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9
10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **FOR THE COUNTY OF SAN FRANCISCO**

12 ARMANI POWELL, individually, and on behalf
13 of all others similarly situated,

14 *Plaintiff,*

15 vs.

16 NORTHEASTERN UNIVERSITY, a corporation;
17 and DOES 1 through 10, inclusive,

18 *Defendants.*

Case No.: CGC-24-614228

Assigned for all purposes to:
Hon. Jeffrey S. Ross
Dept. 613

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

FINAL APPROVAL HEARING

Date: April 30, 2026
Time: 10:00 a.m.
Dept: 613

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”), counsel of record for plaintiff Armani Powell (“Plaintiff”). I have personal knowledge of the facts set forth in this declaration and could and would competently testify to them under oath if called as a witness.

2. I submit this declaration in support of Plaintiff’s Motion for Final Approval of Class Action and PAGA Settlement.

3. Plaintiff is represented by WLF. The attorneys at WLF performed significant work and expended litigation costs in prosecuting this matter with no guarantee of payment.

4. WLF was selected by Best Lawyers and U.S. News & World Report as one of the nation’s Best Law Firms since 2020 and is comprised of more than 100 attorneys and over 600 employees. WLF is actively and continuously practicing in employment litigation, representing employees in both individual and class actions in both state and federal courts throughout California.

5. WLF is qualified to handle this Litigation because its attorneys are experienced in litigating Labor Code violations in individual, class action, and representative action cases. WLF has handled, and is currently handling, numerous wage and hour class action lawsuits, as well as class actions involving consumer rights and data privacy litigation.

6. I graduated from the University of California, Santa Barbara with High Honors in 1991 with Bachelor of Arts degrees in Psychology. I received my Juris Doctor from UCLA Law School in 1996.

7. Upon graduating from law school in 1996, I worked for a boutique law firm practicing general litigation which included employment law matters. Since 2000 (that is, the last 26 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

1 of Morgan, Lewis & Bockius LLP (where I was a senior associate), Foley & Lardner LLP
2 (where I was a partner and a national Vice Chair of the Labor and Employment Group), Norton
3 Rose Fulbright LLP (where I was a partner) and Seyfarth Shaw LLP (where I was a partner and
4 member of the Wage and Hour Practice Group). During my time at these law firms, I was the
5 primary attorney or took a major leading role in defending employers on numerous wage and
6 hour class, collective and representative actions.

7 8. In late June 2022 I left Seyfarth Shaw LLP and joined my current firm, Wilshire
8 Law Firm, PLC, to represent plaintiff employees. I have been and am handling many wage and
9 hour class and representative actions litigating such matters on behalf of plaintiff employees in
10 numerous Superior Courts and District Courts. Across matters representing both plaintiffs and
11 defendants, I have successfully mediated the resolution of many wage and hour class,
12 collective, and representative actions. Since starting to settle cases in late April 2023 I have
13 already successfully mediated matters in which I have been counsel or co-counsel resulting in
14 **well over \$230 million** in settlements and verdicts that are in the process of being finalized,
15 and with numerous upcoming mediations scheduled. In these and numerous other matters, I
16 have managed and assisted with the litigation and settlement of many wage and hour PAGA
17 and class actions. In those actions, I performed similar tasks as those performed in the course
18 of prosecuting this action. Indeed, I recently tried and prevailed in achieving a jury verdict in
19 a certified wage and hour class action in the matter of *Aguilar-Flores v. Javier's – CC LLC*,
20 Los Angeles County Superior Court, 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
23 Reuters). I have also served on numerous prominent boards and in other leadership positions,
24 including serving as Southern California Regional President for the Hispanic National Bar
25 Association and on the board of directors of the Mexican American Bar Foundation. I also
26 previously served on the 5-member Los Angeles Civil Service Commission, which generally
27 oversees the personnel decisions for the City of Los Angeles.

1 10. I have also published numerous blogs on labor and employment issues including
2 on wage and hour issues. For example, I published “Headline News: Wal-Mart v. Dukes-
3 Impact on Class Action Litigation” (while a partner with Foley & Lardner LLP) and “Are You
4 Really Protected From Wage-and-Hour Successor Liability in an Asset Purchase” (while a
5 partner with Seyfarth Shaw LLP). I have also been a presenter at numerous conferences,
6 including being a presenter involving the “Employment Law Update” at a National
7 Employment Law Council conference. I currently bill at an hourly rate of \$1,500.00.

