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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF CONTRA COSTA

DANIEL THOMAS ATALIG HOCOG and
ALFRED ESTRADA SANTOS JR.,
individually, and on behalf of all others similarly
situated, and on behalf of the State of California
and other aggrieved persons,

Plaintiffs,

v.

SERVICE MANAGEMENT SYSTEMS, INC., a
Tennessee corporation; and DOES 1 through 10,
inclusive,

Defendants.

Case No.: C23-02424

Assigned for all purposes to:
Hon. Benjamin T. Reyes II
Dept. 16

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

Final Approval Hearing:

Date: August 12, 2026

Time: 9:00 a.m.

Dept.: 16

Action Filed: September 26, 2023

FAC Filed: August 26, 2025

DECLARATION OF JOHN G. YSLAS

I, John G. Yslas, declare as follows:

1. I am an attorney at law licensed to practice before all of the courts of the State of California. I am a Senior Partner at Wilshire Law Firm, PLC (“WLF” or “Class Counsel”), counsel of record for Plaintiffs Daniel Thomas Atalig Hocog and Alfred Estrada Santos Jr. (collectively “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 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. **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
11 Law Review. Mr. Bils served as a Judicial Extern for the Hon. Consuelo Bland Marshall in United
12 States District Court for the Central District of California, and also for the Hon. Sandra R. Klein
13 of United States Bankruptcy Court for the Central District of California. Mr. Bils graduated
14 ranked No. 7 in his graduating class from UCLA School of Law. He was admitted to practice law
15 in the State of California in 2014. Since graduating from law school, he has focused his legal
16 work primarily on employment matters, including wage-and-hour class action and PAGA
17 representative action litigation, and he has helped obtain dozens of settlements on behalf
18 California workers, as well as on behalf of California employers during his years on the defense
19 bar. Mr. Bils is a member of the Beverly Hills Bar Association (BHBA), where he is a past
20 member of the Board of Governors and a past Chair of the Labor & Employment Law Section
21 Executive Committee. He is also a member of the California Employment Lawyers Association
22 (CELA) and the Consumer Attorneys Association of Los Angeles (CAALA). Mr. Bils’ hourly
23 billing rate is \$900.00.

24 12. **Samantha A. Smith** was a Senior Attorney at WLF where her practice was focused
25 on managing wage and hour class action and PAGA settlements. Ms. Smith was admitted to the
26 California Bar in December of 2004, and received a J.D. from University of California, Hastings
27 College of the Law and a B.A. from University of California, Davis. Ms. Smith has dedicated her
28 21-year career to plaintiff-side class action litigation. Her wealth of experience includes

1 successful work on all stages of class action litigation, including class action appeals, class
2 certification motions, and class settlements. See, e.g., *Blue Diamond Growers Product Labeling*
3 *Cases*, JCCP No. 4822 (Los Angeles County Superior Court) (false advertising of Blue Diamond
4 food products); *Adam vs. eHealth, Inc.*, Case No. 17CV309050 (Santa Clara County Superior
5 Court) (employee data breach); *Overton v. Armour-Eckrich Meats, LLC*, Case No.
6 CIVDS1501325 (San Bernardino County Superior Court) (unpaid wages, meal period and rest
7 break claims, and PAGA violations for non-exempt employees); *DeLeon et al. v. Westlake*
8 *Services, LLC*, Case No. BC 526750 (Los Angeles County Superior Court) (unpaid overtime,
9 meal period and rest break claims for call center employees); *Sawyer v. Retail Data, LLC*, Case
10 No. 30-2014-00753767-CU-OE-CXC (Orange County Superior Court) (unpaid wage and rest
11 break claims for piece rate workers); *Nguyen v. Pharmerica Corporation et al.*, Case No. 30-
12 2014-00716072-CU-OE-CXC (Orange County Superior Court) (unpaid wages and unreimbursed
13 expenses for pharmacists); *Laumea v. Performance Food Group, Inc.*, Case No. CIVDS1407509
14 (San Bernardino County Superior Court) (unpaid wages, meal and rest break claims for non-
15 exempt employees); *Durroh v. East West Bank*, Case No. BC528860 (Los Angeles County
16 Superior Court) (overtime claims for failure to include bonuses in regular rate of pay for bank
17 workers); *Gonzalez et al. v. SFFI Company, Inc. et al.*, Case No. CIVDS1504287 (San Bernardino
18 County Superior Court) (unpaid wages, meal period and rest break claims for non-exempt
19 employees). Ms. Smith billed at an hourly rate of \$1,000.00.

