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11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **FOR THE COUNTY OF SACRAMENTO**
13

14 SANDRA YAQUINTO, an individual, on behalf
15 of herself and others similarly situated,

16 Plaintiff,

17 v.

18 UNICO ENGINEERING INC., a California
19 corporation; and DOES 1 through 10, inclusive,

20 Defendants.
21
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23
24
25
26
27
28

Case No.: 23CV009174

Consolidated with Case No.: 24CV013737

Assigned for All Purposes to:
Hon. Lauri A. Damrell
Dept. 8B

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

Final Approval Hearing:

Date: September 18, 2026

Time: 9:00 a.m.

Dept.: 8B

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 Plaintiff Sandra Yaquinto (“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 **\$280 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. Eugene Zinovyev is a Junior Partner at WLF. He graduated from the University of
8 California Berkeley with a Bachelor of Arts in Political Economy of Industrial Societies, and
9 received his Juris Doctor from the University of California, San Francisco School of Law in 2009.
10 He has practiced employment and wage and hour law since on both the plaintiff and defense sides.
11 Mr. Zinovyev has tried multiple jury cases to verdict as well as numerous bench trials. He has
12 also briefed published appellate court decisions in both state and federal court. Mr. Zinovyev is
13 admitted to practice before all Federal District Courts in California as well as the 9th Circuit
14 Court of Appeals. He is also a member of the California Employment Lawyers Association. He
15 has mediated and settled dozens of class and representative actions as well as individual civil
16 matters. Mr. Zinovyev’s hourly billing rate is \$950.00.

17 12. John Brown is an Associate Attorney at WLF. He was admitted to practice law in
18 the State of California in 2004. Mr. Brown graduated from UC Berkeley with a Bachelor of Arts
19 and received his Juris Doctor from UCLA School of Law. His current practice has been focused
20 on class action employment law. Mr. Brown has participated in dozens of settlements totaling
21 tens of millions of dollars, from the memorandum of understanding and settlement agreement
22 drafting stage through to final approvals from the court. Mr. Brown’s hourly billing rate is
23 \$650.00.

24 13. Gabriella Solé is an Associate Attorney at Wilshire Law Firm, PLC. She was
25 admitted to practice law in the State of California in 2022. Ms. Solé graduated from University
26 of California, Los Angeles with a Bachelor of Arts in Sociology. She received her Juris Doctor
27 from University of San Francisco, School of Law. During law school, she was a First Year Moot
28 Court Director on the Moot Court Board. Since graduating, her practice has been mainly focused

1 on wage and hour class action litigation. Ms. Solé’s hourly billing rate is \$550.00.

2 14. Lisa B. Iturriaga was a Settlement Attorney at Wilshire Law Firm, PLC. She was
3 admitted to practice law in the State of California in 2021. Ms. Iturriaga graduated from
4 University of South Florida with a Bachelor of Science in Finance and a Bachelor of Arts in
5 Marketing. She received her Juris Doctor from Chapman University Dale E. Fowler School of
6 Law. Since graduating, her practice has been in insurance defense (previously) and employment
7 law (currently). Since 2023, she has exclusively worked on Plaintiff-side wage and hour cases.
8 Ms. Iturriaga is also a member of the California Employment Lawyers Association (CELA). Ms.
9 Iturriaga billed at an hourly rate of \$600.00.

10 15. Lucy H. Nguyen is a Settlement Attorney at WLF. She graduated from San
11 Francisco State University with a Bachelor of Science degree in Business Management and
12 earned her Juris Doctor from John F. Kennedy University, School of Law in 2011. Ms. Nguyen
13 was admitted to practice law in the State of California in 2021. Prior to joining WLF, Ms. Nguyen
14 practiced employment and family law litigation and handled a high-volume statewide docket
15 involving wage-and-hour disputes and complex litigation matters. Since joining WLF, Ms.
16 Nguyen has focused her practice on wage-and-hour class actions and representative actions under
17 the California Private Attorneys General Act (“PAGA”), including drafting and negotiating class
18 and PAGA settlements, approval motions, and related settlement documents. In this and other
19 matters, Ms. Nguyen has performed work including analyzing exposure, drafting settlement
20 agreements and approval papers, coordinating settlement administration issues, and assisting with
21 class and PAGA settlement approval proceedings. Ms. Nguyen currently bills at an hourly rate of
22 \$650.00.