8 11. Arrash T. Fattahi graduated from the University of California, Los Angeles with
9 a Bachelor of Arts in Political Science, *summa cum laude*. He received his Juris Doctor from
10 The George Washington University Law School. During law school, he was a member of the
11 student editorial board for the Federal Circuit Bar Journal.

12 12. Mr. Fattahi’s practice is focused on advocating for the rights of consumers and
13 employees in class action litigation. He is currently the managing attorney in charge of
14 litigating several class action cases in state and federal courts in California.

15 13. As the attorney responsible for day-to-day management of this matter at the
16 Wilshire Law Firm, PLC, Mr. Fattahi has over five years of experience litigating wage and
17 hour class actions. Over the past five plus years, Mr. Fattahi has managed and assisted with
18 the litigation and settlement of several wage and hour class actions. In those class actions, he
19 performed similar tasks as those performed in the course of prosecuting this action.

20 14. Mr. Fattahi was selected as a “Southern California Rising Star” in 2025 and
21 2026.

22 15. Mr. Fattahi’s current contingent billing rate of \$850.00 per hour is consistent
23 with the legal market, accepted hourly rates, and his expertise and knowledge as it pertains to
24 wage and hour matters. Below is a non-exhaustive list of the cases where he has been appointed
25 as class counsel in his own right (as opposed to being part of a firmwide appointment of
26 counsel):

27 a. *Kingsbury v. Caravan Foods II, Inc.*, Alameda County Superior Court, Case No.
28

RG21096357; Motion for Final Approval granted on January 31, 2023.

- b. *Frias-Estrada v. Trek Retail Corporation*, Contra Costa County Superior Court, Case No. MSC20-01916; Motion for Final Approval granted on March 3, 2023.
- c. *Reyes v. Everytable, PBC, et al.*, Los Angeles County Superior Court, Case No. 21STCV35987; Motion for Final Approval granted on May 3, 2023.
- d. *Ortiz v. Tara Materials, Inc.*, San Diego County Superior Court, Case No. 37-2021-0001473-CU-OE-CTL; Motion for Final Approval granted on May 30, 2023.
- e. *Cruz-Sanchez v. Eagle Lath & Plaster, Inc.*, Sacramento County Superior Court, Case No. 34-2021-00293739-CU-OE-GDS; Motion for Final Approval granted on May 30, 2023.
- f. *Garduno v. New Generation Framing, Inc., et al.*, Stanislaus County Superior Court, Case No. CV-21-000544; Motion for Final Approval granted on August 11, 2023.
- g. *Hernandez, et al. v. Burford Farming Company, Inc.*, Fresno County Superior Court, Case No. 21CECG03817; Motion for Final Approval granted on August 21, 2023.
- h. *Barajas v. Final Phase Construction, Inc.*, San Bernardino County Superior Court, Case No. CIVSB2118622; Motion for Final Approval granted on September 13, 2023.
- i. *Jaimes, et al. v. Infiniti Health LLC*, Los Angeles County Superior Court, Case No. 22STCV07261; Motion for Final Approval granted on October 17, 2023.
- j. *Nunez v. Gabriel Container*, Los Angeles County Superior Court, Case No. 21STCV09787; Motion for Final Approval granted on November 2, 2023.
- k. *Lupercio v. Western CNC, Inc.*, San Diego County Superior Court, Case No. 37-2021-00010314-CU-OE-CTL; Motion for Final Approval granted on January 26, 2024.

