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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SANTA CLARA

JEFFERSON RODRIGUEZ, individually, and on behalf of other members of the general public similarly situated and on behalf of other aggrieved employees pursuant to the California Private Attorneys General Act,

Plaintiff,

vs.

STATEWIDE TRAFFIC SAFETY AND SIGNS, INC., a Delaware corporation now doing business as AWP SAFETY; TRAFFIC SOLUTIONS CORPORATION; and DOES 1 through 50, inclusive,

Defendants.

Case No. 23CV428021

CLASS ACTION

[Assigned for all purposes to the Hon. Theodore C. Zayner, Dept. 19]

DECLARATION OF TUVIA KOROBKIN IN SUPPORT OF PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT

Date: April 8, 2026
Time: 1:30 p.m.
Dept.: 19

Action Filed: December 22, 2023
Trial Date: None Set

I, TUVIA KOROBKIN, declare as follows:

1. I am an attorney at Marquee Law Group, A Professional Corporation, attorneys of record (along with our co-counsel) for Plaintiffs Jefferson Rodriguez, Danielle Andrea Perez, and Jesse Knight ("Plaintiffs") and the proposed Settlement Class in the above-captioned matter. I am a member in good standing of the bar of the State of California and am admitted to practice in this Court. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I am a 2009 graduate of the UCLA School of Law. I was admitted to the California State Bar in December 2009 after passing the bar exam on my first attempt. Since that time, I have practiced almost exclusively in the area of employment litigation. From May 2010 to May 2014, I worked as an associate at the employment law firm of Eisenberg & Associates in Los Angeles. From May 2014 to January 2016, I worked as an associate at the employment law firm of Setareh Law Group in Beverly Hills. The vast majority of my work at both Eisenberg & Associates and Setareh Law Group focused on representing employees in wage and hour and wrongful termination actions, including wage and hour class actions. Although non-exhaustive, the types of work I performed at those firms included: conducting client intakes; performing pre-filing research and analysis; drafting complaints; attending court hearings; corresponding with opposing counsel; drafting and responding to written discovery; taking and defending depositions; analyzing payroll and timekeeping records and employee handbooks; drafting and opposing a variety of motions including motions for summary judgment, motions for remand, demurrers and motions to dismiss, motions to compel, motions to quash, and motions for class certification; drafting mediation briefs and attending mediations; drafting long-form settlement agreements; drafting motions for preliminary and final settlement approval; and overseeing the claims and/or opt-out processes. I also drafted appellate briefs for the California Court of Appeal and the Ninth Circuit Court of Appeals, and argued before the California Court of Appeal, all in connection with employment matters.

3. In February 2016 I joined Haines Law Group, APC (HLG) in El Segundo, California, as an associate attorney. In December 2019 I was promoted to Partner, a position I

held until I resigned from HLG in July 2022. While at HLG, I performed many of the same duties identified in the preceding paragraph, and I also managed junior and mid-level associates. During my tenure with HLG I handled over 100 wage and hour class actions and Private Attorneys General Act ("PAGA") actions, resulting in more than $100 million in total settlements on behalf of California workers.

4. In July 2022 I joined Abramson Labor Group (ALG) as Senior Counsel in the firm's Class Action Department, where I grew the Class Action Department to approximately 80 active wage and hour class and PAGA actions throughout California. In addition to managing the caseload and day-to-day operations of the Class Action Department, I supervised associate attorneys and performed many of the same duties described in the two prior paragraphs.

5. In March 2024 I joined Marquee Law Group as Senior Counsel and Chair of the Class Action Department. I currently manage and play an active role in approximately 55 active wage and hour class actions and PAGA actions throughout California, and perform many of the same job duties as I performed in my prior roles, in addition to supervising other attorneys' work on those cases.

6. The following is a non-exhaustive list of wage and hour class action settlements in which I was appointed as class counsel and that have received final approval: *Bellinghausen v. Tractor Supply Company,* Case No. 3:13-cv-02377-JSC, U.S. District Court, Northern District of California, Judge Jacqueline Scott Corley presiding (granted final approval of settlement on behalf of retail employees involving claims for failure to provide meal and rest periods, failure to pay overtime, and other claims); *Montgomery v. Del Monte Corp.,* et al, Case No. 13C0204, Kings County Superior Court, Judge James LaPorte presiding (granted final approval of settlement on behalf of manufacturing employees involving claims for failure to provide meal and rest periods, failure to pay overtime, and other claims); *Tesla Motors Wage and Hour Litigation,* JCCP 4792, Santa Clara County Superior Court, Judge Peter H. Kirwan presiding (granted final approval of settlement on behalf of automotive factory workers involving claims for failure to pay overtime, failure to provide meal and rest periods, and other claims); *Nable v. TransFirst, LLC*, Case No. 8:15-cv-00891-DOC-JCG, U.S. District Court, Central District of California, District Judge

