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

SANDI ORTIZ CUEVAS and MARIA L.
YANEZ ZEPEDA, individually, on behalf of all
others similarly situated, and on behalf of the
State of California and other aggrieved persons;
JOSE LUIS RAMIREZ, individually, and on
behalf of all others similarly situated,

Plaintiffs,

v.

TMI AUTOMOTIVE PRODUCTS INC., a
California corporation; TMI PRODUCTS, INC.,
a California corporation; IPC IMPORT PARTS
CONNECTION INC., A California corporation;
and DOES 1 through 10,
inclusive,

Defendants.

Case No.: CVRI2304340

*[Assigned for all purposes to the Hon.
Harold W. Hopp, Dept. 1]*

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

Final Approval Hearing:

Date: August 14, 2026

Time: 8:30 a.m.

Dept.: 1

Complaint filed: August 21, 2023

Trial date: None set

DECLARATION OF JOHN G. YSLAS

I, John G. Yslas, declare as follows:

1. I am an attorney at law licensed to practice before all 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 Sandi Ortiz Cuevas, Jose Luis Ramirez, and Maria Yanez Zepeda (“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 and District Courts. From matters representing both plaintiffs and defendants,
11 I have successfully mediated the resolution of many wage and hour class, collective, and
12 representative actions. Since starting to settle cases in late April 2023 I have already successfully
13 mediated matters in which I have been counsel or co-counsel resulting in **well over \$280 million**
14 in settlements and verdicts that are in the process of being finalized, with numerous upcoming
15 mediations scheduled. In those and numerous other matters, I have managed and assisted with the
16 litigation and settlement of many wage and hour PAGA and class actions for which I performed
17 similar tasks as those performed in the course of prosecuting this action. Indeed, I recently tried
18 and prevailed in achieving a jury verdict in a certified wage and hour class action in the matter of
19 *Aguilar-Flores v. Javier's – CC LLC*, Los Angeles County Superior Court, Case No.
20 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. Arrash T. Fattahi is a Partner at Wilshire Law Firm, PLC. Mr. Fattahi graduated
8 summa cum laude from the University of California, Los Angeles with a Bachelor of Arts in
9 Political Science. He received his Juris Doctor from The George Washington University Law
10 School, where he was a member of the student editorial board for the Federal Circuit Bar Journal.
11 Mr. Fattahi’s practice is focused on advocating for the rights of consumers and employees in class
12 action litigation. He is currently the managing attorney in charge of litigating several class action
13 cases in state and federal courts in California. As the attorney responsible for day-to-day
14 management of this matter at the Wilshire Law Firm, PLC, Mr. Fattahi has over five years of
15 experience litigating wage and hour class actions. Over the past five plus years, Mr. Fattahi has
16 managed and assisted with the litigation and settlement of several wage and hour class actions.
17 In those class actions, he performed tasks similar to those performed in the course of prosecuting
18 this action. Mr. Fattahi was selected as a “Southern California Rising Star” in 2025 and 2026. Mr.
19 Fattahi’s current contingent billing rate of \$850.00 per hour is consistent with the legal market,
20 accepted hourly rates, and his expertise and knowledge as it pertains to wage and hour matters.

21 12. Arman A. Salehi is a third-year Associate Attorney at Wilshire Law Firm, PLC. He
22 was admitted to practice law in California in 2023. Mr. Salehi graduated from the University of
23 California, Los Angeles with a Bachelor of Arts in Sociology. He received his Juris Doctor from
24 the University of California College of the Law, San Francisco (formerly known as U.C. Hastings).
25 Since November 2023, his practice has focused mainly on wage and hour class action litigation.
26 He currently bills at an hourly rate of \$600.00.

