \$225
24 million in just the last three years since starting to settle matters as a plaintiffs' attorney. My
25 credentials and experience place my \$1,500 hourly rate within the highest tier of Northern
26 California employment litigators, consistent with rates that would fall within the fourth quartile
27 beyond those reported in the Real Rate Report.

28 18. WLF has performed significant work and incurred litigation costs in prosecuting

1 this matter with no guarantee of any payment. The efforts expended by Plaintiff's counsel to
2 achieve this result include, but are not limited to, the following:

3 a. the investigation of the matter, including meeting with Plaintiff, reviewing
4 Defendants' policies, and requesting and reviewing Plaintiff's time and pay records, personnel
5 files, and exploring the corporate structure of Defendants;

6 b. filing the Actions;

7 c. attending status conferences and meeting and conferring with Defendants regarding
8 the case;

9 d. meeting and conferring with Defendants regarding mediation, exchange of informal
10 discovery beforehand, and negotiating with opposing counsel regarding the parameters thereof;

11 e. selecting a mediator and mediation date;

12 f. working with opposing counsel and expert consultants for the receipt of a
13 representative sampling and analyzing the same with the aid of expert consultants and Plaintiff to
14 perform analyses of liability and exposure prior to attendance of the mediation in this matter;

15 g. reviewing policy documents from Defendants and researching applicable defenses;

16 h. preparation of the mediation brief and damages model for use at mediation;

17 i. attendance at the mediations by all Parties and Counsel;

18 j. communicating with Plaintiff who requested updates or other information regarding
19 this matter;

20 k. negotiating, finalizing and fully executing the settlement agreement;

21 l. preparing and filing the Motion for Preliminary Approval and supporting
22 documents;

23 o. attending the hearings on Motion for Preliminary Approval;

24 q. communicating with class members who sought additional information regarding
25 the settlement, including answering questions regarding the settlement and obtaining updated
26 addresses from class members for purposes of receiving the class notices and administering the
27 settlement checks; and

28 r. preparing the instant Motion for Final Approval and supporting documents.

19. WLF's current lodestar reflects the efficiencies achieved by attorneys experienced in this field with **140.2** hours of work resulting in **\$140,010.00** in fees. 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	49.6	\$1,500.00	\$74,400.00
Jeffrey C. Bils	37.8	\$850.00	\$32,130.00
Emily Borman	7.2	\$850.00	\$6,120.00
Aram Boyadjian	45.6	\$600.00	\$27,360.00
TOTAL	140.2		\$140,010.00

20. The risk factors present in this case favor the application of a 1.10 multiplier. 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. Plaintiff's Counsel's lodestar reflects the efficiencies achieved by attorneys experienced in this field. Moreover, Plaintiff's Counsel has singularly assumed the risk and costs of litigation purely on a contingency basis. And, while Plaintiff are 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 succeed at class certification and/or trial. Any of these obstacles could have prevented recovery completely, meaning Plaintiff's Counsel would have been left with no compensation for all the time and money invested in litigating this case. Despite these risks, Plaintiff's 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, Plaintiff's Counsel was precluded from focusing on, or taking on, other cases which could have resulted in a larger, and less risky, monetary gain.

21. In litigation costs, WLF has spent \$16,560.65 on items such as filing fees, service fees, mediation fees, and expert fees. A true and correct copy of WLF's cost reports in this matter are attached hereto as **Exhibit 2**. All of the costs incurred were reasonable and necessary for the prosecution of this case.

22. Plaintiff's Counsel has negotiated a settlement here that they believe is fair, reasonable, and adequate based on their prior experience litigating these type of cases.

23. 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 April 10, 2026 at Los Angeles, California.


