**BURROWS LAW FIRM, APC**
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Attorneys for Plaintiffs
and the proposed Classes
JULIA GONZALES, ERIKA BRITO

**IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**IN AND FOR THE COUNTY OF SAN BERNARDINO**

JULIA GONZALES, ERIKA BRITO and JESUS RODRIGUEZ, on behalf of themselves and all others similarly situated,

Plaintiffs,

vs.

PMC SOUTHWEST LLC, a limited liability company; THE ARCTICOM GROUP, LLC, a limited liability company; THE ARCTICOM GROUP REFRIGERATION, LLC, a limited liability company and DOES 1 through 50, inclusive,

Defendants.

CASE NO. CIVSB2409006

**CLASS ACTION**

*[Assigned to the Hon. Winston Keh, Dept.: S37]*

**DECLARATION OF CHRISTOPHER L. BURROWS IN SUPPORT OF PLAINTIFFS' UNOPPOSED NOTICE OF MOTION AND MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT, ATTORNEYS' FEES AND COSTS, AND CLASS REPRESENTATIVE SERVICE AWARD**

Date: December 11, 2026
Time: 8:30 a.m.
Dept.: S37

**DECLARATION OF CHRISTOPHER L. BURROWS**

I, Christopher L. Burrows, declare as follows:

1. I am a fully qualified, adult resident of the State of California, and if called as a witness, I would testify truthfully to the matters set forth. All of the matters herein are within my personal knowledge, except those matters that are stated to be upon information and belief. As to such matters, I believe them to be true.

2. I am an attorney duly admitted to practice law before the courts in the State of California. I am Principal of Burrows Law Firm, APC, co-counsel with The Novak Law Firm PC, for Plaintiffs Julia Gonzales and Erika Brito ("Plaintiff Gonzales" and "Plaintiff Brito" respectively), in the instant case Julia Gonzales, Erika Brito and Jesus Rodriguez *v. PMC Southwest LLC et al.,* San Bernardino Superior Court, Case No. CIVSB2409006, with the original complaint filed on May 2, 2023, in Los Angeles County Superior Court, and, after consolidation with Plaintiff Jesus Rodriguez, the operative consolidated First Amended Complaint filed in San Bernardino County under the instant case number on or about April 12, 2026.

3. This Declaration is submitted in support of Plaintiffs' Motion for Final Approval of Class Action Settlement.

QUALIFICATIONS OF COUNSEL

4. I received my Juris Doctor from Howard University School of Law in 2002, where I was the Notes & Comments Editor of the Howard Law Journal. The summer after my first year of law school I served as the sole law school clerk for the Honorable J. Robert Brame, III, Member, National Labor Relations Board in Washington, D.C. The following summer I worked as a summer associate in the New York office of Kaye Scholer, LLP. I was employed as an associate in the Los Angeles office of Kaye Scholer, LLP, from 2002-2007. From 2007-2009, I worked as a senior associate in the Los Angeles office of Littler Mendelson PC. From August 2009 to January 2012, I held the position of Partner at the law firm of Mahoney & Burrows, LLP. From January 2012, to the present, I have served as Principal of the Burrows Law Firm, APC in Los Angeles, California.

EXPERIENCE AS COUNSEL IN CLASS/PAGA ACTIONS

5. To date, I have been appointed as Class and/or PAGA Counsel in the following matters which have been granted final approval, among others not listed here: *Oliver et al., v.*