- 1 l. *Jackson, et al. v. Apple Valley Communications, Inc., et al.*, San Bernardino
2 County Superior Court, Case No. CIVSB2124721; Motion for Final Approval
3 granted on February 1, 2024.
- 4 m. *Cuadras, et al. v. Guinn Corporation*, Kern County Superior Court, Case No.
5 BCV-21-101520; Motion for Final Approval granted on February 22, 2024.
- 6 n. *Williams v. Total Longterm Care, Inc., et al.*, San Bernardino County Superior
7 Court, Case No. CIVSB2213347; Motion for Final Approval granted on April
8 2, 2024.
- 9 o. *Meza v. Argus Management Company, LLC, et al.*, Los Angeles County
10 Superior Court, Case No. 21STCV31612; Motion for Final Approval granted on
11 May 20, 2024.
- 12 p. *Wade v. Mallory Safety and Supply LLC*, Siskiyou County Superior Court, Case
13 No. 23CV00951; Motion for Final Approval granted on July 11, 2024.
- 14 q. *Snell v. Shasta Community Health Center*, Shasta County Superior Court, Case
15 No. CVCV22-199416; Motion for Final Approval granted on November 12,
16 2024.
- 17 r. *Arce v. Sammy's Woodfired Pizza*, San Diego County Superior Court, Case No.
18 37-2023-00037670-CU-OE-CTL; Motion for Final Approval granted on
19 January 10, 2025.
- 20 s. *Ochoa, et al. v. La Tavola, LLC*, Napa County Superior Court, Case No.
21 22CV000862; Motion for Final Approval granted on January 23, 2025.
- 22 t. *Brown, et al. v. Fidelity Security Services, Inc.*, Los Angeles County Superior
23 Court, Case No. 21STCV31617; Motion for Final Approval granted on January
24 28, 2025.
- 25 u. *Torres v. Lupton Excavation, Inc.*, Sacramento County Superior Court, Case No.
26 34-2022-00317401-CU-OE-GDS; Motion for Final Approval granted on April
27 18, 2025.
- 28

- 1 v. *Peterson v. PJ Printers*, Orange County Superior Court, Case No. 30-2022-
2 01247546-CU-OE-CTL; Motion for Final Approval granted on April 25, 2025.
- 3 w. *Harris v. D&D Gear Incorporated dba Absolute Technologies, Inc.*, Orange
4 County Superior Court, Case No. 30-2021-01222330-CU-OE-CTL; Motion for
5 Final Approval granted on April 25, 2025.
- 6 x. *Guarista, et al. v. Urologic Institute of the High Desert, Inc.*, San Bernardino
7 County Superior Court, Case No. CIVSB2125029; Motion for Final Approval
8 granted on June 17, 2025.
- 9 y. *Carbajal v. Mattco Forge, Inc.*, Los Angeles County Superior Court, Case No.
10 23STCV12264; Motion for Final Approval granted on July 28, 2025.
- 11 z. *Martinez v. Corticare, Inc.*, San Diego County Superior Court, Case No. 37-
12 2023-00055906-CU-OE-CTL; Motion for Final Approval granted on November
13 21, 2025.

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

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

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1 18. WLF's hourly rates are comparable to those charged by other class action
2 plaintiffs' counsel and the firms defending class actions. WLF's rates are well within the range
3 of hourly rates that the Los Angeles legal marketplace would compensate counsel for similar
4 services accomplishing similar results. For example, in *Bronshteyn v. State of California*, Los
5 Angeles County Superior Ct. No. 19SMCV00057, Order Granting Plaintiff's Motion for
6 Statutory Attorneys' Fees and Costs filed March 30, 2023, an employment action brought by
7 two small law firms (Levy, Vinick, Burrell & Hyams LLP and Law Offices of Wendy Musell),
8 the court found that counsel's 2022 hourly rates of \$1,100 and \$1,000 per hour were reasonable
9 for the plaintiff's five senior attorneys, including \$1,000 per hour for the plaintiff's 23-year
10 lead counsel and \$850 per hour for a senior associate. These rates were then augmented by a
11 1.75 lodestar multiplier and affirmed by the California Court of Appeals. The rates
12 (and multiplier) requested here are well in line with those found reasonable
13 in *Bronshteyn*. In *Tran v. Golden State FC LLC, et al.* (LASC Case No. BC699931), Fee Order
14 filed 4/8/2022, the court found hourly rates of \$1,300 per hour reasonable for plaintiff's 32-
15 year attorney and \$1,000 per hour reasonable for a 14-year attorney. The multiplier here is even
16 more compelling given PAGA counsel represents approximately 220 PAGA Members.