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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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

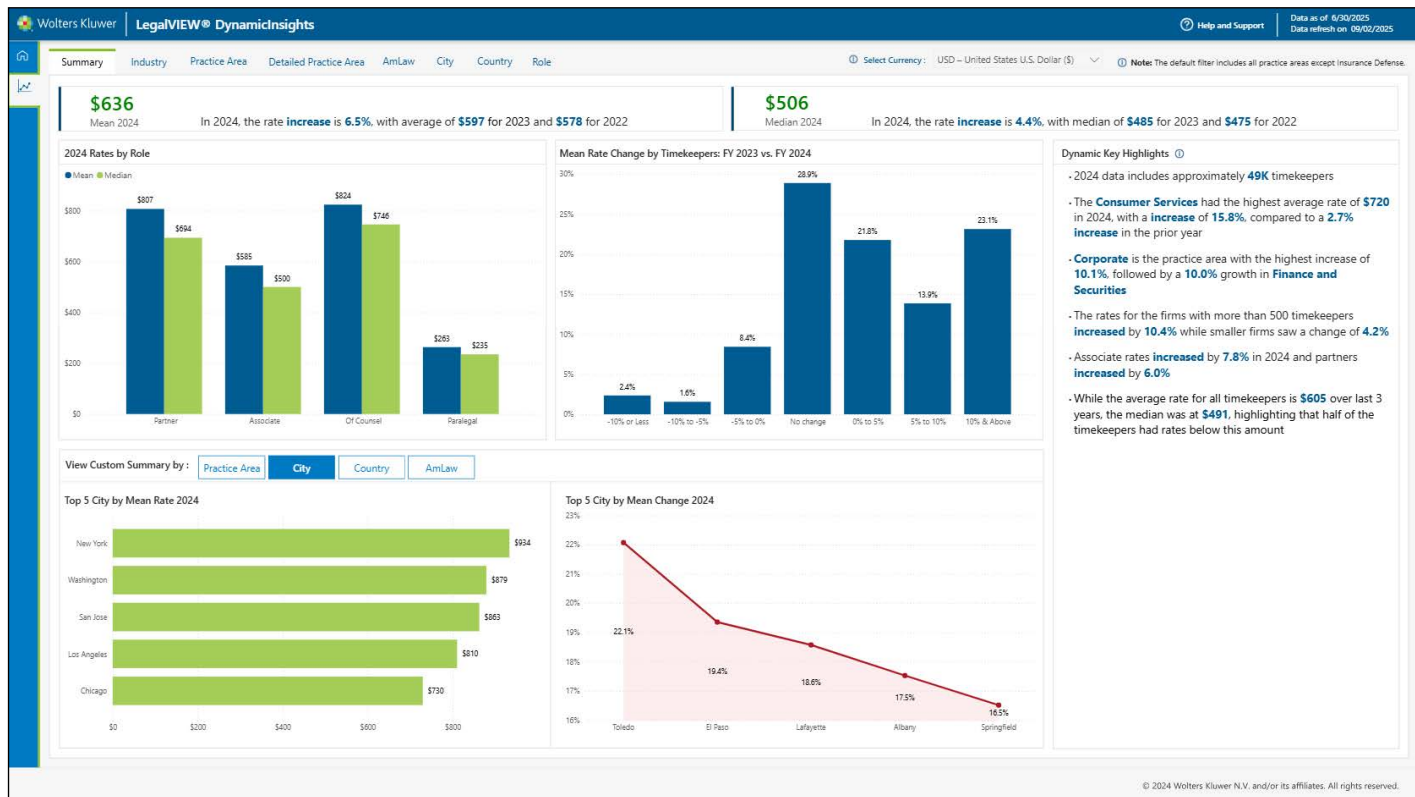
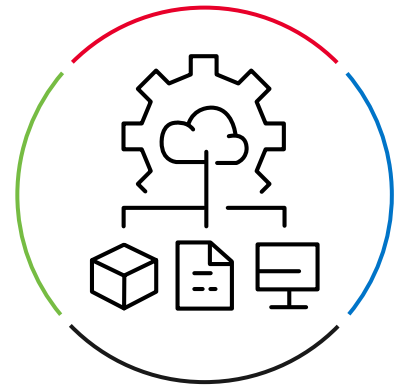