*College Hospital, Inc. et al*., Los Angeles Superior Court, Case No. BC406481, the Honorable Carl J. West, Presiding, for work performed in 2009-2011; *Albiar et al. v. Spectrum Athletics et al*., Los Angeles County Superior Court, Case No. BC413860, for work performed in 2009-2011; *Wilcox v. Presbyterian Intercommunity Hospital, et al*., Los Angeles Superior Court, Case No. BC424796; Honorable Mary H. Strobel, Presiding, for work performed in 2009-2011; *Velasquez v. New Vista Health Services, Inc*., Los Angeles Superior Court, Case No. BC424797, for work performed in 2009-2011; *Branch v. The Plumbers Warehouse*, Los Angeles County Superior Court, Case No. BC425627, the Honorable Carl J. West, Presiding, for work performed in 2009-2012; *Teyuca v. Pacific Alliance Medical Center*, Los Angeles Superior Court, Case No. BC459422, for work performed in 2011-2014; *Harvey Holt v. Parsec Inc., et al*., United States District Court for the Central District of California, Case No. 2:10-CV-09540-VBF(PJWx), Hon. Valerie Baker Fairbank, Presiding, for work performed in 2010-2012; *Yamamoto v. The Ocean Group, Inc*., Los Angeles Superior Court, Case No. BC469970, for work performed in 2011-2013; *Santimateo v. Sun Healthcare Group, Inc.*, *et al*., Los Angeles Superior Court, Case No. BC471884 (consolidated with *Jones v. Sun Healthcare Group, Inc., et al*., Case No. BC476917), for work performed in 2011-2014; *Hilberger et al., v. Eisenhower Medical Center*, Riverside County Superior Court, Case No. INC1204915, for work performed in 2012-2014; *Myles et al., v. College Hospital, Inc., et al*., Los Angeles Superior Court, Case No. BC492125; (consolidated for limited purpose with BC487206 & BC498361), for work performed in 2012-2014; *Hugo Rodas v. Gateways Hospital and Mental Health Center, Inc., et al*., Los Angeles Superior Court, Case No. BC503179, for work performed in 2013-15; *Dull v. Episcopal Communities and Services for Seniors, et al*., Los Angeles Superior Court, Case No. BC512551, for work performed in 2013-15; *Bradescu et al., v. Hillstone Restaurant Group, Inc.*, United States District Court for the Central District of California, Case No. SACV 13-1289-GW(RZx) for work performed in 2013-16; *King v. Exodus Recovery, Inc., et al*., Los Angeles Superior Court, Case No. BC519640, for work performed in 2013-15; *Delgado v. Stars Behavioral Health Group, Inc., et al*., Los Angeles Superior Court, Case No. BC531008, for work performed in 2013-15; *Torres v. Fashion Furniture Rental, Inc., et al*., Los Angeles Superior Court, Case No. BC659190, for work performed in 2017-18; *Hernandez v. Molina Healthcare of California, et al*., Los Angeles Superior Court, Case No. BC679784, for work performed in 2017-19; *Rodolfo Sauceda*

*v. Building Materials Manufacturing Corp., et al*., Los Angeles Superior Court, Case No. BC686304, for work performed in 2017-19; *Shasta Williams v. Diamond Wipes International, Inc., et al*., Los Angeles Superior Court, Case No. BC673319, for work performed in 2017-19; *Lasha Cobbs v. Davlyn Investments, Inc*., Los Angeles Superior Court, Case No. BC675226, for work performed in 2017-2020; *Christie v. Trademango Solutions, LLC*, Los Angeles Superior Court, Case No. 18STCV07426, for work performed in 2018-2021; *Joshua Lane and Jeffrey Boller v. Vestas American Wind Technology, Inc., et al*., Kern County Superior Court Case No.: BCV-18-101494, for work performed in 2018-2021; *Antholine Fernandez v. Rx Transcription & Coding, LLC*, Los Angeles Superior Court, Case No. 18STCV06685, for work performed in 2018-2022; *Laura Ortiz et al., v. Casa Colina, Inc., et al*., Los Angeles Superior Court, Case No. BC682710, for work performed in 2017-2023; *Barkus and Reed v. Chancelight Behavioral Health, Inc*., Los Angeles Superior Court, Case No. 19STCV15592, for work performed in 2019-2023; *Kenneth Christie v. Avocado Green Brands, LLC*, Los Angeles Superior Court, Case No. 21STCV22426, for work performed in 2021-2024; *Silvia Solis aka Silvia Barrera and Lanet Scott v. AG Murrieta SNF, LLC*, Los Angeles Superior Court Case No. 23STCV24774, for work performed in 2023-2025; *Kriss Del Carpio v. Developlus, Inc.*, Riverside Superior Court, Case No. CVRI2305319, for work performed in 2023-2026; *Ayala-Guerrero v. Great Western Trailer, Inc*., San Bernardino Superior Court Case No. CIVSB2330429, for work performed in 2023-2026.

6. Since in or about 2002, I have, among representation of numerous clients in varied areas of law, represented corporate Defendants in Class Action litigation, including wage and hour class actions. In the 2002 Phenylpropanolamine (PPA) products liability litigation, I worked on a daily basis with the co-chair of the PPA joint defense team on experts and science issues, and helped defeat a multi-party action seeking refunds on millions of dollars of pharmaceutical product containing the chemical compound PPA that had been withdrawn from the market. As a member of the daily trial team in the four month jury trial at Los Angeles County's Central Civil West – Complex Courthouse, the Honorable Anthony J. Mohr, Presiding, I assisted in winning the first-in-the-nation PPA trial, *O'Neill, et al. v. Novartis Consumer Health, Inc*., JCCP-4166 (L.A. Super. Ct. Jan. 22, 2004), as well as defending the Plaintiff's unsuccessful appeal thereto. Both the Los Angeles Daily Journal and the National Law Journal selected this verdict as one of the "Top 10 Verdicts of