20 13. **Lucy H. Nguyen** is a Settlement Attorney at WLF. She graduated from San
21 Francisco State University with a Bachelor of Science degree in Business Management and
22 earned her Juris Doctor from John F. Kennedy University, School of Law in 2011. Ms. Nguyen
23 was admitted to practice law in the State of California in 2021. Prior to joining WLF, Ms. Nguyen
24 practiced employment and family law litigation and handled a high-volume statewide docket
25 involving wage-and-hour disputes and complex litigation matters. Since joining WLF, Ms.
26 Nguyen has focused her practice on wage-and-hour class actions and representative actions under
27 the California Private Attorneys General Act (“PAGA”), including drafting and negotiating class
28 and PAGA settlements, approval motions, and related settlement documents. In this and other

1 matters, Ms. Nguyen has performed work including analyzing exposure, drafting settlement
2 agreements and approval papers, coordinating settlement administration issues, and assisting with
3 class and PAGA settlement approval proceedings. Ms. Nguyen currently bills at an hourly rate of
4 \$650.00.

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

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

19 16. **Aram Boyadjian** was a fifth-year Associate Attorney at WLF. He was admitted to
20 practice law in the State of California in 2021. Mr. Boyadjian graduated from the University of
21 California, Los Angeles, with a Bachelor of Arts in Political Science. He received his Juris Doctor
22 from Loyola Law School. During law school, he was a member of the student editorial board for
23 the International and Comparative Law Review. Since January 2021, his practice has mainly been
24 focused on wage and hour class action litigation. Mr. Boyadjian billed at an hourly rate of
25 \$600.00.

26 17. **Andrew Sandoval** was a third-year Associate Attorney at WLF. He was admitted
27 to practice law in the State of California in 2022. Mr. Sandoval graduated from Azusa Pacific
28 University with a Bachelor of Arts in Economics. He received his Juris Doctor from Loyola Law

1 School. During law school, he was a Vice-President of La Raza de Loyola. Since graduating, his
2 practice has mainly been focused on wage and hour class action litigation. Mr. Sandoval billed at
3 an hourly rate of \$500.00.

4 18. WLF's hourly rates are comparable to those charged by other class action plaintiffs'
5 counsel and the firms defending class actions. WLF's rates are well within the range of hourly
6 rates that the Los Angeles legal marketplace would compensate counsel for similar services
7 accomplishing similar results. For example, in *Bronshteyn v. State of California*, Los Angeles
8 County Superior Ct. No. 19SMCV00057, Order Granting Plaintiff's Motion for Statutory
9 Attorneys' Fees and Costs filed March 30, 2023, an employment action brought by two small law
10 firms (Levy, Vinick, Burrell & Hyams LLP and Law Offices of Wendy Musell), the court found
11 that counsel's 2022 hourly rates of \$1,100 and \$1,000 per hour were reasonable for the plaintiff's
12 five senior attorneys, including \$1,000 per hour for the plaintiff's 23-year lead counsel and \$850
13 per hour for a senior associate. These rates were then augmented by a 1.75 lodestar multiplier and
14 affirmed by the California Court of Appeals. The rates (and multiplier) requested here are well in
15 line with those found reasonable in *Bronshteyn*. In *Tran v. Golden State FC LLC, et al.* (LASC
16 Case No. BC699931), Fee Order filed 4/8/2022, the court found hourly rates of \$1,300 per hour
17 reasonable for plaintiff's 32-year attorney and \$1,000 per hour reasonable for a 14-year attorney.
18 The multiplier here is even more compelling given Class Counsel represents approximately 320
19 Class Members.