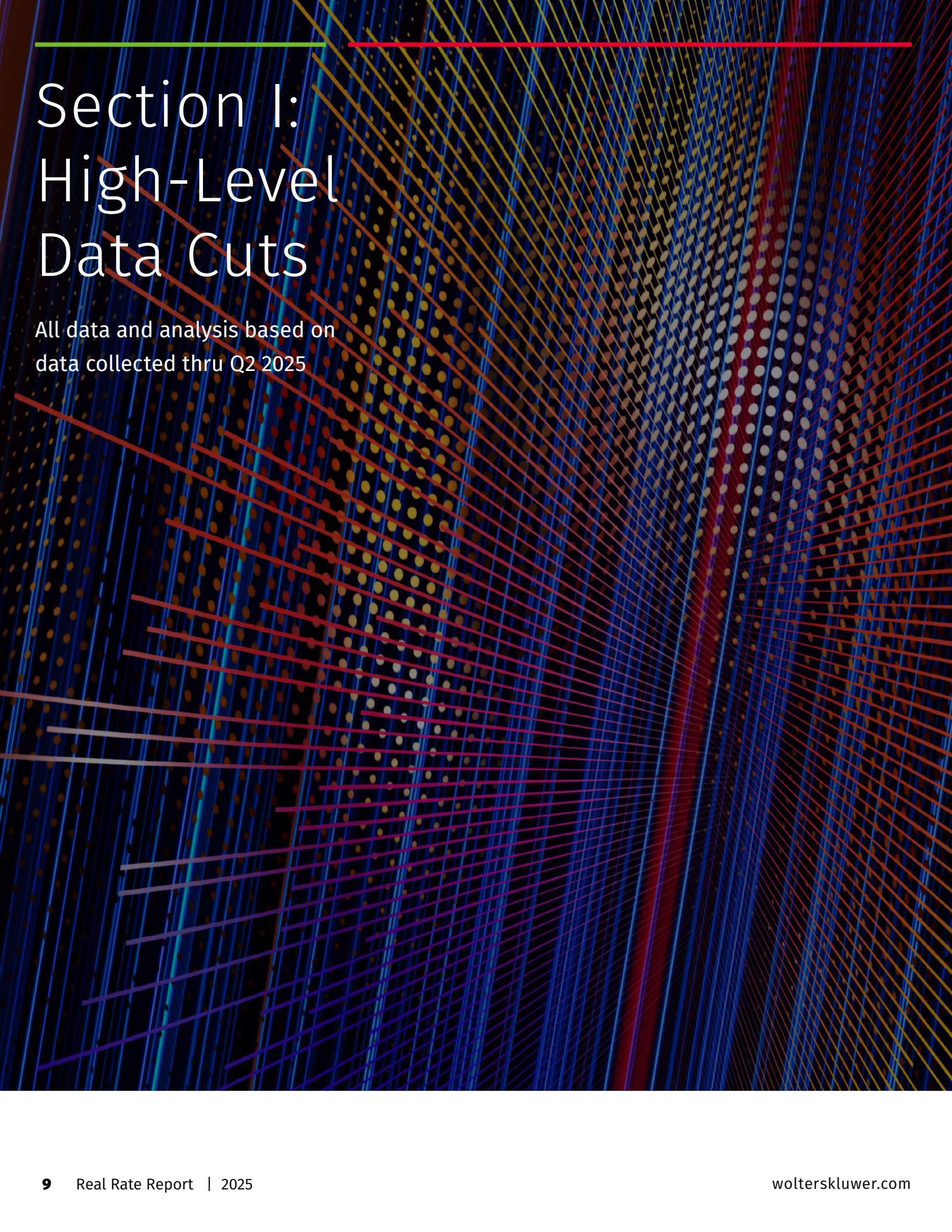
LegalVIEW® DynamicInsights

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 Matter Type

2025 Real Rates for Associate and Partner

Trend Analysis - Mean

City	Matter Type	Role	n	First Quartile	Median	Third Quartile	2025	2024	2023
San Francisco CA	Litigation	Partner	106	\$400	\$718	\$1,378	\$908	\$819	\$803
		Associate	80	\$385	\$666	\$875	\$683	\$652	\$614
	Non-Litigation	Partner	132	\$445	\$689	\$1,249	\$856	\$868	\$788
		Associate	97	\$335	\$550	\$922	\$640	\$664	\$593
San Jose CA	Litigation	Partner	23	\$650	\$800	\$1,250	\$998	\$1,024	\$1,011
		Associate	20	\$625	\$815	\$1,030	\$852	\$802	\$721
	Non-Litigation	Partner	33	\$745	\$950	\$1,266	\$1,033	\$1,104	\$1,108
		Associate	27	\$527	\$610	\$966	\$718	\$709	\$701
Seattle WA	Litigation	Partner	57	\$520	\$902	\$925	\$790	\$719	\$628
		Associate	29	\$425	\$653	\$700	\$586	\$518	\$475
	Non-Litigation	Partner	119	\$402	\$615	\$925	\$694	\$635	\$652
		Associate	79	\$307	\$445	\$676	\$496	\$484	\$467



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

Expenses Subtotals - Filtered Exp. Type

As of 2026-04-07 15:49:21 Pacific Standard Time/PST • Generated by Saul Solares

Filtered By

Show: All matters

Matter: ID equals a0L5G00000X0M7t

Expense Type equals E127 — DTF,DTF,E108 — Postage,E102 — Printing

Display Name ↑	Expense Type ↑	Date	Expense: Expense ID	Provider Name	Note	Amount	Reduction Amount	Amount Paid	Amount Due.
Sean Martinez - Wage & Hour: 3/16/2023	DTF	7/27/2023	E-3151230		Docusign Envelope	\$1.89			\$1.89