2004." This experience helped establish my diligence in the practice of law, generally, and my current management of class actions, specifically. While a significant portion of my practice at Kaye Scholer consisted of mass tort Pharmaceutical Products Liability, I also served as a key member of the employment law team that, from conception to settlement, successfully litigated wage and hour class actions. In addition to the aforementioned examples, at Kaye Scholer I had the opportunity to work on, and participate in the settlement of numerous class action and multi-party matters, both in state and federal court.

7. In 2007, in pursuit of specializing in employment law, I accepted a senior associate position at Littler Mendelson PC, a large defense-side labor and employment firm that represents a plethora of the world's leading corporations. While at Littler Mendelson, among other labor and employment litigation experience, I had the opportunity to serve as the most senior associate on numerous wage and hour class actions, in both state and Federal Court. I worked with experts, served as primary case contact to General Counsel, and actively participated in the highest-level analysis and decision making with regard to cases involving Fortune 500 companies and thousands of class members. I played an integral role in cases that, on the merits, were certified as class actions, as well as denied certification. I estimate that I was actively involved in more than ten wage and hour class actions in the two years while at the firm.

8. In July of 2009, I voluntarily resigned from Littler Mendelson and co-founded Mahoney, Perry & Burrows, in Long Beach, California. The firm (later re-named Mahoney & Burrows, LLP) served as lead counsel in no less than a dozen wage and hour class actions in Los Angeles Superior Court, San Diego Superior Court, Orange County Superior Court, and United States District Court for the Central District of California between 2009-2011. These cases involved a broad range of industries, including but not limited to, retail, healthcare, textiles, hospitality and manufacturing. I have personally served as lead counsel for wage and hour class actions that have been granted final approval in varying amounts ranging from approximately $140,000 to over $4,000,000.

9. In December 2011, Mahoney & Burrows, LLP dissolved, and I founded Burrows Law Firm, APC. Throughout my experience working at large international law firms on class actions generally, and wage and hour class actions specifically, I have gained the skill and

experience necessary to successfully litigate these cases. During my career, I have had the opportunity to work closely with and against some of the most accomplished Defense and Plaintiff-side wage and hour litigators in the State. In the twenty years I have been practicing employment law, I have both witnessed and personally experienced, the best practices of litigation in these cases. In addition to the above-referenced matters, Burrows Law Firm, APC handles general civil litigation matters, with a focus on counseling and litigation of employment issues.

10. From 2009 to the present (2026), on an annual basis, Thomson Reuters and Los Angeles Magazine have recognized me first, as a Top Young Attorney in Southern California in the annual Rising Star Edition of Super Lawyer, and then as a Southern California Super Lawyer, an honor awarded to no more than five percent (5%) of all attorneys in Southern California each year.

11. As counsel for Plaintiff and the proposed Settlement Class, I have been intimately involved in every aspect of this case from its inception through the present, and I believe that the proposed Settlement is a good result for the Settlement Class.

12. On May 2, 2023, Plaintiffs Gonzales and Brito filed a putative wage and hour class action in Los Angeles against Defendant alleging various wage and hour and Labor Code violations.

13. Plaintiff's theories of liability relate to allegations that Defendant failed to pay all overtime wages due to its failure to include non-discretionary compensation into the regular rate of pay for overtime purposes and/or off-the-clock work; failed to pay all earned wages due to an unlawful timekeeping/timeclock and/or rounding procedures; failed to provide all meal periods as required by law; failed to authorize and permit all rest periods as required by law; failed to pay reporting time pay as required; and, failed to reimburse employees for all necessary business related expenses. Based on these alleged violations, Plaintiff also brought derivative penalty claims for failure to furnish accurate and itemized wage statements, failure to pay all final wages owed upon separation of employment, and for civil penalties under the Labor Code Private Attorneys General Act ("PAGA").