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

1 *Tulare Nursing & Rehabilitation Hospital, Inc.*, Tulare County Superior Court, Case No.
2 VCU293325; *Haser v. Universal Chain of California, Inc.*, Sacramento County Superior Court,
3 Case No. 34-2022-00332268; *Caldera v. Performance Online, Inc. et al.*, Riverside County
4 Superior Court, Case No. CVRI2306013; *Goosby v. CiminoCare, Inc.*, Sacramento County
5 Superior Court, Case No. 34-2022-00329033; *Rooks v. Hot Cakes Restaurant Group, Inc.*, San
6 Joaquin County Superior Court, Case No. STK-CV-UOE-2022-11056; *Garcia v. Compassionate*
7 *Heart*, Orange County Superior Court, Case No. 30-2022-01294409-CU-OE-CXC; *Parra v. Citrus*
8 *Valley Management Services, Inc.*, Riverside County Superior Court, Case No. CVRI2301768;
9 *Torres v. HomeShield Pest Control Inc.*, Placer County Superior Court, Case No. S-CV-0049525;
10 *Cabrera v. Creekside Auto Group*, Santa Clara County Superior Court, Case No. 23CV415661;
11 *Simpson v. Arcos*, Riverside Superior Court, Case No. CVRI2303337; *Payne v. Planned*
12 *Parenthood: Shasta-Diablo, Inc.*, San Francisco County Superior Court, Case No. CGC-23-
13 607359. The total hours expended on this action are reasonable and in line with those expended in
14 comparable cases.

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

21. In support of the reasonableness of WLF's hourly rates, attached as **Exhibit 1** is a true and correct excerpt from the *2025 Real Rate Report* published by Wolters Kluwer. 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

1 payment, rather than from voluntary surveys or self-reported rates. Although the report refers to
2 “2025” rates, the data reflects rates charged by law firms during the first half of 2024 and therefore
3 represents the most recent available objective evidence of prevailing market rates.

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

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

28 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 Northern California. As previously discussed, WLF is a nationally recognized employment litigation firm that has been named one of the nation's *Best Law Firms* by U.S. News & World Report and Best Lawyers since 2020, and its attorneys regularly litigate complex wage-and-hour class and representative actions throughout California. I am a UCLA School of Law graduate with nearly three decades of experience litigating labor and employment matters—including as a partner and holding leadership roles at major international law firms when I was on the defense side for 26 years, as well as substantial recent class and representative action results including being one of the few attorneys in the state of California to try a wage and hour class action to verdict (and prevail), and achieving results exceeding \$225 million in just the last three years since starting to settle matters as a plaintiffs' attorney. My credentials and experience place my \$1,500 hourly rate within the highest tier of Northern California employment litigators, consistent with rates that would fall within the fourth quartile beyond those reported in the Real Rate Report.

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

- a. the investigation of the matter, including meeting with Plaintiffs, reviewing Defendant's policies, requesting and reviewing Plaintiffs' time and pay records, personnel files, and exploring the corporate structure of Defendant;
- b. researching applicable California wage-and-hour law, PAGA authority, arbitration issues, class certification standards, and Defendant's anticipated

- 1 defenses;
- 2 c. preparing, filing, and prosecuting the Class Action and subsequent
- 3 representative PAGA Action, including drafting the complaints and related
- 4 filings;
- 5 d. meeting and conferring with Defendant regarding mediation, exchange of
- 6 informal discovery beforehand, and negotiating with opposing counsel
- 7 regarding the parameters thereof;
- 8 e. coordinating and preparing for private mediation, including selecting a
- 9 mediator, negotiating the mediation process, exchanging informal discovery,
- 10 and preparing mediation materials;
- 11 f. working with Defendant's counsel to obtain representative payroll, timekeeping,
- 12 and employment data, and collaborating with an expert consultant, Berger
- 13 Consulting Group to analyze liability, damages, workweeks, pay periods, and
- 14 potential settlement exposure in preparation for mediation;
- 15 g. reviewing Defendant's employment policies, arbitration agreements, payroll
- 16 records, time records, and other documents produced in informal discovery, and
- 17 researching applicable legal and factual defenses;
- 18 h. preparing the confidential mediation brief and damages model for use at
- 19 mediation;
- 20 i. attending and participating in the full-day mediation and subsequent settlement
- 21 negotiations;
- 22 j. communicating with Plaintiffs who requested updates or other information
- 23 regarding this matter;
- 24 k. negotiating, revising, drafting, finalizing, and fully executing the Settlement
- 25 Agreement and subsequent amendments necessary to obtain Court approval;
- 26 l. preparing and filing the Motion for Preliminary Approval and supporting
- 27 documents;
- 28 m. attending the hearing on Motion for Preliminary Approval;

- n. communicating with Class Members who sought additional information regarding the settlement, including answering questions regarding the settlement and obtaining updated addresses from Class Members for purposes of receiving the Class Notice and administering the settlement checks; and
- o. preparing Plaintiffs' Motion for Final Approval and supporting documents.