23 16. WLF’s hourly rates are comparable to those charged by other class action plaintiffs’
24 counsel and the firms defending class actions. WLF’s rates are well within the range of hourly
25 rates that the Northern California legal marketplace would compensate counsel for similar services
26 accomplishing similar results. For example, in *Bronshteyn v. State of California*, Los Angeles
27 County Superior Ct. No. 19SMCV00057, Order Granting Plaintiff’s Motion for Statutory
28 Attorneys’ Fees and Costs filed March 30, 2023, an employment action brought by two small law

1 firms (Levy, Vinick, Burrell & Hyams LLP and Law Offices of Wendy Musell), the court found
2 that counsel's 2022 hourly rates of \$1,100 and \$1,000 per hour were reasonable for the plaintiff's
3 five senior attorneys, including \$1,000 per hour for the plaintiff's 23-year lead counsel and \$850
4 per hour for a senior associate. These rates were then augmented by a 1.75 lodestar multiplier and
5 affirmed by the California Court of Appeals. The rates (and multiplier) requested here are well in
6 line with those found reasonable in *Bronshteyn*. In *Tran v. Golden State FC LLC, et al.* (LASC
7 Case No. BC699931), Fee Order filed 4/8/2022, the court found hourly rates of \$1,300 per hour
8 reasonable for plaintiff's 32-year attorney and \$1,000 per hour reasonable for a 14-year attorney.
9 The rates requested here are further supported by the fact that Class Counsel represents
10 approximately 161 Class Members.

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

1 *Cabrera v. Creekside Auto Group*, Santa Clara County Superior Court, Case No. 23CV415661;
2 *Simpson v. Arcos*, Riverside Superior Court, Case No. CVRI2303337; *Payne v. Planned*
3 *Parenthood: Shasta-Diablo, Inc.*, San Francisco County Superior Court, Case No. CGC-23-
4 607359. The total hours expended on this action are reasonable and in line with those expended in
5 comparable cases.

6 18. In cases in which WLF has been approved as class counsel, California courts have
7 approved rates similar to those requested by WLF in the instant case. *See, e.g., Rodolfo Ponce v.*
8 *Youbar, Inc.*, Los Angeles County Superior Court, Case No. 22STCV37519 (WLF's rates were
9 approved as follows: John G. Yslas (\$1,500.00), Samantha A. Smith (\$1,000.00), Jeffrey C. Bils
10 (\$850.00), Aram Boyadjian (\$600.00), Lisa B. Iturriaga (\$550.00), and Andrew Sandoval
11 (\$500.00)); *Sabrina N. Batres v. Wish Automotive II, Inc. dba Infiniti of Van Nuys*, Los Angeles
12 County Superior Court, Case No. 23STCV19968 (WLF's rates were approved as follows: John G.
13 Yslas (\$1,500.00), Jeffrey C. Bils (\$850.00), Aram Boyadjian (\$600.00), Lisa B. Iturriaga
14 (\$550.00), and Andrew Sandoval (\$500.00)); *Diandrea Correa et al. v. CareMeridian, LLC, et.*
15 *al.*, Los Angeles County Superior Court, Case No. 23STCV10707 (WLF's rates were approved as
16 follows: John G. Yslas (\$1,500.00), Samantha A. Smith (\$1,000.00), Jeffrey C. Bils (\$850.00),
17 Fawn F. Bekam (\$800.00), Diego Aviles (\$800.00), Aram Boyadjian (\$600.00), Harry Erganyan
18 (\$600.00), Lisa B. Iturriaga (\$550.00), and Andrew Sandoval (\$500.00)); *Carlos Santos Granados*
19 *v. Sunny Hills Management Co., Inc.*, Los Angeles County Superior Court, Case No.
20 23STCV02109 (WLF's rates were approved as follows: John G. Yslas (\$1,500.00), Samantha A.
21 Smith (\$1,000.00), Jeffrey C. Bils (\$850.00), Diego Aviles (\$750.00), Courtney M. Miller
22 (\$650.00), Aram Boyadjian (\$600.00), Harry Erganyan (\$600.00), Mariam Nazaretyan (\$550.00),
23 Lisa B. Iturriaga (\$550.00), and Andrew Sandoval (\$500.00)); *Kayla Kurges v. Khanna*
24 *Enterprises, Ltd. dba Sheraton Agoura Hills*, Los Angeles County Superior Court, Case No.
25 24STCV01590 (WLF's rates were approved as follows: John G. Yslas (\$1,500.00), Jeffrey C. Bils
26 (\$850.00), Aram Boyadjian (\$600.00), Lisa B. Iturriaga (\$550.00), and Andrew Sandoval
27 (\$500.00)); *Thora Magney et al. v. Levi Strauss & Co., et al.*, Los Angeles County Superior Court,
28 Case No. 24STCV02320 (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), Fawn F. Bekam (\$800.00), Aram
2 Boyadjian (\$600.00), Lisa B. Iturriaga (\$550.00), and Andrew Sandoval (\$500.00)); *Armando*
3 *Muniz, et al. v. Lot LLC, dba Lot Management LLC (fka Red Cow, Inc.) et. al.*, Los Angeles County
4 Superior Court, Case No. 22STCV32901 (WLF's rates were approved as follows: John G. Yslas
5 (\$1,500.00), Samantha A. Smith (\$1,000.00), Jeffrey C. Bills (\$850.00), Diego Aviles (\$750.00),
6 Aram Boyadjian (\$600.00), Harry Erganyan (\$600.00), Mariam Nazaretyan (\$550.00), Lisa B.
7 Iturriaga (\$550.00), and Andrew Sandoval (\$500.00)); *George Munoz v. Century West, LLC dba*
8 *Century West BMW*, Los Angeles County Superior Court, Case No. 23STCV04247 (WLF's rates
9 were approved as follows: John G. Yslas (\$1,500.00), Samantha A. Smith (\$1,000.00), Jeffrey C.
10 Bills (\$850.00), Aram Boyadjian (\$600.00), Lisa B. Iturriaga (\$550.00), and Andrew Sandoval
11 (\$500.00)); *Ivan S. Martinez II et. al. v. The Haar Company, et. al.*, Los Angeles County Superior
12 Court, Case No. 23STCV21651 (WLF's rates were approved as follows: John G. Yslas (\$1,500.00),
13 Samantha A. Smith (\$1,000.00), Jeffrey C. Bills (\$850.00), Diego Aviles (\$750.00), Aram
14 Boyadjian (\$600.00), Harry Erganyan (\$600.00), Mariam Nazaretyan (\$550.00), Lisa B. Iturriaga
15 (\$550.00), and Andrew Sandoval (\$500.00)).