	Subtotal	Sum				\$1.89	\$0.00	\$0.00	\$1.89
		Count	1						
	E108 — Postage	10/17/2023	E-3151814			\$0.63			\$0.63
		7/18/2023	E-3132560			\$7.42			\$7.42
		7/18/2023	E-3132559			\$7.42			\$7.42
		7/18/2023	E-3132556			\$7.42			\$7.42
		7/18/2023	E-3132557			\$7.42			\$7.42
		5/26/2023	E-3098154			\$8.23			\$8.23
		5/26/2023	E-3098153			\$8.23			\$8.23
		5/22/2023	E-3094368			\$6.85			\$6.85
		5/22/2023	E-3094367			\$6.85			\$6.85
		5/22/2023	E-3094366			\$6.85			\$6.85
	Subtotal	Sum				\$67.32	\$0.00	\$0.00	\$67.32
		Count	10						
	Subtotal	Sum				\$69.21	\$0.00	\$0.00	\$69.21
		Count	11						
Total		Sum				\$69.21	\$0.00	\$0.00	\$69.21
		Count	11						

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WILSHIRE
LAW FIRM

Client Cost Report

Account	Type	Date	Num	Name	Matter Display Name	Line Memo	Amount
501500 Cost of Sale : Court Filing Fees	C r e d i t Card	10/15/2025	CC103125TA-1463	One Legal LLC	Millennium Fire Protection (Martinez) - Wage & Hour (Class Action)	26508864-241265-Atty Svc for Court Filing-Change of Address,Stip & Ord-Sean Martinez-3/16/2023	\$44.86
502500 Cost of Sale : Legal Expenses	Journal	2/15/2026	JE021526JC-01		Millennium Fire Protection (Martinez) - Wage & Hour (Class Action)	11976207-Sean Martinez-03/16/23-CourtCall	\$72.00
502500 Cost of Sale : Legal Expenses	Journal	2/15/2026	JE021526JC-01		Millennium Fire Protection (Martinez) - Wage & Hour (Class Action)	11976208-Sean Martinez-03/16/23-CourtCall	\$72.00
Total							\$188.86