27 13. Alan Wilcox is a Senior Attorney at WLF. He graduated from the University of
28 California, Berkeley in 2007. He graduated from Pepperdine University’s School of Law and

1 became a member of the California State Bar in 2012. Throughout his career, Alan has represented
2 clients in both state and federal Courts in a wide variety of matters, including contract disputes,
3 wrongful foreclosure, unlawful detainer, divorce, product defect, tort, and employment matters.
4 From 2014 to the present, he has practiced complex civil litigation exclusively, representing
5 plaintiff employees in employment matters. He has handled both individual wrongful discharge
6 and collective wage and hour actions, with the class action and PAGA matters including *Flores v.*
7 *Aqua Terra Culinary, Inc.*, Monterey Superior Court Case No. 17CV002672, *Garcia v.*
8 *Construction Innovations Group, LLC*, Sacramento Superior Court Case No. 34-2020-00285239,
9 *Kim v. Sheraton Operating Corp.*, Central District of California Case No. 2:17-cv-09247-FMO-E,
10 *Pease v. Wattrans, Inc.*, San Bernardino Superior Court Case No. CIVDS1919832, and *Lachman*
11 *v. Berlitz Languages, Inc.*, Los Angeles Superior Court Case No. 19STCV01533, among others.
12 His current hourly billing rate is \$950.00 per hour.

13 14. Karen L. Wallace is a Senior Settlement Attorney at WLF. She earned a Ph.D. in
14 English at the University of California, Los Angeles, and taught literature and writing for many
15 years. She returned to school in 2007 and earned a J.D. with a public service distinction from
16 Southwestern Law School in 2010, when she was admitted to the California State Bar. Her
17 practice has focused on complex wage and hour and consumer cases on behalf of plaintiffs, and
18 she has litigated class and representative actions in both state and federal courts throughout
19 California.

20 15. WLF's hourly rates are comparable to those charged by other class action
21 plaintiffs' counsel and the firms defending class actions. WLF's rates are well within the range
22 of hourly rates that the Los Angeles legal marketplace would compensate counsel for similar
23 services accomplishing similar results. For example, in *Bronshteyn v. State of California*, Los
24 Angeles County Superior Ct. No. 19SMCV00057, Order Granting Plaintiff's Motion for
25 Statutory Attorneys' Fees and Costs filed March 30, 2023, an employment action brought by two
26 small law firms (Levy, Vinick, Burrell & Hyams LLP and Law Offices of Wendy Musell), the
27 court found that counsel's 2022 hourly rates of \$1,100 and \$1,000 per hour were reasonable for
28 the plaintiff's five senior attorneys, including \$1,000 per hour for the plaintiff's 23-year lead

1 counsel and \$850 per hour for a senior associate. These rates were then augmented by a 1.75
2 lodestar multiplier and affirmed by the California Court of Appeals. The rates (and multiplier)
3 requested here are well in line with those found reasonable in *Bronshteyn*. In *Tran v. Golden State*
4 *FC LLC, et al.* (LASC Case No. BC699931), Fee Order filed 4/8/2022, the court found hourly
5 rates of \$1,300 per hour reasonable for plaintiff's 32-year attorney and \$1,000 per hour reasonable
6 for a 14-year attorney. The negative multiplier here is even more compelling given Class Counsel
7 represents approximately 147 Class Members.