16 19. In support of the reasonableness of WLF's hourly rates, attached as **Exhibit 1** is a
17 true and correct excerpt from the *2025 Real Rate Report* published by Wolters Kluwer. The Real
18 Rate Report is widely relied upon in the legal industry because it is derived from anonymized
19 billing data taken from actual law firm invoices that were submitted to clients and approved for
20 payment, rather than from voluntary surveys or self-reported rates. Although the report refers to
21 "2025" rates, the data reflects rates charged by law firms during the first half of 2024 and therefore
22 represents the most recent available objective evidence of prevailing market rates.

23 a. The report provides rate information filtered by geographic market, practice
24 type, and timekeeper role. Page 26 reports third-quartile rates for attorneys handling litigation
25 matters in San Francisco and San Jose, which are the primary Northern California legal markets
26 and serve as the dominant rate-setting centers for complex litigation throughout the region. In San
27 Francisco, the dataset shows third-quartile hourly rates of \$1,378 for litigation partners and \$875
28 for associates. In San Jose, the report shows third-quartile hourly rates of \$1,250 for litigation

1 partners and \$1,030 for associates. The report's in-depth city analyses for San Francisco and San
2 Jose further confirm that these markets consistently reflect some of the highest billing rates in the
3 country for experienced litigators and serve as the benchmark markets for Northern California legal
4 services. Courts evaluating fee requests in Sacramento routinely look to the prevailing rates in the
5 nearest major metropolitan markets as benchmarks when assessing reasonableness. The closest and
6 most relevant comparison markets for Sacramento litigation are San Francisco and San Jose, where
7 experienced partners routinely bill well above \$1,200 per hour based on rates actually charged to
8 clients.

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

19 c. The Real Rate Report does not provide 1st quartile or 4th quartile rates,
20 presumably to provide a sense of the average attorney billing rates. Importantly, the third quartile
21 represents the point below which 75% of rates fall; it is not a cap on reasonable rates. By definition,
22 a substantial portion of partners in the relevant benchmark market routinely bill above that level,
23 particularly those with extensive experience, specialized expertise, or leadership roles in complex
24 litigation. Courts evaluating fee requests recognize that leading counsel in complex or
25 representative actions may reasonably bill above median or third-quartile benchmarks where their
26 experience, results obtained, and responsibilities justify higher rates. We firmly believe WLF
27 belongs in the 4th quartile of attorney billing rates in Northern California. As previously discussed,
28 WLF is a nationally recognized employment litigation firm that has been named one of the nation's

1 *Best Law Firms* by U.S. News & World Report and Best Lawyers since 2020, and its attorneys
2 regularly litigate complex wage-and-hour class and representative actions throughout California. I
3 am a UCLA School of Law graduate with nearly three decades of experience litigating labor and
4 employment matters—including as a partner and holding leadership roles at major international
5 law firms when I was on the defense side for 26 years, as well as substantial recent class and
6 representative action results including being one of the few attorneys in the state of California to
7 try a wage and hour class action to verdict (and prevail), and achieving results exceeding \$280
8 million in just the last three years since starting to settle matters as a plaintiffs’ attorney. My
9 credentials and experience place my \$1,500 hourly rate within the highest tier of Northern
10 California employment litigators, consistent with rates that would fall within the fourth quartile
11 beyond those reported in the Real Rate Report.