David O. Carter presiding (granted final approval of settlement of hybrid nationwide FLSA/California Rule 23 class action involving claims for failure to pay overtime, failure to provide meal periods, off-the-clock work, and other claims); *Kostyuk, et al v. Golden State Overnight Delivery Service, Inc*., Case No. RG14727191, Alameda County Superior Court, Honorable Winifred Y. Smith presiding (granted final approval of settlement on behalf of courier drivers involving claims for failure to provide meal periods, failure to pay wages, and other claims); *Leverage, et al v. Traeger Pellet Grills, LLC*, *et al*, Case No. 4: 16-cv-00784-KAW, U.S. District Court for the Northern District of California, Judge Kandis A. Westmore presiding (granted final approval of settlement on behalf of grill demonstrators involving claims for independent contractor misclassification, unpaid minimum wages, unpaid overtime, failure to provide meal periods, failure to authorize and permit rest periods, unlawful deductions from wages, and other claims); *Rendon v. AEP Industries, Inc*, Case No. CIVDS1621981, San Bernardino County Superior Court, Judge David S. Cohn presiding (granted final approval of settlement on behalf of non-exempt employees involving claims for unpaid wages and overtime wages, meal and rest periods, and other claims); *Orozco v. CashCall, Inc*., Case No. 30-2017-00902026-CU-OE-CXC, Orange County Superior Court, Judge Glenda Sanders presiding (granted final approval of settlement on behalf of non-exempt employees involving claims for unpaid wages and overtime wages, meal and rest periods, and other claims); *Barrios v. Providence Hospitality Partners, LLC,* Case No. 56-2016-00484750-CU-OT-VTA, Ventura County Superior Court, Judge Vincent J. O'Neill presiding (granted final approval of settlement on behalf of non-exempt employees involving claims for unpaid wages and overtime wages, meal and rest periods, and other claims); *Rojas v. Shultz Steel Company*, Case No. BC635967, Los Angeles County Superior Court, Judge Kenneth R. Freeman presiding (granted final approval of settlement on behalf of non-exempt employees involving claims for unpaid wages and overtime wages, meal and rest periods, and other claims); *Gooding v. Vita-Mix Corp., et al*, Case No. 2:16-cv-03898-ODW, U.S. District Court for the Central District of California, Judge Otis D. Wright presiding (granted final approval of settlement on behalf of blender demonstrators involving claims for independent contractor misclassification, unpaid wages, failure to provide meal and rest periods, and other claims); *Salas v. Alsco, Inc. dba Steiner Corporation, et al*, Case No. 34-2019-00266950-CU-OE-GDS, Sacramento County Superior Court, Judge Christopher E. Kreuger presiding (granted final approval of settlement on behalf of linen distribution employees involving claims for failure to pay wages, meal and rest period violations, and other claims).

7. I have also moved to certify and have received an order certifying a class action in multiple cases, including *Ontiveros v. Safelite Fulfillment, Inc.,* Case No. CV 15-7118-DMG (RAOx), U.S. District Court, Central District of California, Honorable Dolly M. Gee presiding (certifying six classes of employees for claims including rest period violations, wage statement violations, meal period violations, and overtime and double-time violations); *Caudle, et al. v. Sprint/United Management Company, et al.* Case No. C 17-06874-WHA, U.S. District Court, Northern District of California, Honorable William H. Alsup presiding (certifying three classes of employees for unlawful wage deduction violations, wage statement violations, and waiting time violations); and *Perez, et al v. Sunbelt Rentals*, Case No. 37-2018-00026405-CU-OE-CTL, San Diego County Superior Court, Hon. Eddie C. Sturgeon (certifying wage statement class).

8. In 2018, 2019, 2020, 2021, 2022, 2023, 2024, and 2025, Thomson Reuters recognized me as a "Rising Star" in Southern California in the area of employment law in the annual Super Lawyers magazine. This is an honor awarded to no more than two-and-a-half percent (2.5%) of attorneys under the age of forty in Southern California each year. In 2026, I was recognized by the same publication as a "Super Lawyer" in the field of employment litigation.