8 16. WLF has been approved as class counsel by courts in California. *See, e.g., Matthew*
9 *Veliz v. DrinkPak, LLC*, Los Angeles County Superior Court, Case No. 22STCV37384, *Ismael*
10 *Villegas-Sanchez v. COE Orchard Equipment, Inc.*, Sutter County Superior Court, Case No.
11 CVCS22-0002261; *Jessica Bronsal v. PTI Technologies Inc.*, Ventura County Superior Court,
12 Case No. 202200570361CUOE; *Miguel A. Vigil Ruiz v. The De Ruosi Group, LLC*, San Joaquin
13 County Superior Court, Case No. STK-CV-UOE-2022-8780; *Gutierrez v. Top Drawer Merch,*
14 *LLC et al*, Los Angeles County Superior Court, Case No. 23STCV04299; *Wing v. Road*
15 *Machinery, LLC et al*, Kern County Superior Court, Case No. BCV-22-102896; *Hernandez v.*
16 *SGPS Showrig Los Angeles, Inc.*, Los Angeles County Superior Court, Case No. 22STCV28155;
17 *Azevedo v. Tulare Nursing & Rehabilitation Hospital, Inc.*, Tulare County Superior Court, Case
18 No. VCU293325; *Haser v. Universal Chain of California, Inc.*, Sacramento County Superior
19 Court, Case No. 34-2022-00332268; *Caldera v. Performance Online, Inc. et al*, Riverside County
20 Superior Court, Case No. CVRI2306013; *Goosby v. CiminoCare, Inc.*, Sacramento County
21 Superior Court, Case No. 34-2022-00329033; *Rooks v. Hot Cakes Restaurant Group, Inc.*, San
22 Joaquin County Superior Court, Case No. STK-CV-UOE-2022-11056; *Garcia v. Compassionate*
23 *Heart*, Orange County Superior Court, Case No. 30-2022-01294409-CU-OE-CXC; *Parra v.*
24 *Citrus Valley Management Services, Inc.*, Riverside County Superior Court, Case No.
25 CVRI2301768; *Torres v. HomeShield Pest Control Inc.*, Placer County Superior Court, Case No.
26 S-CV-0049525; *Cabrera v. Creekside Auto Group*, Santa Clara County Superior Court, Case No.
27 23CV415661; *Simpson v. Arcos*, Riverside Superior Court, Case No. CVRI2303337; *Payne v.*
28 *Planned Parenthood: Shasta-Diablo, Inc.*, San Francisco County Superior Court, Case No. CGC-

23-607359. The total hours expended on this action are reasonable and in line with those expended in comparable cases.

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

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

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

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

c. The Real Rate Report does not provide 1st quartile or 4th quartile rates, presumably to provide a sense of the average attorney billing rates. Importantly, the third quartile represents the point below which 75% of rates fall; it is not a cap on reasonable rates. By definition, a substantial portion of partners in the relevant benchmark market routinely bill above that level, particularly those with extensive experience, specialized expertise, or leadership roles in complex litigation. Courts evaluating fee requests recognize that leading counsel in complex or representative actions may reasonably bill above median or third-quartile benchmarks where their experience, results obtained, and responsibilities justify higher rates. We firmly believe WLF belongs in the 4th quartile of attorney billing rates in 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 \$280 million in just the last three years since starting to settle matters as a plaintiffs’

1 attorney. My credentials and experience place my \$1,500 hourly rate within the highest tier of
2 Los Angeles employment litigators, consistent with rates that would fall within the fourth quartile
3 beyond those reported in the Real Rate Report.

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

- 7 a. the investigation of the matter, including meeting with Plaintiffs, reviewing
8 Defendant's policies, and requesting and reviewing Plaintiffs' time and pay
9 records, personnel files, and exploring Defendant's corporate structure;
- 10 b. filing the Action;
- 11 c. attending status conferences and meeting and conferring with Defendant
12 regarding the case;
- 13 d. meeting and conferring with Defendant regarding mediation, exchange of
14 informal discovery beforehand, and negotiating regarding the parameters
15 thereof;
- 16 e. selecting a mediator and mediation date;
- 17 f. working with opposing counsel for the receipt of a representative sampling
18 and analyzing the same with the aid of a consultant and Plaintiffs to perform
19 analyses of liability and exposure prior to the mediation in this matter;
- 20 g. reviewing Defendant's policy documents and researching applicable defenses;
- 21 h. preparing the mediation brief and damages model for use at mediation;
- 22 i. attending the mediation;
- 23 j. communicating with Plaintiffs regarding this matter;
- 24 k. negotiating, finalizing, and fully executing the settlement agreement;
- 25 l. preparing and filing the Motion for Preliminary Approval and supporting
26 documents;
- 27 m. attending the hearing on Motion for Preliminary Approval;
- 28 n. communicating with any Class Member who sought additional information

1 regarding the settlement, including answering questions and obtaining updated
2 addresses for purposes of receiving the Class Notice and administering the
3 settlement checks; and

4 o. preparing the instant Motion for Final Approval and supporting documents.