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

- 15 a. investigating the matter, including meeting with Plaintiff and reviewing
16 thousands of pages of documents and data produced by Defendant, including
17 class data, Plaintiff’s personnel file, Defendant’s employee handbook and wage-
18 and-hour policies, job descriptions, and timekeeping and payroll records;
- 19 b. filing the Action;
- 20 c. prosecuting the class and PAGA actions, including Plaintiff’s October 30, 2024
21 deposition and proceedings relating to consolidation of the two actions;
- 22 d. meeting and conferring with Defendant regarding mediation and the exchange
23 of discovery and data necessary to evaluate the claims;
- 24 e. preparing for and participating in the July 30, 2025 all-day mediation before
25 Russ J. Wunderli, Esq.;
- 26 f. working with Berger Consulting Group to analyze Defendant’s timekeeping and
27 payroll data and quantify potential exposure for the asserted wage-and-hour
28 claims;

- g. reviewing policy documents from Defendant and researching applicable defenses;
- h. preparing the mediation brief and damages model for use at mediation;
- i. communicating with Plaintiff;
- j. negotiating, finalizing and fully executing the settlement agreement;
- k. preparing and filing the Motion for Preliminary Approval and supporting documents;
- l. reviewing and addressing the Court's tentative ruling and preparing supplemental materials required by the Court, including a supplemental declaration, revised Class Notice, and revised proposed order, resulting in preliminary approval of the Settlement;
- m. communicating with any Class Members who sought additional information regarding the settlement; and
- n. preparing the instant Motion for Final Approval and supporting documents.

21. WLF's current lodestar reflects the efficiencies achieved by attorneys experienced in this field with 197.7 hours of work resulting in \$165,500.00 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	18.7	\$1,500.00	\$28,050.00
Eugene Zinovyev	91.6	\$950.00	\$87,020.00
Gabriella Solé	56.3	\$550.00	\$30,965.00
Lisa B. Iturriaga	15.0	\$600.00	\$9,000.00
Lucy H. Nguyen	16.1	\$650.00	\$10,465.00
TOTAL	197.7		\$165,500.00

22. This amount surpasses the requested fee award of \$47,500.00, resulting in a negative multiplier. Class Counsel's lodestar does not include the time Class Counsel will spend at the Final

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

16 23. In litigation costs, Wilshire Law Firm, PLC, has spent \$15,371.01 on items such as
17 filing fees, service fees, mediation fees, and expert fees. A true and correct copy of a breakdown
18 of costs incurred by my office is attached hereto as **Exhibit 2**. Additionally, we anticipate incurring
19 \$300.00 in future costs for filing fees and service fees for a total of \$15,671.01 in costs. Since Class
20 Counsel's costs did not reach the maximum of \$20,000.00, the remaining \$4,328.99 will revert to
21 and increase the Net Settlement Amount. These costs were reasonable and necessary to prosecute
22 this case and obtain the results achieved.

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

25 ///

26 ///

27 ///

28 ///

EXHIBIT 1



ELM Solutions

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analysis of law firm rates,
trends, and practices

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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