Wilshire Law Firm, PLC
Client Costs Detailed Report
All Transactions

04/07/26

Accrual Basis

Type	Date	Num	Class	Source Name	Memo	Amount	Balance
500000 · COS							
501500 · Court Filing Fees							
Bill	09/08/2023	64013	MillenniumFirePro(Martinez).W&H	Valpro Attorney Services, LLC	64013-MillenniumFirePro(Martinez).W&H-File x2 Proofs	45.00	45.00
Bill	12/05/2023	68383	MillenniumFirePro(Martinez).W&H	Valpro Attorney Services, LLC	68383 MillenniumFirePro(Martinez).W&H-File x2 proofs	45.00	90.00
Credit C...	07/03/2023	20719797	MillenniumFirePro(Martinez).W&H	One Legal LLC	20719797-S&C-Atty Svc for Court Filing-241265 MillenniumFirePro(...	1,492.67	1,582.67
Credit C...	10/17/2023	21432687	MillenniumFirePro(Martinez).W&H	One Legal LLC	21432687-241265-Sean Martinez vs. Millennium Fire Protection Cor...	18.43	1,601.10
Credit C...	10/19/2023	21432688	MillenniumFirePro(Martinez).W&H	One Legal LLC	21432688-241265-Sean Martinez vs. Millennium Fire Protection Cor...	77.21	1,678.31
Credit C...	10/26/2023	21506148	MillenniumFirePro(Martinez).W&H	One Legal LLC	21506148-241265-Sean Martinez vs. Millennium Fire Protection Cor...	169.76	1,848.07
Credit C...	11/15/2023	21613938	MillenniumFirePro(Martinez).W&H	One Legal LLC	21613938-Comp.Summons,CCCS-Atty Svc for Court Filing-241265 ...	13.33	1,861.40
Credit C...	11/17/2023	21643852	MillenniumFirePro(Martinez).W&H	One Legal LLC	21643852-Comp.Summons,CCCS-Atty Svc for Court Filing-241265 ...	1,492.67	3,354.07
Credit C...	02/29/2024	22338127	MillenniumFirePro(Martinez).W&H	One Legal LLC	22338127-CMCS-Atty Svc for Court Filing-241265 Sean Martinez vs...	17.40	3,371.47
Credit C...	03/18/2024	22451756	MillenniumFirePro(Martinez).W&H	One Legal LLC	22451756-CMCS-Atty Svc for Court Filing-241265 Sean Martinez vs...	17.40	3,388.87
Credit C...	08/05/2024	23414985	MillenniumFirePro(Martinez).W&H	One Legal LLC	23414985-241265-Atty Svc for Court Filing-CMCS-MillenniumFirePr...	23.58	3,412.45
Credit C...	08/05/2024	23415133	MillenniumFirePro(Martinez).W&H	One Legal LLC	23415133-241265-Atty Svc for Court Filing-CMCS-MillenniumFirePr...	23.58	3,436.03
Credit C...	11/27/2024	24224288	MillenniumFirePro(Martinez).W&H	One Legal LLC	24224288-241265-Atty Svc for Court Filing-CMCS-MillenniumFirePr...	21.11	3,457.14
Credit C...	11/27/2024	24224407	MillenniumFirePro(Martinez).W&H	One Legal LLC	24224407-241265-Atty Svc for Court Filing-CMCS-MillenniumFirePr...	21.11	3,478.25
Credit C...	03/10/2025	24825955	MillenniumFirePro(Martinez).W&H	One Legal LLC	24825955-241265-Atty Svc for Court Filing-Declar,Ord-MillenniumFi...	19.57	3,497.82
Credit C...	06/17/2025	25624716	MillenniumFirePro(Martinez).W&H	One Legal LLC	25624716-241265-Atty Svc for Court Filing-Declar,Ord,POS-Millenni...	23.18	3,521.00
Total 501500 · Court Filing Fees						3,521.00	3,521.00
502500 · Legal Expenses							
Credit C...	07/24/2023		MillenniumFirePro(Martinez).W&H	Department of Industrial Relations	ORD-000242117 (241265) MillenniumFire.	75.00	75.00