5 20. WLF's current lodestar reflects the efficiencies achieved by attorneys experienced
6 in this field with **165.7** hours of work resulting in **\$134,035.00** in fees. The chart below shows the
7 calculation of hours spent by each of WLF's attorneys on this case:

Attorney	Hours	Hourly Rate	Total
John G. Yslas	14.5	\$1,500.00	\$21,750.00
Arrash T. Fattahi	67.5	\$850.00	\$57,375.00
Arman A. Salehi	70.3	\$600.00	\$42,180.00
Alan Wilcox	5.6	\$950.00	\$5,320.00
Karen L. Wallace	7.8	\$950.00	\$7,410.00
TOTAL	165.7		\$134,035.00

17
18 21. Co-counsel Blackstone Law, APC's current lodestar reflects 258.5 hours of work
19 performed by attorneys similarly experienced in this field resulting in \$247,031.00 in fees. *See*
20 the concurrently filed Declaration of Alexandra Rose ("Rose Decl.") ¶ 16.

21 22. Co-counsel Torus LLP's current lodestar reflects 142.6 hours of work performed
22 by attorneys similarly experienced in this field resulting in \$73,786.15 in fees. *See* the
23 concurrently filed Declaration of David Alami ("Alami Decl.") ¶¶ 17, 18.

24 23. These amounts, totaling \$454,852.15 for all Class Counsel, far surpass the
25 requested fee award of \$180,666.67, resulting in a negative multiplier of approximately 2.52.
26 Class Counsel's lodestar does not include the time Class Counsel will spend at the Final Approval
27 Hearing and assisting the Administrator following final approval. Class Counsel dedicated
28 significant resources to this case by dividing the tasks required according to skill level. The hours

1 expended by each attorney were not duplicative and reflect the extensive investigation and
2 analysis that was required to achieve this Settlement. This time could have been spent on other
3 potentially lucrative cases. Class Counsel's lodestar reflects the efficiencies achieved by attorneys
4 experienced in this field. Moreover, Class Counsel has singularly assumed the risk and costs of
5 litigation purely on a contingency basis. And, while Plaintiffs are confident in the merits of their
6 claims, a legitimate controversy exists as to each cause of action, posing an actual risk that
7 Plaintiffs may not succeed at class certification and/or trial. Any of these obstacles could have
8 prevented recovery completely, meaning Class Counsel would have been left with no
9 compensation for all the time and money invested in litigating this case. Despite these risks, Class
10 Counsel took this case on a contingency basis so that Class Members (a particularly vulnerable
11 group of hourly paid workers) could be compensated for their unpaid wages. Consequently, Class
12 Counsel was precluded from focusing on, or taking on, other cases which could have resulted in
13 a larger, and less risky, monetary gain.

14 24. In litigation costs, WLF has spent \$9,829.59, Blackstone Law, APC has spent
15 \$11,251.26, and Torus LLP has spent \$5,616.15 (\$26,697.00 total) on items such as filing fees,
16 service fees, mediation fees, and consultant fees. Since Class Counsel's costs do not exceed the
17 maximum of \$45,000, **the remaining \$18,303.00** will revert to the Net Settlement Amount. A
18 true and correct copy of WLF's cost reports in this matter is attached as **Exhibit 2**. Plaintiffs'
19 total costs include those in WLF's cost reports as well as the anticipated \$60.00 filing fee to file
20 this Motion. All the costs incurred were reasonable and necessary for the prosecution of this case.