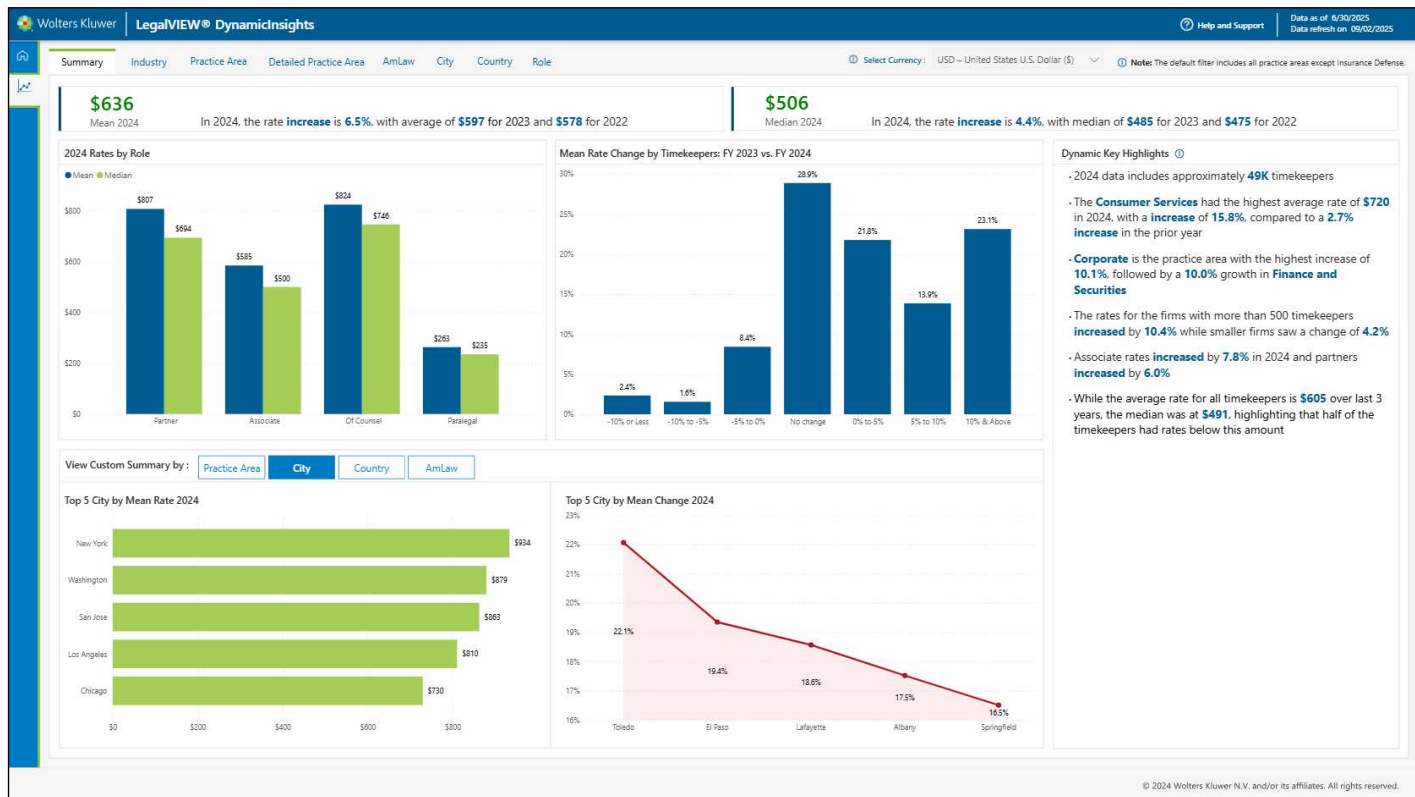
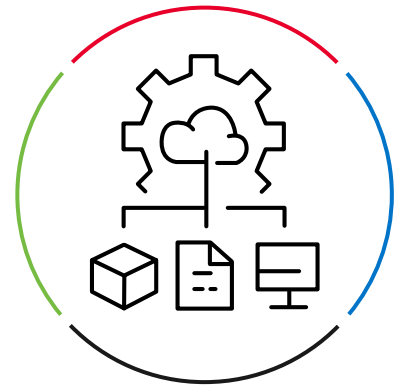