17 19. WLF has been approved as Class Counsel by courts in California. *See, e.g.,*
18 *Matthew Veliz v. DrinkPak, LLC*, Los Angeles County Superior Court, Case No.
19 22STCV37384, *Ismael Villegas-Sanchez v. COE Orchard Equipment, Inc.*, Sutter County
20 Superior Court, Case No. CVCS22-0002261; *Jessica Bronsal v. PTI Technologies Inc.*,
21 Ventura County Superior Court, Case No. 202200570361CUOE; *Miguel A. Vigil Ruiz v. The*
22 *De Ruosi Group, LLC*, San Joaquin County Superior Court, Case No. STK-CV-UOE-2022-
23 8780; *Gutierrez v. Top Drawer Merch, LLC et al*, Los Angeles County Superior Court, Case
24 No. 23STCV04299; *Wing v. Road Machinery, LLC et al*, Kern County Superior Court, Case
25 No. BCV-22-102896; *Hernandez v. SGPS Showrig Los Angeles, Inc.*, Los Angeles County
26 Superior Court, Case No. 22STCV28155; *Azevedo v. Tulare Nursing & Rehabilitation*
27 *Hospital, Inc.*, Tulare County Superior Court, Case No. VCU293325; *Haser v. Universal Chain*
28

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

13 20. In cases in which WLF has been approved as Class Counsel, California courts
14 have approved rates similar to those requested by WLF in the instant case. See, e.g., *Rodolfo*
15 *Ponce v. Youbar, Inc.*, Los Angeles County Superior Court, Case No. 22STCV37519 (WLF's
16 rates were approved as follows: John G. Yslas (\$1,500.00), Samantha A. Smith (\$1,000.00),
17 Jeffrey C. Bils (\$850.00), Aram Boyadjian (\$600.00), Lisa B. Iturriaga (\$550.00), and Andrew
18 Sandoval (\$500.00)); *Sabrina N. Batres v. Wish Automotive II, Inc. dba Infiniti of Van Nuys*,
19 Los Angeles County Superior Court, Case No. 23STCV19968 (WLF's rates were approved as
20 follows: John G. Yslas (\$1,500.00), Jeffrey C. Bils (\$850.00), Aram Boyadjian (\$600.00), Lisa
21 B. Iturriaga (\$550.00), and Andrew Sandoval (\$500.00)); *Diandrea Correa et al. v.*
22 *CareMeridian, LLC, et. al.*, Los Angeles County Superior Court, Case No. 23STCV10707
23 (WLF's rates were approved as follows: John G. Yslas (\$1,500.00), Samantha A. Smith
24 (\$1,000.00), Jeffrey C. Bils (\$850.00), Fawn F. Bekam (\$800.00), Diego Aviles (\$800.00),
25 Aram Boyadjian (\$600.00), Harry Erganyan (\$600.00), Lisa B. Iturriaga (\$550.00), and
26 Andrew Sandoval (\$500.00)); *Carlos Santos Granados v. Sunny Hills Management Co., Inc.*,
27 Los Angeles County Superior Court, Case No. 23STCV02109 (WLF's rates were approved as
28