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

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

25 \\\

26 \\\

27 \\\

28 \\\

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

3 Executed on July 21, 2026, at Los Angeles, California.

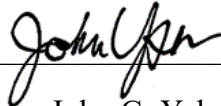
4
5 
6 John G. Yslas

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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- New York, NY
- Philadelphia, PA
- San Francisco, CA
- Washington, DC

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NOTE:

You may experience an issue that can sometimes occur in PDF viewer. Thin lines (like table borders) may appear to “disappear” or look broken when zoomed out in a PDF viewer. This is usually a display/rendering issue rather than a problem with the actual content of the PDF.

Solution:

- Open the PDF in Acrobat and go to Edit > Preferences > Page Display.
- 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.

See clearly. Spend wisely.

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

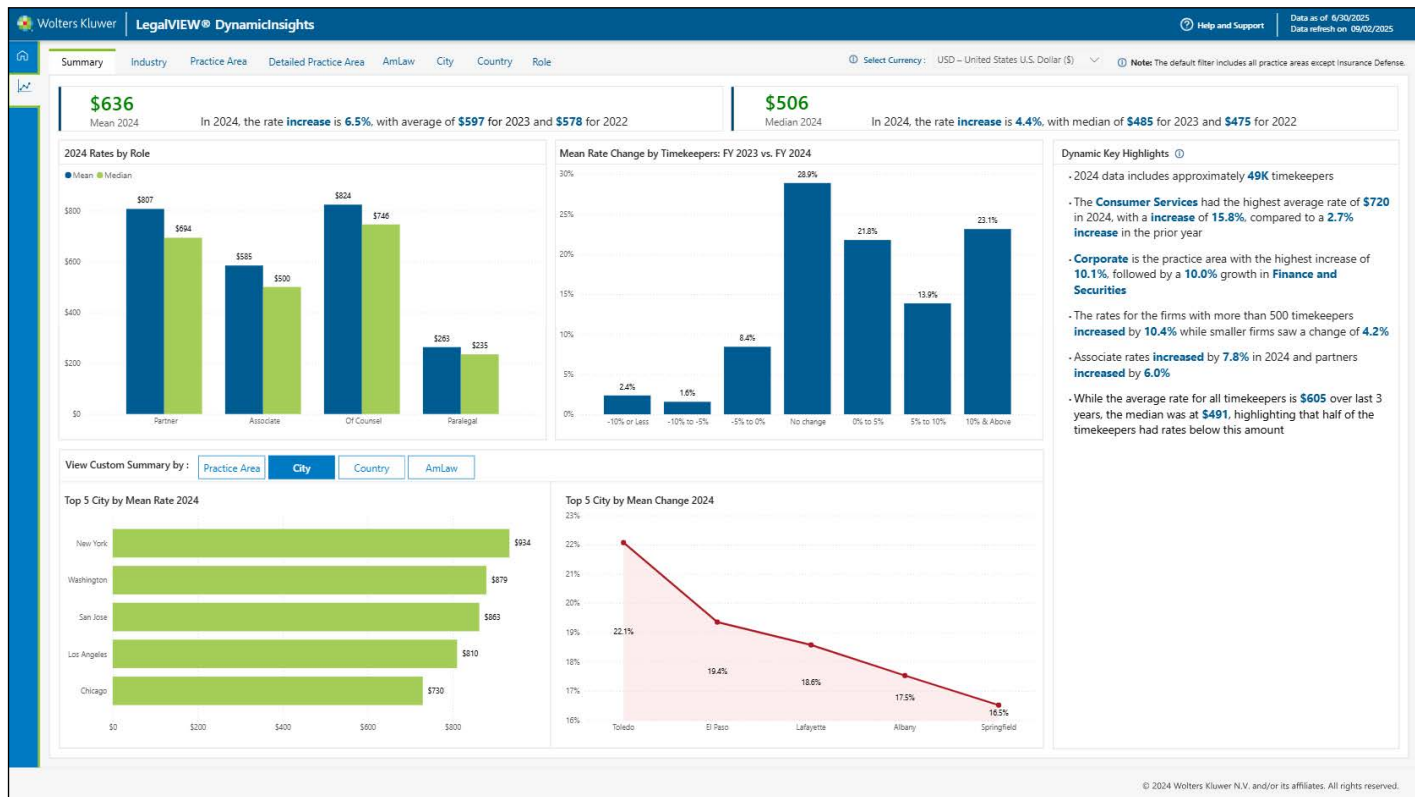
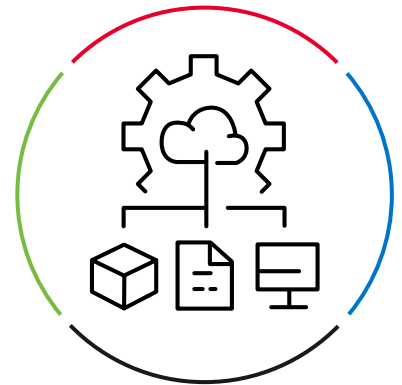