23. WLF's current lodestar reflects the efficiencies achieved by attorneys experienced in this field with 148.8 hours of work resulting in \$125,975.00 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	26.6	\$1,500.00	\$39,900.00
Samantha A. Smith	8.0	\$1,000.00	\$8,000.00
Jeffrey C. Bils	31.3	\$900.00	\$28,170.00
Lucy H. Nguyen	12.5	\$650.00	\$8,125.00
Lisa B. Iturriaga	12.0	\$600.00	\$7,200.00
Aram Boyadjian	53.8	\$600.00	\$32,280.00
Andrew Sandoval	4.6	\$500.00	\$2,300.00
TOTAL	148.8		\$125,975.00

24. This amount surpasses the requested fee award of \$88,333.33, resulting in a negative multiplier of approximately 0.70. Class Counsel's lodestar does not include the time Class Counsel will spend at the Final Approval Hearing and assisting the Settlement Administrator following final approval. Class Counsel dedicated significant resources to this case by dividing the tasks required according to skill level. The hours expended by each attorney were not duplicative and reflect the extensive investigation and analysis that was required to achieve this Settlement. This time could have been spent on other potentially lucrative cases. Class Counsel's lodestar reflects the efficiencies achieved by attorneys experienced in this field. Moreover, Class Counsel has

1 singularly assumed the risk and costs of litigation purely on a contingency basis. While Plaintiffs
2 are confident in the merits of their claims, a legitimate controversy exists as to each cause of action,
3 posing an actual risk that Plaintiffs may not succeed at class certification and/or trial. Any of these
4 obstacles could have prevented recovery completely, meaning Class Counsel would have been left
5 with no compensation for all the time and money invested in litigating this case. Despite these
6 risks, Class Counsel took this case on a contingency basis so that Class Members (a particularly
7 vulnerable group of hourly paid workers) could be compensated for their unpaid wages.
8 Consequently, Class Counsel was precluded from focusing on, or taking on, other cases which
9 could have resulted in a larger, and less risky, monetary gain.

10 25. In litigation costs, Wilshire Law Firm, PLC, has incurred \$20,240.28 on items such
11 as filing fees, service fees, mediation fees, and expert fees. A true and correct copy of a breakdown
12 of costs incurred by my office is attached hereto as **Exhibit 2**. Additionally, we anticipate incurring
13 \$300.00 in anticipated future costs for filing fees and service fees for a total of \$20,540.28 in costs.
14 Pursuant to the Settlement Agreement, however, Class Counsel requests reimbursement of
15 \$20,000.00 in litigation costs.

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

18 27. To date, the LWDA has not responded to or objected to the Settlement in this matter.
19 I declare under penalty of perjury under the laws of the State of California that the foregoing
20 is true and correct.

21 Executed on July 20, 2026 at Los Angeles, California.

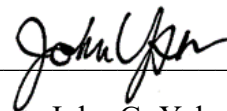
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EXHIBIT 1



ELM Solutions

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

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

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NOTE:

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.

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- 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