14. The Settlement was reached after the parties engaged in formal discovery and mediation with an experienced wage and hour class action mediator. Prior to mediation, Defendant produced extensive discovery and information, including electronic payroll and timekeeping data for the class period, and documents reflecting its relevant wage and hour policies and practices in effect

during the relevant time period. After significant legal and factual research, including a detailed analysis of Defendant's potential exposure made with the assistance of Plaintiff's retained damages expert, a full-day mediation was held at which the Parties (with the assistance of a Mediator's Proposal) reached a class-wide resolution of Plaintiffs' claims. Over the course of the following months the parties negotiated the finer points of the settlement, ultimately resulting in the Settlement Agreement now before the Court. The parties ultimately finalized the terms of the settlement,

15. Class Counsel further submit that the requested fee of $310,380 (one-third of the Gross Settlement Amount of $931,340), split between the four (4) law firms representing Plaintiffs is fair and consistent with my firm's experience in similar wage and hour class action matters.

16. This case presented significant risks of both non-certification as well as potential challenges on the merits of Plaintiff's claims. It is fair and reasonable to account for these risks in compensating Class Counsel. Class Counsel should also be compensated for the risks involved in undertaking this litigation and expending considerable effort, all while working on a pure contingency basis. Since undertaking representation in this matter over three (3) years ago, Class Counsel advanced all the costs of litigation without receiving any compensation to date Class Counsel has incurred costs of $3,993.25 (Burrows Law Firm, APC) and $12,456.92 (The Novak Law Firm PC), for a total of $16,450.17, and devoted substantial time to this litigation. Class Counsel's request for reimbursement of $16,450.17 in actual litigation costs incurred is within the amount approved by the Court in the Settlement Agreement. Other Co-counsel will separately submit their costs. A true and correct copy of my firm's expense table is attached hereto as **Exhibit A**.

17. In accordance with the Amended Settlement Agreement, Plaintiffs also request that the Court approve $7,500 in administration costs to the Claims Administrator, CPT Group, Inc., as this expense is both fair and reasonable, and an amount preliminarily approved by the Court.

18. Plaintiffs each seek a service award of Ten Thousand Dollars ($10,000.00) and believe that this request is reasonable given his efforts in this case and the risks undertaken on behalf of Settlement Class Members. Among other things, Plaintiff provided substantial factual information and documents to Class Counsel, assisted Class Counsel by identifying potential witnesses, attended numerous in-person and telephonic meetings with Class Counsel to discuss the claims and theories at

issue in the litigation, and otherwise actively participated in the prosecution of this Action. Plaintiff invested significant time, effort and dedication into seeing this litigation through settlement, and, but for this commitment to pursue these claims, the Settlement Class would not have received any benefit.

19. Julia Gonzales and Erika Brito assumed responsibilities and risks beyond those of absent class members by agreeing to serve as named Plaintiffs. Their identities are publicly associated with this lawsuit against their employer, exposing them to potential reputational consequences and concerns regarding future employment opportunities.

20. Both Plaintiffs made substantial contributions to the development and resolution of this case. During my prefiling investigation, I devoted considerable time to discussing their employment experiences with them. The information they supplied helped form the factual basis for the PAGA notice and Complaint. As the litigation progressed, Ms. Gonzales and Ms. Brito assisted me in understanding the records obtained through informal discovery and evaluating those records in light of Defendant's workplace practices. Their continued participation also supported our mediation preparation and efforts to reach a settlement.

21. Before this action was filed, Ms. Gonzales and Ms. Brito complained to Defendant about workplace practices challenged here, including meal- and rest-period violations, reimbursements and experienced retaliation after raising those concerns. Although pursuing their potential retaliation claims individually could have provided a greater personal recovery, they chose to seek relief on behalf of the broader group of affected employees.

22. In my judgment, a service award of $10,000 to each Plaintiff appropriately recognizes her individual contribution to this result. My assessment takes into account the assistance each provided throughout the case, the time and effort each committed, the risks associated with serving as a named representative, and the claims each will release under the settlement.

23. Since my involvement in the instant litigation, which began prior to the filing of the Complaint on May 2, 2023, over three (3) years ago, I have personally spent in excess of Two hundred Five (205) attorney hours on this case. My duties and responsibilities have included, but were not limited to, multiple client interviews, pre-filing investigation, analyzing Plaintiff's claims, conducting legal research, general litigation, discovery, motion practice, communicating with class

members, responding to inquiries, attending Court appearances and hearings, supervision of staff, conferring with opposing counsel, reviewing documents and data produced by Defendant, retaining an expert to conduct a comprehensive analysis of employee timekeeping and other data, preparing for and attending mediation, negotiating and finalizing the long-form Settlement Agreement and modification thereto as directed by the Court and its orders, drafting the Motions for Preliminary and Final Approval along with associated exhibits, overseeing the Notice process and fielding calls from Settlement Class Members, and otherwise overseeing the litigation, including a plethora of other tasks summarized below:

**Pre-Litigation Investigation:**

- Interview potential plaintiff regarding facts of the case;
- Investigation of Defendant's corporate structure and relationship, facilities and recoverability;
- Analyze records and data with regard to potential claims;
- Extensive telephone communication with Plaintiff;
- Multiple meetings with Plaintiff.