1 follows: John G. Yslas (\$1,500.00), Samantha A. Smith (\$1,000.00), Jeffrey C. Bils (\$850.00),
2 Diego Aviles (\$750.00), Courtney M. Miller (\$650.00), Aram Boyadjian (\$600.00), Harry
3 Erganyan (\$600.00), Mariam Nazaretyan (\$550.00), Lisa B. Iturriaga (\$550.00), and Andrew
4 Sandoval (\$500.00)); *Kayla Kurges v. Khanna Enterprises, Ltd. dba Sheraton Agoura Hills*,
5 Los Angeles County Superior Court, Case No. 24STCV01590 (WLF's rates were approved as
6 follows: John G. Yslas (\$1,500.00), Jeffrey C. Bils (\$850.00), Aram Boyadjian (\$600.00), Lisa
7 B. Iturriaga (\$550.00), and Andrew Sandoval (\$500.00)); *Thora Magney et al. v. Levi Strauss*
8 *& Co., et al.*, Los Angeles County Superior Court, Case No. 24STCV02320 (WLF's rates were
9 approved as follows: John G. Yslas (\$1,500.00), Samantha A. Smith (\$1,000.00), Jeffrey C.
10 Bils (\$850.00), Fawn F. Bekam (\$800.00), Aram Boyadjian (\$600.00), Lisa B. Iturriaga
11 (\$550.00), and Andrew Sandoval (\$500.00)); *Armando Muniz, et al. v. Lot LLC, dba Lot*
12 *Management LLC (fka Red Cow, Inc.) et. al.*, Los Angeles County Superior Court, Case No.
13 22STCV32901 (WLF's rates were approved as follows: John G. Yslas (\$1,500.00), Samantha
14 A. Smith (\$1,000.00), Jeffrey C. Bils (\$850.00), Diego Aviles (\$750.00), Aram Boyadjian
15 (\$600.00), Harry Erganyan (\$600.00), Mariam Nazaretyan (\$550.00), Lisa B. Iturriaga
16 (\$550.00), and Andrew Sandoval (\$500.00)); *George Munoz v. Century West, LLC dba Century*
17 *West BMW*, Los Angeles County Superior Court, Case No. 23STCV04247 (WLF's rates were
18 approved as follows: John G. Yslas (\$1,500.00), Samantha A. Smith (\$1,000.00), Jeffrey C.
19 Bils (\$850.00), Aram Boyadjian (\$600.00), Lisa B. Iturriaga (\$550.00), and Andrew Sandoval
20 (\$500.00)); *Ivan S. Martinez II et. al. v. The Haar Company, et. al.*, Los Angeles County
21 Superior Court, Case No. 23STCV21651 (WLF's rates were approved as follows: John G. Yslas
22 (\$1,500.00), Samantha A. Smith (\$1,000.00), Jeffrey C. Bils (\$850.00), Diego Aviles
23 (\$750.00), Aram Boyadjian (\$600.00), Harry Erganyan (\$600.00), Mariam Nazaretyan
24 (\$550.00), Lisa B. Iturriaga (\$550.00), and Andrew Sandoval (\$500.00)).

25 21. In support of the reasonableness of WLF's hourly rates, attached as **Exhibit 1** is
26 a true and correct excerpt from the *2025 Real Rate Report* published by Wolters Kluwer. The
27 Real Rate Report is widely relied upon in the legal industry because it is derived from
28

1 anonymized billing data taken from actual law firm invoices that were submitted to clients and
2 approved for payment, rather than from voluntary surveys or self-reported rates. Although the
3 report refers to “2025” rates, the data reflects rates charged by law firms during the first half
4 of 2024 and therefore represents the most recent available objective evidence of prevailing
5 market rates.

6 a. The report provides rate information filtered by geographic market, practice
7 type, and timekeeper role. Page 26 reports third-quartile rates for attorneys handling litigation
8 matters in San Francisco, which is one of the primary Northern California legal markets and
9 serves as the dominant rate-setting center for complex litigation throughout the region. In San
10 Francisco, the dataset shows third-quartile hourly rates of \$1,378 for litigation partners and
11 \$875 for associates. The report’s in-depth city analyses for San Francisco further confirms that
12 this market consistently reflects some of the highest billing rates in the country for experienced
13 litigators and serve as the benchmark markets for Northern California legal services.

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

25 c. The Real Rate Report does not provide 1st quartile or 4th quartile
26 rates, presumably to provide a sense of the average attorney billing rates. Importantly, the third
27 quartile represents the point below which 75% of rates fall; it is not a cap on reasonable rates.
28

1 By definition, a substantial portion of partners in the relevant benchmark market routinely bill
2 above that level, particularly those with extensive experience, specialized expertise, or
3 leadership roles in complex litigation. Courts evaluating fee requests recognize that leading
4 counsel in complex or representative actions may reasonably bill above median or third-
5 quartile benchmarks where their experience, results obtained, and responsibilities justify higher
6 rates. We firmly believe WLF belongs in the 4th quartile of attorney billing rates in Northern
7 California. As previously discussed, WLF is a nationally recognized employment litigation
8 firm that has been named one of the nation's *Best Law Firms* by U.S. News & World Report
9 and Best Lawyers since 2020, and its attorneys regularly litigate complex wage-and-hour class
10 and representative actions throughout California. I am a UCLA School of Law graduate with
11 nearly three decades of experience litigating labor and employment matters—including as a
12 partner and holding leadership roles at major international law firms when I was on the defense
13 side for 26 years, as well as substantial recent class and representative action results including
14 being one of the few attorneys in the state of California to try a wage and hour class action to
15 verdict (and prevail), and achieving results exceeding \$230 million in just the last three years
16 since starting to settle matters as a plaintiffs' attorney. My credentials and experience place my
17 \$1,500.00 hourly rate within the highest tier of Northern California employment litigators,
18 consistent with rates that would fall within the fourth quartile beyond those reported in the Real
19 Rate Report.