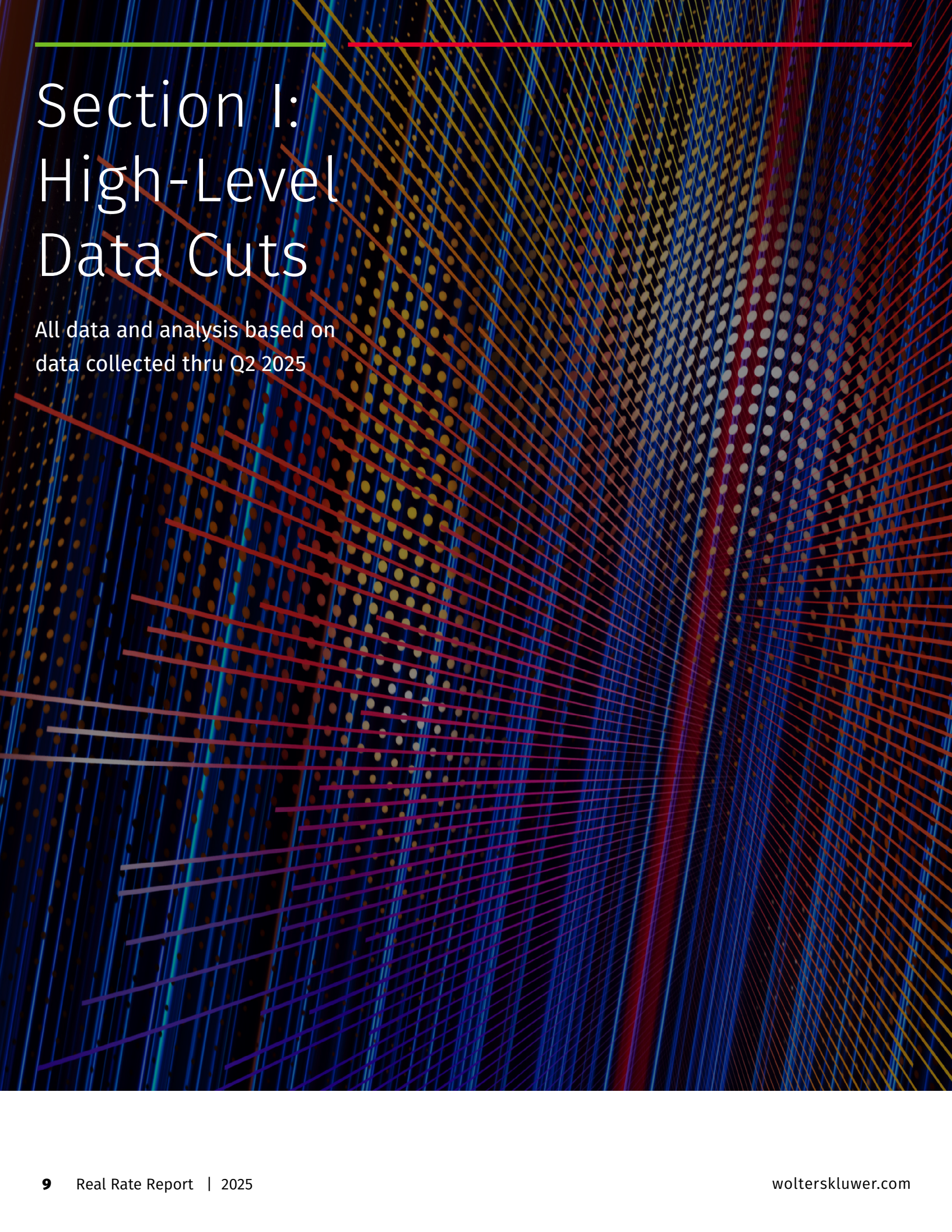
LegalVIEW® DynamicInsights

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

Unico Engineering, Inc. (Yaquinto) – Class Counsel Cost Reconciliation

Class Counsel litigation costs incurred and anticipated future filing/service costs.

Source	Category / Vendor	Reference	Amount
QB	Mediation fees	Judicate West – Invoice 658566	\$5,250.00
NS	Consultant / expert fees	Berger Consulting Group LLC – Invoice 14460	\$4,995.00
QB / NS	Filing and service fees		\$5,126.01
COSTS INCURRED TO DATE			\$15,371.01
Anticipated future filing/service costs			\$300.00
TOTAL INCLUDING ANTICIPATED FUTURE COSTS			\$15,671.01

Expenses Subtotals - Filtered Exp. Type

As of 2026-08-10 09:21:37 Pacific Standard Time/PST • Generated by Saul Solares

Filtered By
Show: All matters
Matter: ID equals a0LPc000000E113
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.
Sandra Yaquinto - Wage & Hour: 7/13/2023	DTF	8/9/2023	E-3156075		Docusign Envelope	\$1.89			\$1.89
	Subtotal	Sum				\$1.89	\$0.00	\$0.00	\$1.89
		Count	1						
	E108 — Postage	5/29/2024	E-3205363			\$1.63			\$1.63
		11/15/2023	E-3159159			\$7.90			\$7.90
		11/15/2023	E-3159157			\$7.90			\$7.90
		8/30/2023	E-3141634			\$7.18			\$7.18
		8/30/2023	E-3141633			\$7.18			\$7.18
	Subtotal	Sum				\$31.79	\$0.00	\$0.00	\$31.79
		Count	5						
	Subtotal	Sum				\$33.68	\$0.00	\$0.00	\$33.68
		Count	6						
Total		Sum				\$33.68	\$0.00	\$0.00	\$33.68
		Count	6						