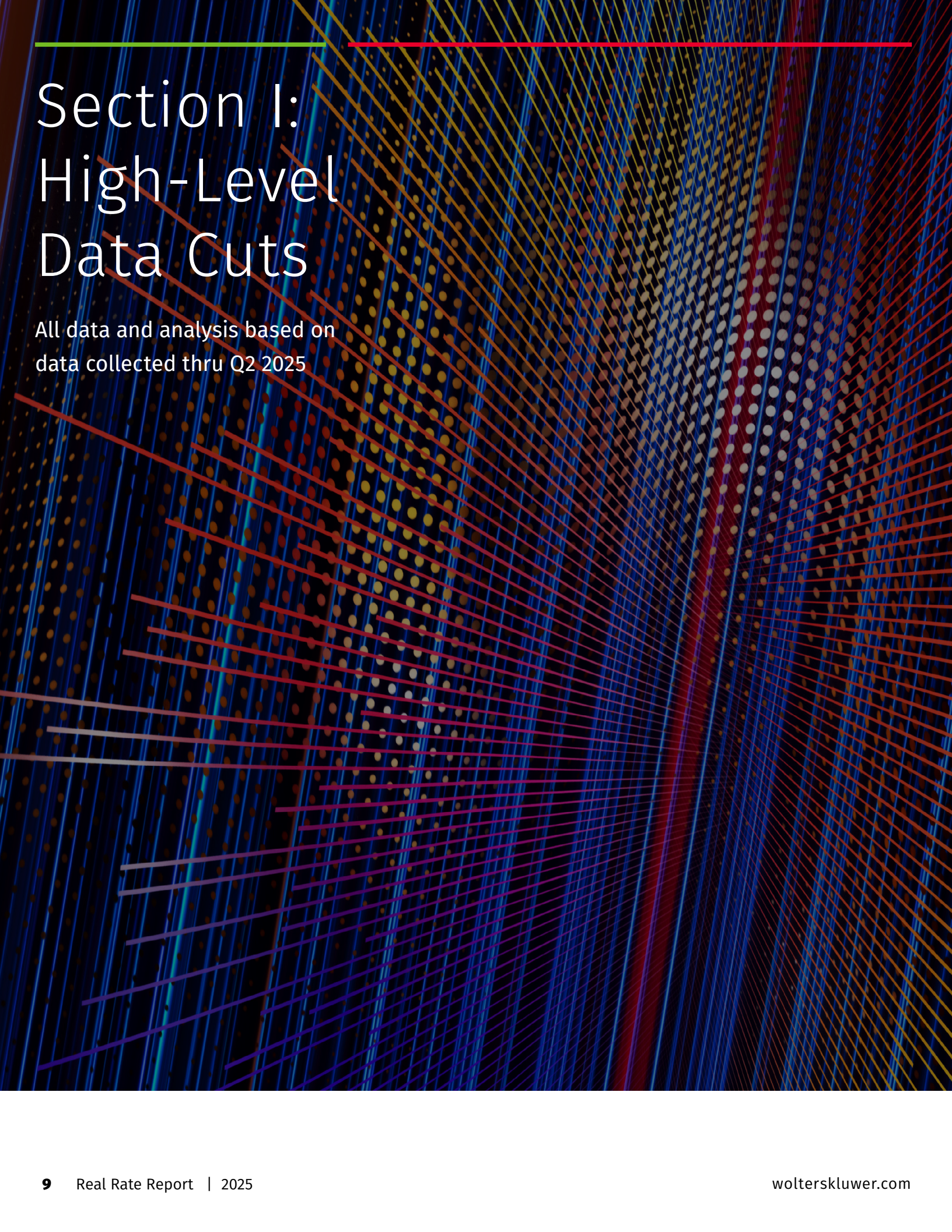
LegalVIEW® DynamicInsights

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

Wilshire Law Firm, PLC
Transaction Detail by Account
All Transactions

11/8/2024
Accrual Basis

Type	Date	Num	Memo	Description	Amount	Balance
COS						
Mediation Fees						
	3/24/2025	502700	Mediation- Barnes Dispute Resolution	1/3 Mediation Fee	\$2,667.00	\$2,667.00
Total MEDIATION FEES					\$2,667.00	\$2,667.00
Consultant Fees						
	4/3/2025	12459-2	Consultant Fee- Berger Consulting Group, LLC	16.60 hours	\$4,108.50	\$4,108.50
Total CONSULTANT FEES					\$4,108.50	\$4,108.50
Filing Fees						
	08/21/2023	21049123	Filing Fee - One Legal LLC	S&C	\$1,510.02	\$1,510.02
	09/25/2023	502500	Filing Fee- Department of Industrial Relations	PAGA Notice	\$75.00	\$1,585.02
	10/16/2023		Document Purchase- Riverside Superior Court	Document Retrieval	\$25.00	\$1,610.02
	10/18/2023	66490	Process Service- ValPro Attorney Services, LLC	Service	\$145.00	\$1,755.02
	10/20/2023	66526	Filing Fee Valpro Attorney Services, LLC	POS	\$45.00	\$1,800.02
	11/07/2023		Document Purchase- Riverside Superior Court	Document Retrieval	\$17.50	\$1,817.52
	11/07/2023		Document Purchase- Riverside Superior Court	Document Retrieval	\$14.00	\$1,831.52
	12/01/2023	21729263	Filing Fee - One Legal LLC	Case Management Statement	\$18.27	\$1,849.79
	12/11/2023	21778782	Filing Fee - One Legal LLC	Ntc of posting Jury Fees	\$172.70	\$2,022.49
	01/16/2024	22016229	Filing Fee - One Legal LLC		\$20.33	\$2,042.82
	01/19/2024	22020151	Filing Fee - One Legal LLC	Case Management Statement	\$19.30	\$2,062.12