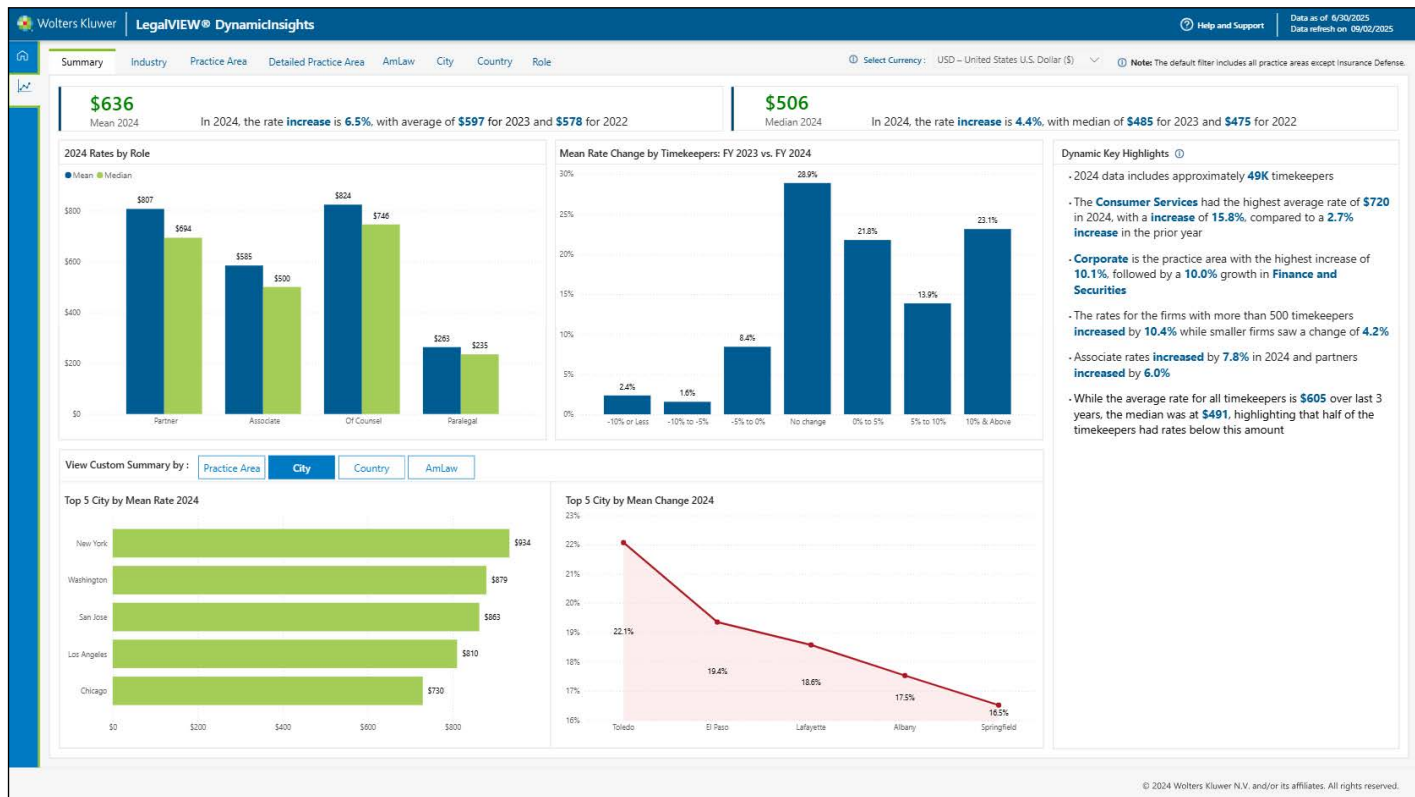
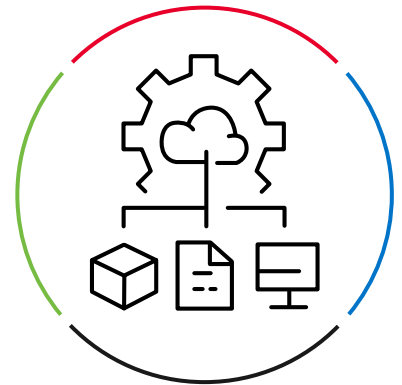