			Type	Date	Num	Class	Source Name	Memo	Amount	Balance
500000 · COS										
501500 · Court Filing Fees										
			Bill	07/15/2024	78852	UnicoEngineeringInc(Yaquinto).W	Valpro Attorney Services, LLC	78852-UnicoEngineeringInc(Yaquinto).W&H-File PO	45.00	45.00
			Credit Card Charge	10/03/2023	21293220	UnicoEngineeringInc(Yaquinto).W	One Legal LLC	21293220-199931-Sandra Yaquinto v Unico Enginee	1,626.61	1,671.61
			Credit Card Charge	05/29/2024	23007371	UnicoEngineeringInc(Yaquinto).W	One Legal LLC	23007371-Posting JF ntc,CMS-Atty Svc for Court Fil	179.03	1,850.64
			Credit Card Charge	06/21/2024	23168204	UnicoEngineeringInc(Yaquinto).W	One Legal LLC	23168204-199931-Atty Svc for Court Filing-Notice-Ur	20.49	1,871.13
			Credit Card Charge	07/10/2024	23299846	UnicoEngineeringInc(Yaquinto).W	One Legal LLC	23299846-199931-Atty Svc for Court Filing-Sum & C	1,495.76	3,366.89
			Credit Card Charge	07/12/2024	23301479	UnicoEngineeringInc(Yaquinto).W	One Legal LLC	23301479-199931-Atty Svc for Court Filing-Sum & C	154.43	3,521.32
			Credit Card Charge	07/12/2024	23313278	UnicoEngineeringInc(Yaquinto).W	One Legal LLC	23313278-199931-Atty Svc for Court Filing-POS-Uni	18.43	3,539.75
			Credit Card Charge	08/08/2024	23482506	UnicoEngineeringInc(Yaquinto).W	One Legal LLC	23482506-199931-Atty Svc for Court Filing-Ntc of Ap	18.43	3,558.18
			Credit Card Charge	08/08/2024	23482706	UnicoEngineeringInc(Yaquinto).W	One Legal LLC	23482706-199931-Atty Svc for Court Filing-Ntc of Ap	18.43	3,576.61
			Credit Card Charge	10/10/2024	23909405	UnicoEngineeringInc(Yaquinto).W	One Legal LLC	23909405-199931-Atty Svc for Court Filing-CMS-Uni	25.24	3,601.85
			Credit Card Charge	12/31/2024	24410825	UnicoEngineeringInc(Yaquinto).W	One Legal LLC	24410825-199931-Atty Svc for Court Filing-CMS-Uni	26.28	3,628.13
			Credit Card Charge	01/27/2025	24568535	UnicoEngineeringInc(Yaquinto).W	One Legal LLC	24568535-199931-Atty Svc for Court Filing-Amendec	26.28	3,654.41
			Credit Card Charge	03/07/2025	24866441	UnicoEngineeringInc(Yaquinto).W	One Legal LLC	24866441-199931-Atty Svc for Court Filing-CMS-Uni	27.31	3,681.72
Total 501500 · Court Filing Fees									3,681.72	3,681.72
501600 · Court Reporters										
			Bill	11/25/2024	40096666	UnicoEngineeringInc(Yaquinto).W	Huseby, LLC	40096666-UnicoEngineeringInc(Yaquinto).W&H-Tran	964.00	964.00
Total 501600 · Court Reporters									964.00	964.00
502500 · Legal Expenses										
			Credit Card Charge	11/17/2023		UnicoEngineeringInc(Yaquinto).W	Department of Industrial Relations	ORD-000260269 (199931) UnicoEngineeringInc(Yaqi	75.00	75.00
			Bill	09/14/2023	848896021	UnicoEngineeringInc(Yaquinto).W	Thomson Reuters-West Publishing Corp	Legal Research-UnicoEngineeringInc(Yaquinto).W&H	14.21	89.21
			Bill	09/03/2024	850711723	UnicoEngineeringInc(Yaquinto).W	Thomson Reuters-West Publishing Corp	Legal Research-UnicoEngineeringInc(Yaquinto).W	47.41	136.62
			Bill	11/05/2024	851007765	UnicoEngineeringInc(Yaquinto).W	Thomson Reuters-West Publishing Corp	Legal Research-UnicoEngineeringInc(Yaquinto).W	105.54	242.16
			Bill	01/10/2025	851299443	UnicoEngineeringInc(Yaquinto).W	Thomson Reuters-West Publishing Corp	Legal Research-UnicoEngineeringInc(Yaquinto).W	239.72	481.88
Total 502500 · Legal Expenses									481.88	481.88
502700 · Mediation Fees										
			Bill	03/24/2025	658566	UnicoEngineeringInc(Yaquinto).W	Judicate West	658566-UnicoEngineeringInc(Yaquinto).W-50% Med	5,250.00	5,250.00
Total 502700 · Mediation Fees									5,250.00	5,250.00
503200 · Process Service Fees										
			Bill	07/11/2024	78824	UnicoEngineeringInc(Yaquinto).W	Valpro Attorney Services, LLC	78824-UnicoEngineeringInc(Yaquinto).W&H-Servee l	143.00	143.00
Total 503200 · Process Service Fees									143.00	143.00
Total 500000 · COS									10,520.60	10,520.60
TOTAL									10,520.60	10,520.60