9. F. Shawn Azizollahi is a founding partner at Marquee Law Group. Mr. Azizollahi has gained extensive experience representing both companies and individuals in transactional and litigation matters, including employment matters, over the course of his career. For the last several years, Mr. Azizollahi's litigation practice has focused on representing plaintiffs in employment matters. Mr. Azizollahi has litigated and/or managed hundreds of employment cases, including a number of class actions. His active participation in this matter was integral in reaching the favorable settlement outcome on behalf of the Settlement Class.

10. Gary S. Brotman is a senior attorney at Marquee Law Group and has been the managing attorney for the firm's employment litigation department for the last nine (9) years.

During this time, he has played an active role in expanding the litigation department to over 250 active cases, including many class and PAGA actions. Mr. Brotman is a 2011 graduate of the Drexel University Thomas R. Kline School of Law and has been admitted to the California State Bar since 2012. In each year since 2018, Mr. Brotman has been recognized as a “Rising Star” in Southern California in the area of employment law in the annual Super Lawyers magazine. As noted, this is awarded to no more than 2.5% of attorneys under 40 each year.

11. Nancy Goodes is a 2022 graduate of the USC Gould School of Law and was admitted to the California State Bar in the same year. Before joining Marquee Law Group, Ms. Goodes worked as an associate for Lawyers for Justice, where she represented employees in California wage and hour class actions. Ms. Goodes has been with Marquee Law Group since July 2023, where she continues to work exclusively representing plaintiffs in employment matters, including wage and hour claims on both an individual and class action basis. During her tenure with Marquee Law Group, Ms. Goodes has worked on over 100 different California employment matters, including many class actions.

12. As counsel for Plaintiffs and the Settlement Class, I have been intimately involved in every aspect of this case since I joined Marquee Law Group in March 2024 through the present. Based on my extensive experience litigating similar wage and hour class actions, I believe the proposed Settlement is fair, reasonable and adequate for the Settlement Class.

13. The Parties in this case engaged in extensive informal discovery. In connection with mediation, Defendants produced a sampling of timekeeping and payroll records for putative class members during the Class Period; their wage and hour policies; the number of class members, workweeks, PAGA pay periods, and other data points; the applicable collective bargaining agreement; and other relevant information. My co-counsel at Wilshire Law Firm retained an expert data analyst to analyze and extrapolate the data produced by Defendants. This discovery allowed the Parties to assess the merits and value of Plaintiffs’ claims and Defendants’ defenses, as well as the chances for class certification.

14. The Parties attended a full-day mediation with Steve Cerveris, an experienced wage and hour class action mediator, on November 12, 2024, during which they vigorously

debated Plaintiffs' claims and Defendants' defenses, and the chances of certification. The Parties did not reach resolution at mediation. For more than two months the Parties continued their negotiations, which included my office and my co-counsel providing a supplemental brief to Mr. Cerveris regarding some of the issues where the Parties strongly disagreed. Eventually, Mr. Cerveris made a Mediator's Proposal, which was accepted by the Parties and ultimately resulted in the Settlement.

15. While Plaintiffs are confident in the merits of their claims, Plaintiffs acknowledge there were substantial risks and uncertainty in proceeding with class certification and eventual trial on the merits. Defendants presented multiple defenses to Plaintiffs' claims, both on the merits and to class certification, rendering success far from certain. The defenses asserted by Defendants, as well as the valuation of Plaintiffs' claims in light of those defenses, are explained in detail in the preliminary approval papers.

16. On or about September 4, 2025, this Court granted preliminary approval of the proposed Settlement. As described in the accompanying declaration from Phoenix Settlement Administrators, Class Notices were mailed to class members pursuant to the Settlement. There were a few class members who were left off the original class list, and pursuant to a stipulation of the parties that this Court approved in early January 2026, those additional class members were mailed their notices in January 2026 with an adjusted response deadline.

17. In my experience in wage and hour class actions similar to this one, fee awards generally average around one-third of the gross recovery.

18. My office incurred substantial attorney fees conducting extensive pre-filing investigation, analyzing potential claims, conducting legal research and analysis, engaging in extensive informal discovery, reviewing voluminous documents and data produced by Defendants, working with a retained expert data analyst to develop a comprehensive damages model, preparing for and attending a full-day mediation, drafting and providing supplemental briefing to the mediator after mediation, negotiating and preparing the long-form Settlement Agreement, preparing the Motion for Preliminary Approval and supporting documents,

overseeing the Notice process, fielding inquiries from Settlement Class members, assisting in drafting the Final Approval documents, and otherwise litigating the case.