	03/19/2024	22477123	Filing Fee - One Legal LLC	Stipulation and Proposed Order	\$15.39	\$2,077.51
	03/19/2024	22480874	Filing Fee - One Legal LLC	Stipulation and Proposed Order	\$39.89	\$2,117.40
	04/04/2024	22555927	Filing Fee - One Legal LLC	Notice	\$19.30	\$2,136.70
	04/16/2024		Document Purchase- Riverside Superior Court	Document Retrieval	\$15.50	\$2,152.20
	04/18/2024	22714864	Filing Fee - One Legal LLC	Oppo,Obj,Decl,POS	\$19.30	\$2,171.50
	04/22/2024	22734258	Filing Fee - One Legal LLC	Case Management Statement	\$19.30	\$2,190.80
	05/09/2024		Document Purchase- Riverside Superior Court	Document Retrieval	\$2.00	\$2,192.80
	05/24/2024		Document Purchase- Riverside Superior Court	Document Retrieval	\$2.00	\$2,194.80
	06/06/2024	22555927(2)	Filing Fee - One Legal LLC		\$1.00	\$2,195.80
	08/12/2024		Document Purchase- Riverside Superior Court	Document Retrieval	\$21.50	\$2,217.30
	09/25/2024	23804472	Filing Fee - One Legal LLC	Stipulation and Proposed Order	\$16.47	\$2,233.77
	09/25/2024	23805848	Filing Fee - One Legal LLC	Stipulation and Proposed Order, POS	\$42.64	\$2,276.41
	10/17/2024	23932655	Filing Fee - One Legal LLC	Notice	\$21.99	\$2,298.40
	04/17/2025	25167296	Filing Fee - One Legal LLC	Stipulation and Proposed Order, POS	\$44.71	\$2,343.11
	07/23/2025	CC073125TA-2972	Filing Fee - One Legal LLC	Stipulation and Proposed Order	\$44.71	\$2,387.82
	10/09/2025	CC103125TA-0702	Filing Fee - One Legal LLC	Stipulation and Proposed Order	\$44.71	\$2,432.53
	11/08/2025	CC113025TA-1184	Filing Fee - One Legal LLC	Case Management Statement	\$23.02	\$2,455.55