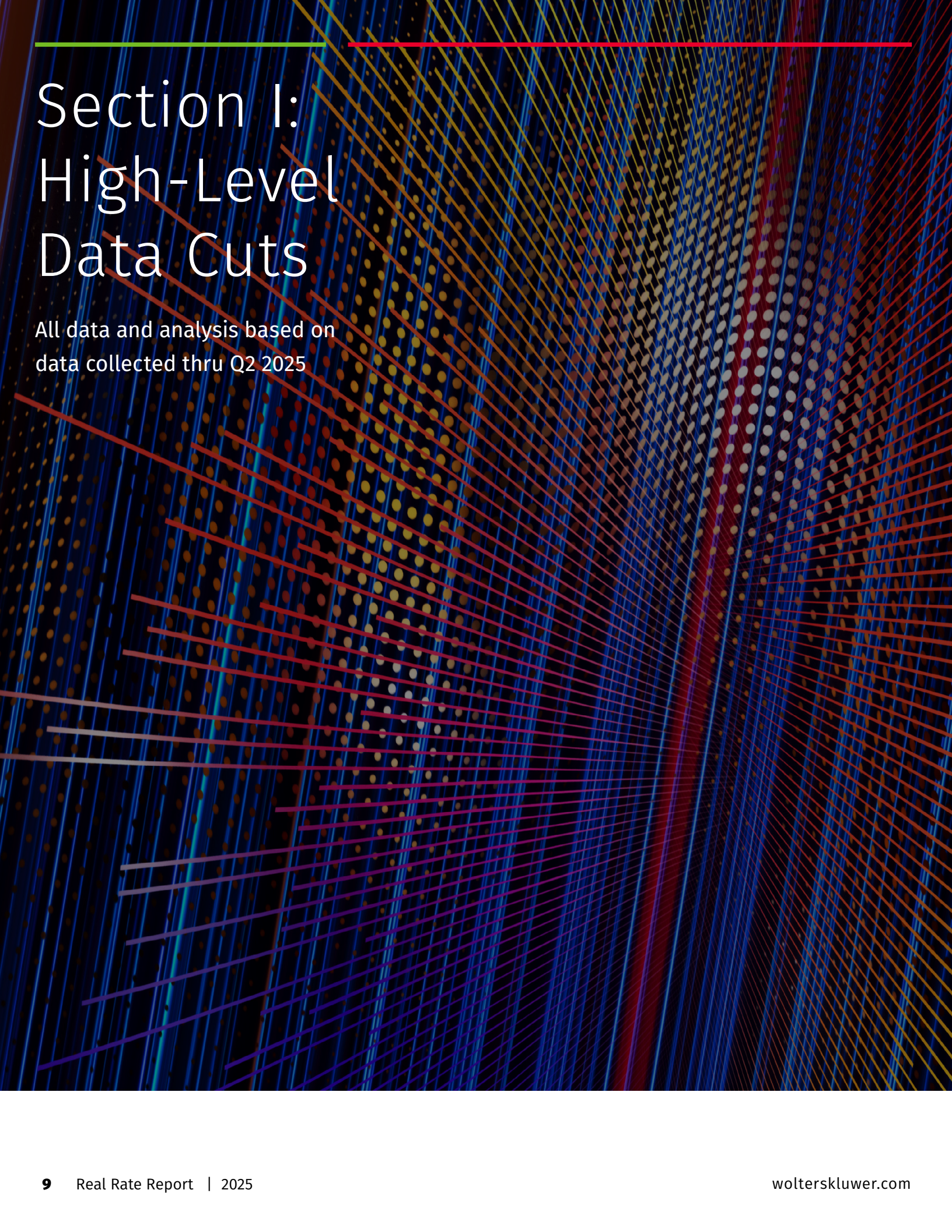
LegalVIEW® DynamicInsights

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 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

EXHIBIT 2: CLASS COUNSEL'S LITIGATION COST RECORDS

Daniel Thomas Atalig Hocog and Alfred Estrada Santos Jr. v. Service Management Systems, Inc. Case No. C23-02424

Category	Description	Amount
Court Filing & E-Filing Fees	One Legal and Valpro Attorney Services – filing, e-filing, notices, proofs of service, and related court costs	\$3,442.91
Mediation Fees	Lisa Klerman – mediation services	\$12,500.00
Expert Consultant Fees	Berger Consulting Group, LLC – expert consultant analysis	\$4,365.00
Process Service Fees	Valpro Attorney Services – service of process	\$140.00
Less: Legal Research (Excluded)	Thomson Reuters/Westlaw	(\$207.00)
Less: Postage (Excluded)	Postage	(\$0.63)
Total Recoverable Litigation Costs		\$20,240.28
Costs Requested Pursuant to Settlement	Capped by the Settlement Agreement and MPA Order	\$20,000.00