19. Since undertaking representation of Plaintiff Rodriguez (and later the additional Plaintiffs), my office and my co-counsel have borne all the costs of litigation without receiving any compensation for two years of work. During this time, my office has expended approximately $2,207.08 in costs and has devoted substantial time to this litigation. Attached hereto as **Exhibit A** is a table summarizing the costs incurred by my firm in this case, all of which were reasonably incurred in the representation of Plaintiffs and the Settlement Class. My co-counsel's costs are delineated in my co-counsel's separate declaration, filed concurrently herewith.

20. My firm's experience in matters similar to this one was integral in evaluating the strengths and weaknesses of this case and the reasonableness of the Settlement. Practice in the narrow field of wage and hour litigation requires skill and knowledge concerning the rapidly evolving substantive law, as well as the procedural law of class action litigation. This case involved novel legal issues regarding both substantive and procedural law, including questions surrounding whether class members were entitled to overtime in light of the collective bargaining agreement, whether the arbitration agreement in the collective bargaining agreement would require arbitration of Plaintiffs' claims, Defendants' obligations to "provide" meal periods and "authorize and permit" rest periods, and the propriety of statutory penalties, to name just a few.

21. In this case, my firm has a current lodestar of approximately $217,374.50. Below is a summary reflecting hours of work performed by each attorney and paralegals in my firm on this case:

Name	Rate	Hours	Lodestar
Tuvia Korobkin (17th Year Attorney)	$925	135.2	$125,060.00
F. Shawn Azizollahi (17th Year Attorney)	$925	63.2	$58,460.00
Gary S. Brotman (14th Year Attorney)	$795	21.3	$16,933.50
Nancy Goodes (4th Year Attorney)	$495	19.8	$9,801.00
Paralegals	$200	35.6	$7,120.00
Total Lodestar		**275.1**	**$217,374.50**

22. My firm worked on a pure contingency fee basis on this case. The proposed hourly rates above are reasonable in light of my and my colleagues' experience in litigating similar matters. These hourly rates are also reasonable when viewed against the hourly rates in the current *Laffey* Matrix, which is attached hereto as **Exhibit B** (http://www.laffeymatrix.com/see.html), and which lists a reasonably hourly rate for an attorney with my, Mr. Azizollahi's, or Mr. Brotman's level of experience (11th-19th year of practice) as $1,019, lists a reasonable hourly rate for an attorney with Ms. Goodes' level of experience (4th-7th year of practice) as $625, and lists a reasonable hourly rate for paralegals at $277.

23. The *Laffey* Matrix has been recognized by California courts as "a widely recognized compilation of attorney rates based on various levels of experience" for the Washington D.C. metro area that can be adjusted for other locales around the country. (*Theme Promotions, Inc. v. News America Mktg. FSI, Inc.* (N.D. Cal. 2010) 731 F.Supp.2d 937, 948-49 (adjusting *Laffey* Matrix rates upward to account for higher cost of living in San Francisco area than in Washington, D.C. area, based on "federal locality pay differentials"); *see also Reed v. 1-800 Contacts, Inc.* No. 12-cv-02359 JM (BGS), 2014 WL 29011 at **8-9 (S.D. Cal. Jan. 2, 2014) (cross-checking requested hourly rates against the *Laffey* Matrix and finding that "the *Laffey* matrix lends…further credibility" to counsel's requested hourly rates); *Pasternack v. McCullough*, 65 Cal.App.5th 1050, 1057 fn. 5 (2021) ("The *Laffey* Matrix is a United States Department of Justice billing matrix that provides billing rates for attorneys at various experience levels in the Washington, D.C., area and can be adjusted to establish comparable billing rates in other areas using data from the United States Bureau of Labor Statistics"); *Syers Properties IIII, Inc. v. Rankin*, 226 Cal.App.4th 691, 700-702 (2014) (affirming trial court's reliance on locally adjusted *Laffey* Matrix rates).