	01/07/2026	CC013126TA-0404	Filing Fee - One Legal LLC	Declaration	\$1.04	\$2,456.59
	01/13/2026	CC013126TA-0780	Filing Fee - One Legal LLC	Amended Complaint	\$24.12	\$2,480.71
	01/13/2026	CC013126TA-0781	Filing Fee - One Legal LLC	POS	\$18.58	\$2,499.29
	01/13/2026	CC013126TA-0784	Filing Fee - One Legal LLC	Motion for Final Approval	\$90.36	\$2,589.65
	01/14/2026	CC013126TA-1049	Filing Fee - One Legal LLC	Proposed Order	\$24.12	\$2,613.77
	01/16/2026	CC013126TA-1460	Filing Fee - One Legal LLC	Document Retrieval	\$15.00	\$2,628.77
	01/16/2026	CC013126TA-1461	Filing Fee - One Legal LLC	Document Retrieval	\$1.00	\$2,629.77
	01/21/2026	CC013126TA-1645	Filing Fee - One Legal LLC	Declaration	\$27.22	\$2,656.99
	01/26/2026	CC013126TA-2035	Filing Fee - One Legal LLC	POS	\$24.12	\$2,681.11
	02/27/2026	CC022826TA-2334	Filing Fee - One Legal LLC	Case Management Statement	\$24.12	\$2,705.23
	03/26/2026	CC033126TA-2406	Filing Fee - One Legal LLC	Declaration, POS, Proposed Order	\$26.19	\$2,731.42
	03/27/2026	CC033126TA-2538	Filing Fee - Riverside Court Epay	Document Retrieval	\$3.00	\$2,734.42
	04/09/2026	CC043026TA-0990	Filing Fee - Riverside Court Epay	Document Retrieval	\$14.00	\$2,748.42
	FUTURE		Filing Fee - One Legal LLC	MFA and Compliance Dec	\$300.00	\$3,048.42
Total FILING FEES					\$3,048.42	\$3,048.42
Other Costs						
	8/22/2023	E-3168292	Docusign Envelope		\$1.89	\$1.89
	9/12/2024	E-3240417	Docusign Envelope		\$1.89	\$3.78
	9/26/2024	E-3240416	Docusign Envelope		\$1.89	\$5.67
Total OTHER COSTS					\$5.67	\$5.67
TOTAL					\$9,829.59	\$9,829.59