**Post Filing Litigation, Discovery and Motion Practice:**

- Draft Complaint and LWDA PAGA letter;
- Meet with percipient witnesses;
- Draft correspondence;
- Legal and factual research re allegations in Complaint;
- Review extensive discovery, including meeting with Plaintiff and reviewing documents in Plaintiff's possession;
- Research regarding Defendant's workplace policies and allegations in Plaintiff's Complaint;
- Meetings w/ Plaintiff regarding information received and/or discovered as a result of prelitigation document requests;
- Draft, review, edit, revise various Stipulations, Motions, meet and confer correspondence, and other tasks required for the effective prosecution of the case.

**Mediation/Settlement:**

- Detailed analysis of documentation, information, and law for evaluation of liability and damages and other aspects of the case for mediation (and Class Certification, if necessary);
- Extensive consultation with damages expert on theories of liability;
- Review of informal discovery, documentation from Defendant in preparation for mediation;
- Review and analysis of documentation re liability and damages provided in preparation for mediation;
- Legal analysis and review for mediation brief;
- Prepare, edit and finalize mediation brief;
- Prepare for and attend all day mediation;
- Continued and ongoing negotiations with counsel for Defendant to ensure a fair settlement for the putative class members;
- Co-draft, edit, and revise Memorandum of Understanding;
- Co-draft, edit and revise Settlement Agreement and Exhibits thereto;
- Draft, edit and revise Motion for Preliminary Approval and accompanying papers;
- Prepare for hearing re Preliminary Approval of Settlement, meet and confer with Defense Counsel as necessary;
- Co-Draft, review and edit versions of the Class Notice and related documents;
- Telephonic conference calls with opposing counsel, e-mail correspondence regarding Claims Administration issues;
- Review and meet w/ client regarding settlement at various stages of administration; and,
- Review information and extensive correspondence with third-party administrator in furtherance of administering the claims and final approval of settlement.

24. The Settlement Agreement states, in pertinent part, that Defendant will not oppose requests for fees and costs provided they do not exceed 1/3 of the Gross Settlement Amount for fees and $40,000 total, for costs. The requested amounts for Class Counsel's fees (total $310,140 for all

Plaintiffs' Counsel) and costs ($16,450.17 total for Burrows Law Firm and the Novak Law Firm PC, combined), are both less than the amounts permitted per Settlement Agreement (attorneys' fees not to exceed one-third (1/3) of the Gross Settlement Amount and costs not to exceed Forty Thousand Dollars ($40,000 total)). Further, my proposed hourly rate of $800 per hour is reasonable in light of my 24 years of experience, skill level, reputation and fee awards to other attorneys of similar experience in California. My proposed rate is also consistent with rates for which I have been previously approved, as well as the *Laffey* Matrix, a true and correct copy of which is attached hereto as **Exhibit B**.

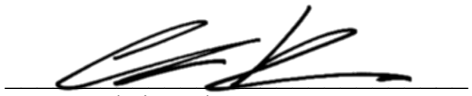
The number of hours of legal work performed by BURROWS LAW FIRM, specifically by me in this case, total no less than 205 for a conservative total Lodestar of $164,000.

Hours Summary

| Firm Name | Hours | Hourly Rate | Lodestar |
|---|---|---|---|
| BURROWS LAW FIRM | 205 | $800.00[1] | $164,000.00 |

25. The meaningful results from a monetary and non-monetary standpoint wholly support the requested attorneys' fee award.

I declare under penalty of perjury under the laws of California and the United States that the foregoing is true and correct. Executed on November 10, 2026, at Los Angeles, California



Christopher L. Burrows

[1] Christopher L. Burrows has previously received final approval at the rate of $750/hour for multiple years in San Bernardino, Los Angeles Superior Court and elsewhere.

# EXHIBIT A

***Cost Summary***

| EXPENSE | AMOUNT |
|---|---|
| Service of process fees, PAGA filing fee | $386.00 |
| expert analysis on regular rate claims | $3,150.00 |
| filings and service fees, dupication, messenger, postage | $342.35 |
| Courier fee | $115.00 ` |
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| **TOTAL EXPENSE** | $3,993.35 |

# EXHIBIT B

# LAFFEY MATRIX

History

Case Law

See the Matrix

Contact us

Home

| | | | 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.