24. The San Jose-San Francisco-Oakland area has a cost of living that is significantly higher than the Washington, D.C. Metro area, as reflected in the Office of Personnel Management ("OPM") Salary Tables attached hereto as **Exhibit C**. These tables are available at: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2026/general-schedule. These tables reflect that the "Locality Payment" percentage for the Washington, D.C. area is

33.94%, whereas the Locality Payment for the San Jose-San Francisco-Oakland area is substantially higher, at 46.34%.

25. According to the OPM website, "locality pay" is a "geographic-based percentage rate that reflects pay levels for non-Federal workers in certain geographic areas as determined by surveys conducted by the U.S. Bureau of Labor Statistics." (*See* https://www.opm.gov/policy-data-oversight/pay-leave/pay-systems/general-schedule/, last visited March 13, 2026). Locality pay is thus a reasonable gauge of the relative cost of living in different locales across the country.

26. Given that the locality pay for San Jose-San Francisco-Oakland is significantly higher than the locality pay for Washington, D.C., the rates in the *Laffey* Matrix would need to be adjusted significantly upwards to reflect the cost of living in this locale. (For example, the rate for an attorney with 11-19 years experience – applicable to Mr. Azizollahi, Mr. Brotman, and me – would be increased to approximately $1,113, and the rate for an attorney with 4-7 years of experience, such as Ms. Goodes, would be increased to approximately $683.) But even without making these upward adjustments, the rates requested herein are significantly below the rates in the *Laffey* Matrix for attorneys with similar levels of experience.

27. Moreover, the fact that my firm (with around 10 lawyers) is relatively small when compared to larger, national firms does not warrant a downward adjustment to my or my colleagues' hourly rates. As the Ninth Circuit recently recognized, "A firm's small size should not automatically result in its attorneys receiving a reduced hourly rate. A firm's size does not directly bear on the factors we must consider when awarding fees—the lawyers' skill, experience, and reputation. [Citation.] Indeed, some of the most skillful, experienced, and reputable attorneys strike out on their own or with several colleagues." *LA International Corp. v. Prestige Brands Holdings, Inc.*, --- F.4th ---, 2026 WL 504763 (9th Cir. Feb. 24, 2026).

28. The number of hours worked on this case is also reasonable. A total of 275.1 hours incurred by my firm since the *Rodriguez* matter was filed in December 2023, comes to an average of slightly over 2 hours per week expended by my firm on this case through the date of final approval in April 2026. The hours expended by my co-counsel come to a similar amount of hours worked per week when averaged over the life of this litigation. This reflects a significant amount

of time and resources devoted to this matter, from pre-litigation research to drafting the instant final approval papers. However, Class Counsel did not burden the Court with unnecessary motion work, *ex parte* applications, or discovery disputes. We instead litigated the case ably and efficiently, resulting in a very positive result for the Class.

29. Indeed, and as noted in the accompanying Motion, the Settlement represents an excellent result. Class members will receive over $1,500 on average, and <u>none</u> of the more than 1,100 class members has objected to any portion of the Settlement. Class Counsel deserve to be compensated for the strong result they achieved for the Class.

30. Plaintiffs seek incentive payments of $10,000 each. I believe this request is reasonable given Plaintiffs' efforts in this case and the risks they undertook on behalf of Settlement Class members. They were integral in the prosecution of this action, by among other things, gathering documents for use in this lawsuit, providing factual information to my firm and my co-counsel regarding their claims, and discussing the claims in this case, case strategy, and Statewide's wage and hour practices and policies with my office. Moreover, by their participation in this lawsuit, Plaintiffs exposed themselves to risk of retaliation by current and potential future employers who may learn of the lawsuit. In addition, this litigation has been pending for well over 2 years, and during this time Plaintiffs have not received any compensation from this litigation. If they had instead pursued their claims individually – rather than as a class action that benefits over 1,000 other employees – they may have received payment more quickly. In other words, Plaintiffs sacrificed the potential for a quick settlement for the benefit of more than 1,000 of their fellow class members. Such sacrifice deserves reward. Finally, the requested incentive payments, even *combined*, equate to less than 1% of the Gross Settlement Amount, and no Class member has objected to the incentive payments. For all of these reasons, I respectfully submit that the requested incentive payments of $10,000 each are reasonable for the named Plaintiffs.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on March 16, 2026 at Beverly Hills, California.