General...	10/30/2023	10.30.23	MillenniumFirePro(Martinez).W&H	241265 MillenniumFirePro(Marti...	11759550-MillenniumFirePro(Martinez).W&H-CourtCall	72.00	147.00
General...	03/11/2024	03.11.24	MillenniumFirePro(Martinez).W&H	219556 Scanlon,Lesa M~03/05/21	11805399-MillenniumFirePro(Martinez).W&H-CourtCall	72.00	219.00
General...	03/26/2024	03.26.24	MillenniumFirePro(Martinez).W&H	241265 MillenniumFirePro(Marti...	11810815-MillenniumFirePro(Martinez).W&H-CourtCall	72.00	291.00
General...	08/08/2024	08.08.24	MillenniumFirePro(Martinez).W&H	219961 Simpson,Edward V~11/...	11850582-MillenniumFirePro(Martinez).W&H-CourtCall	72.00	363.00
General...	08/08/2024	08.08.24	MillenniumFirePro(Martinez).W&H	219961 Simpson,Edward V~11/...	11850585-MillenniumFirePro(Martinez).W&H-CourtCall	72.00	435.00
General...	12/04/2024	12.04.24	MillenniumFirePro(Martinez).W&H	247896 BobsTowing(Crawford)....	11882675-MillenniumFirePro(Martinez).W&H-CourtCall	72.00	507.00
General...	12/04/2024	12.04.24	MillenniumFirePro(Martinez).W&H	247896 BobsTowing(Crawford)....	11882680-MillenniumFirePro(Martinez).W&H-CourtCall	72.00	579.00
General...	12/04/2024	12.04.24	MillenniumFirePro(Martinez).W&H	247896 BobsTowing(Crawford)....	11882681-MillenniumFirePro(Martinez).W&H-CourtCall	72.00	651.00
General...	12/04/2024	12.04.24	MillenniumFirePro(Martinez).W&H	247896 BobsTowing(Crawford)....	11882682-MillenniumFirePro(Martinez).W&H-CourtCall	72.00	723.00
General...	04/04/2025	4/4/2025	MillenniumFirePro(Martinez).W&H	241265 MillenniumFirePro(Marti...	11911736-MillenniumFirePro(Martinez).W&H-CourtCall	72.00	795.00
Bill	08/05/2024	850594939	MillenniumFirePro(Martinez).W&H	Thomson Reuters-West Publishi...	Legal Research-MillenniumFirePro(Martinez).W&H	129.91	924.91
Total 502500 · Legal Expenses						924.91	924.91
502700 · Mediation Fees							
Bill	03/07/2024	(03/06/24)	MillenniumFirePro(Martinez).W&H	Todd Smith, Esq., APC	(03/06/24)-MillenniumFirePro(Martinez).W&H-Mediation Fee sked 0...	10,000.00	10,000.00
Total 502700 · Mediation Fees						10,000.00	10,000.00
503200 · Process Service Fees							
Bill	09/08/2023	63974	MillenniumFirePro(Martinez).W&H	Valpro Attorney Services, LLC	63974-MillenniumFirePro(Martinez).W&H Servee Millennium Fire Pr...	70.00	70.00
Bill	09/08/2023	63975	MillenniumFirePro(Martinez).W&H	Valpro Attorney Services, LLC	63975-MillenniumFirePro(Martinez).W&H Servee Millennium Fire Pr...	150.00	220.00
Bill	12/01/2023	68349	MillenniumFirePro(Martinez).W&H	Valpro Attorney Services, LLC	68349 MillenniumFirePro(Martinez).W&H-Servee: Millennium Fire P...	64.45	284.45
Bill	12/01/2023	68350	MillenniumFirePro(Martinez).W&H	Valpro Attorney Services, LLC	68350 MillenniumFirePro(Martinez).W&H-Servee: Millennium Fire P...	144.45	428.90
Total 503200 · Process Service Fees						428.90	428.90
503300 · Professional Fees							
Bill	08/08/2024	12043	MillenniumFirePro(Martinez).W&H	Berger Consulting Group, LLC	12043-MillenniumFirePro(Martinez).W&H-2.50 hours of work	1,625.00	1,625.00
Total 503300 · Professional Fees						1,625.00	1,625.00
Total 500000 · COS						16,499.81	16,499.81
TOTAL						16,499.81	16,499.81