Account	Type	Date	Num	Name	Memo	Line Memo	Amount	Status	Matter Display Name
501500 Cost of Sale : Court Filing Fees	Credit Card	8/4/2025	CC083125TA-1026	One Legal LLC	25979305-199931-Atty Svc for Court Filing-Change of Address-Sandra Yaquinto-7/13/2023	25979305-199931-Atty Svc for Court Filing-Change of Address-Sandra Yaquinto-7/13/2023	25.24		Unico Engineering, Inc. (Yaquinto) - Wage & Hour (Class Action)
501500 Cost of Sale : Court Filing Fees	Credit Card	8/13/2025	CC083125TA-1341	One Legal LLC	26055985-199931-Atty Svc for Court Filing-CMS-Sandra Yaquinto-7/13/2023	26055985-199931-Atty Svc for Court Filing-CMS-Sandra Yaquinto-7/13/2023	25.24		Unico Engineering, Inc. (Yaquinto) - Wage & Hour (Class Action)
501500 Cost of Sale : Court Filing Fees	Credit Card	11/20/2025	CC113025TA-1804	One Legal LLC	26825893-199931-Atty Svc for Court Filing-CMS-Sandra Yaquinto-7/13/2023	26825893-199931-Atty Svc for Court Filing-CMS-Sandra Yaquinto-7/13/2023	23.18		Unico Engineering, Inc. (Yaquinto) - Wage & Hour (Class Action)
501500 Cost of Sale : Court Filing Fees	Credit Card	4/3/2026	CC043026TA-0215	One Legal LLC	27878817-Atty Svc for Court Filing-Motion for Preliminary Approval of Settlement-Sandra Yaquinto-199931	27878817-Atty Svc for Court Filing-Motion for Preliminary Approval of Settlement-Sandra Yaquinto-199931	88.44		Unico Engineering, Inc. (Yaquinto) - Wage & Hour (Class Action)
501500 Cost of Sale : Court Filing Fees	Credit Card	4/6/2026	CC043026TA-0569	One Legal LLC	27888524-Atty Svc for Court Filing-Declaration-Sandra Yaquinto-199931	27888524-Atty Svc for Court Filing-Declaration-Sandra Yaquinto-199931	25.31		Unico Engineering, Inc. (Yaquinto) - Wage & Hour (Class Action)
501500 Cost of Sale : Court Filing Fees	Credit Card	4/13/2026	CC043026TA-1083	One Legal LLC	27957561-Atty Svc for Court Filing-Notice-Sandra Yaquinto-199931	27957561-Atty Svc for Court Filing-Notice-Sandra Yaquinto-199931	26.34		Unico Engineering, Inc. (Yaquinto) - Wage & Hour (Class Action)
501500 Cost of Sale : Court Filing Fees	Credit Card	5/4/2026	CC053126TA-0153	One Legal LLC	28132323-Atty Svc for Court Filing-Declar,Prop Ord,POS-Sandra Yaquinto-199931	28132323-Atty Svc for Court Filing-Declar,Prop Ord,POS-Sandra Yaquinto-199931	24.27		Unico Engineering, Inc. (Yaquinto) - Wage & Hour (Class Action)
501500 Cost of Sale : Court Filing Fees	Credit Card	5/8/2026	CC053126TA-0444	One Legal LLC	28177483-Atty Svc for Court Filing-Prop Ord,POS-Sandra Yaquinto-199931	28177483-Atty Svc for Court Filing-Prop Ord,POS-Sandra Yaquinto-199931	24.27		Unico Engineering, Inc. (Yaquinto) - Wage & Hour (Class Action)
502700 Cost of Sale : Mediation Fees	Bill	6/30/2025	658566	Judicate West	658566-UnicoEngineeringInc(Yaquinto)W-50% Mediation Fees sked 07/30/25	658566-UnicoEngineeringInc(Yaquinto)W-50% Mediation Fees sked 07/30/25	5,250.00	Paid In Ful	Unico Engineering, Inc. (Yaquinto) - Wage & Hour (Class Action)
503300 Cost of Sale : Professional Fees	Bill	8/7/2025	14460	Berger Consulting Group LLC	14460-Unico Engineering, Inc. (Yaquinto)-11.10 hours of work	14460-Unico Engineering, Inc. (Yaquinto)-11.10 hours of work	4,995.00	Paid In Ful	Unico Engineering, Inc. (Yaquinto) - Wage & Hour (Class Action)
Total							10,507.29		