Tuvia Korobkin

EXHIBIT A

Costs Table – *Rodriguez et al v. Statewide Traffic et al*

Marquee Law Group, APC

Cost Category	**Amount**
Filing, Service, and Jury Fees	$2,152.57
Research/Document Retrieval Fees	$38.36
Postage	$16.15
Total	**$2,207.08**

EXHIBIT B

LAFFEY MATRIX

History

Case Law

See the Matrix

Contact us

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			Years Out of Law School *				
Year	Adjustmt Factor**	Paralegal/ Law Clerk	1-3	4-7	8-10	11-19	20 +
6/01/25- 5/31/26	1.075336	$277	$508	$625	$902	$1,019	$1,227
6/01/24- 5/31/25	1.080182	$258	$473	$581	$839	$948	$1,141
6/01/23- 5/31/24	1.059295	$239	$437	$538	$777	$878	$1,057
6/01/22- 5/31/23	1.085091	$225	$413	$508	$733	$829	$997
6/01/21- 5/31/22	1.006053	$208	$381	$468	$676	$764	$919
6/01/20- 5/31/21	1.015894	$206	$378	$465	$672	$759	$914
6/01/19- 5/31/20	1.0049	$203	$372	$458	$661	$747	$899
6/01/18- 5/31/19	1.0350	$202	$371	$455	$658	$742	$894
6/01/17- 5/31/18	1.0463	$196	$359	$440	$636	$717	$864
6/01/16- 5/31/17	1.0369	$187	$343	$421	$608	$685	$826
6/01/15- 5/31/16	1.0089	$180	$331	$406	$586	$661	$796
6/01/14- 5/31/15	1.0235	$179	$328	$402	$581	$655	$789
6/01/13- 5/31/14	1.0244	$175	$320	$393	$567	$640	$771
6/01/12- 5/31/13	1.0258	$170	$312	$383	$554	$625	$753
6/01/11- 5/31/12	1.0352	$166	$305	$374	$540	$609	$734
6/01/10- 5/31/11	1.0337	$161	$294	$361	$522	$589	$709
6/01/09- 5/31/10	1.0220	$155	$285	$349	$505	$569	$686
6/01/08- 5/31/09	1.0399	$152	$279	$342	$494	$557	$671
6/01/07-5/31/08	1.0516	$146	$268	$329	$475	$536	$645
6/01/06-5/31/07	1.0256	$139	$255	$313	$452	$509	$614
6/1/05-5/31/06	1.0427	$136	$249	$305	$441	$497	$598
6/1/04-5/31/05	1.0455	$130	$239	$293	$423	$476	$574
6/1/03-6/1/04	1.0507	$124	$228	$280	$405	$456	$549
6/1/02-5/31/03	1.0727	$118	$217	$267	$385	$434	$522
6/1/01-5/31/02	1.0407	$110	$203	$249	$359	$404	$487
6/1/00-5/31/01	1.0529	$106	$195	$239	$345	$388	$468
6/1/99-5/31/00	1.0491	$101	$185	$227	$328	$369	$444
6/1/98-5/31/99	1.0439	$96	$176	$216	$312	$352	$424
6/1/97-5/31/98	1.0419	$92	$169	$207	$299	$337	$406

6/1/96-5/31/97	1.0396	$88	$162	$198	$287	$323	$389
6/1/95-5/31/96	1.032	$85	$155	$191	$276	$311	$375
6/1/94-5/31/95	1.0237	$82	$151	$185	$267	$301	$363

The methodology of calculation and benchmarking for this Updated Laffey Matrix has been approved in a number of cases. See, e.g.,DL v. District of Columbia, 267 F.Supp.3d 55, 69 (D.D.C. 2017)

* ï¿½Years Out of Law Schoolï¿½ is calculated from June 1 of each year, when most law students graduate. ï¿½1-3" includes an attorney in his 1st, 2nd and 3rd years of practice, measured from date of graduation (June 1). ï¿½4-7" applies to attorneys in their 4th, 5th, 6th and 7th years of practice. An attorney who graduated in May 1996 would be in tier ï¿½1-3" from June 1, 1996 until May 31, 1999, would move into tier ï¿½4-7" on June 1, 1999, and tier ï¿½8-10" on June 1, 2003.

** The Adjustment Factor refers to the nation-wide Legal Services Component of the Consumer Price Index produced by the Bureau of Labor Statistics of the United States Department of Labor.

EXHIBIT C

Salary Table 2026-DCB

Incorporating the 1% General Schedule Increase and a Locality Payment of 33.94%

For the Locality Pay Area of Washington-Baltimore-Arlington, DC-MD-VA-WV-PA

Total Increase: 1%

Effective January 2026

Annual Rates by Grade and Step

Grade	Step 1	Step 2	Step 3	Step 4	Step 5	Step 6	Step 7	Step 8	Step 9	Step 10
1	$ 30,249	$ 31,263	$ 32,269	$ 33,271	$ 34,274	$ 34,862	$ 35,857	$ 36,859	$ 36,900	$ 37,835
2	34,011	34,820	35,948	36,900	37,313	38,410	39,507	40,604	41,701	42,798
3	37,112	38,350	39,587	40,825	42,063	43,300	44,538	45,775	47,013	48,251
4	41,659	43,048	44,437	45,826	47,215	48,604	49,993	51,382	52,771	54,160
5	46,610	48,163	49,717	51,271	52,825	54,378	55,932	57,486	59,039	60,593
6	51,957	53,689	55,420	57,152	58,884	60,616	62,348	64,080	65,811	67,543
7	57,736	59,661	61,586	63,510	65,435	67,360	69,284	71,209	73,134	75,059
8	63,940	66,071	68,202	70,333	72,464	74,595	76,726	78,857	80,988	83,119
9	70,623	72,977	75,332	77,687	80,041	82,396	84,751	87,105	89,460	91,815
10	77,771	80,363	82,954	85,546	88,138	90,730	93,321	95,913	98,505	101,097
11	85,447	88,296	91,145	93,994	96,843	99,692	102,540	105,389	108,238	111,087
12	102,415	105,829	109,243	112,657	116,071	119,485	122,899	126,313	129,728	133,142
13	121,785	125,845	129,904	133,964	138,024	142,084	146,143	150,203	154,263	158,322
14	143,913	148,711	153,509	158,306	163,104	167,902	172,700	177,497	182,295	187,093
15	169,279	174,922	180,565	186,207	191,850	197,200 *	197,200 *	197,200 *	197,200 *	197,200 *

* Rate limited to the rate for level IV of the Executive Schedule (5 U.S.C. 5304 (g)(1)).

Applicable locations are shown on the 2026 Locality Pay Area Definitions page:
https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2026/locality-pay-area-definitions/

Salary Table 2026-SF

Incorporating the 1% General Schedule Increase and a Locality Payment of 46.34%

For the Locality Pay Area of San Jose-San Francisco-Oakland, CA

Total Increase: 1%

Effective January 2026

Annual Rates by Grade and Step

Grade	Step 1	Step 2	Step 3	Step 4	Step 5	Step 6	Step 7	Step 8	Step 9	Step 10
1	$ 33,049	$ 34,157	$ 35,256	$ 36,351	$ 37,447	$ 38,089	$ 39,177	$ 40,271	$ 40,317	$ 41,338
2	37,160	38,044	39,276	40,317	40,767	41,966	43,164	44,363	45,561	46,760
3	40,548	41,900	43,252	44,604	45,957	47,309	48,661	50,013	51,365	52,718
4	45,516	47,034	48,551	50,069	51,586	53,104	54,621	56,139	57,656	59,174
5	50,925	52,622	54,320	56,017	57,715	59,413	61,110	62,808	64,505	66,203
6	56,767	58,659	60,551	62,443	64,335	66,228	68,120	70,012	71,904	73,796
7	63,081	65,184	67,287	69,390	71,493	73,596	75,699	77,802	79,905	82,007
8	69,860	72,188	74,516	76,845	79,173	81,501	83,829	86,158	88,486	90,814
9	77,161	79,733	82,306	84,879	87,451	90,024	92,597	95,169	97,742	100,315
10	84,971	87,803	90,634	93,466	96,298	99,129	101,961	104,793	107,624	110,456
11	93,358	96,470	99,583	102,696	105,808	108,921	112,034	115,146	118,259	121,371
12	111,896	115,626	119,356	123,087	126,817	130,547	134,277	138,007	141,738	145,468
13	133,060	137,495	141,931	146,366	150,802	155,237	159,673	164,109	168,544	172,980
14	157,236	162,478	167,720	172,962	178,204	183,446	188,688	193,930	197,200 *	197,200 *
15	184,950	191,116	197,200 *	197,200 *	197,200 *	197,200 *	197,200 *	197,200 *	197,200 *	197,200 *

* Rate limited to the rate for level IV of the Executive Schedule (5 U.S.C. 5304 (g)(1)).

Applicable locations are shown on the 2026 Locality Pay Area Definitions page:
https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2026/locality-pay-area-definitions/