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

23 a. the investigation of the matter, including meeting with Plaintiff, reviewing
24 Defendant's policies, and requesting and reviewing Plaintiff's time and pay records, personnel
25 files, and exploring the corporate structure of Defendant;

26 b. filing the Action;

27 c. attending status conferences and meeting and conferring with Defendant
28

1 regarding the case;

2 d. drafting and filing an amended Action;

3 e. meeting and conferring with Defendant regarding mediation, exchange of
4 informal discovery beforehand, and negotiating with opposing counsel regarding the
5 parameters thereof;

6 f. selecting a mediator and mediation date;

7 g. working with opposing counsel, and expert consultants for the receipt of a
8 representative sampling and analyzing the same with the aid of expert consultants and Plaintiff
9 to perform analyses of liability and exposure prior to attendance of the mediation in this matter;

10 h. reviewing policy documents from Defendant and researching applicable
11 defenses;

12 i. preparation of the mediation brief and damages model for use at mediation;

13 j. attendance at the mediations by all Parties and Counsel;

14 k. communicating with Plaintiff who requested updates or other information
15 regarding this matter;

16 l. negotiating, finalizing and fully executing the settlement agreement;

17 m. preparing and filing the Motion for Preliminary Approval and supporting
18 documents;

19 n. coordinating with the settlement administrator and Defendant regarding Class
20 Notice, including but not limited to, correcting discrepancies in the Class Data;

21 o. attending a status conference to discuss issues related to the Class;

22 p. negotiating, finalizing and fully executing amendment to settlement agreement;

23 q. preparing and filing modified Motion for Preliminary Approval and supporting
24 documents;

25 r. coordinating with the settlement administrator to ensure additional notice to the
26 Class was completed, amongst other things; and

27 s. preparing the instant Motion for Final Approval and supporting documents.
28

23. WLF's current lodestar reflects the efficiencies achieved by attorneys experienced in this field with **311.1** hours of work resulting in **\$297,890.00** in fees. WLF 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 amount does not include the time Class Counsel will spend at the final approval hearing and assisting the Settlement Administrator following final approval. The chart below shows the calculation of hours spent by each of WLF's attorneys on this case:

Attorney	Hours	Hourly Rate	Total
Lisa B. Iturriaga	32.0	\$600.00	\$19,200.00
Arman A. Salehi	84.3	\$600.00	\$50,580.00
John G. Yslas	96.2	\$1,500.00	\$144,300.00
Arrash T. Fattahi	98.6	\$850.00	\$83,810.00
TOTAL	311.1		\$297,890.00

24. The risk factors present in this case favor the application of a 2.99 multiplier. To begin, Class Counsel has singularly assumed the risk and costs of litigation purely on a contingency basis. And, while Plaintiff is confident in the merits of her claims, a legitimate controversy exists as to each cause of action posing an actual risk that Plaintiff may not succeed at class certification and/or trial. Any of these obstacles could have prevented recovery completely, meaning Class Counsel would have been left with no compensation for all the time and money invested in litigating this case. Despite these risks, Class Counsel took this case on a contingency basis so that Class Members (a particularly vulnerable group of hourly paid workers) could be compensated for their unpaid wages. Consequently, Class Counsel was precluded from focusing on, or taking on, other cases which could have resulted in a larger, and less risky, monetary gain. This time could have been spent on other potentially lucrative cases.

25. In litigation costs, WLF has spent \$20,724.26 on items such as filing fees,

1 service fees, mediation fees, and expert fees. A true and correct copies of WLF's cost reports
2 in this matter are attached hereto as **Exhibit 2**. Additionally, we anticipate incurring \$300.00
3 in anticipated future costs for filing fees and service fees for a total of \$21,024.26 in costs.
4 Since Class Counsel's costs do not exceed the maximum of \$25,000.00, the remaining
5 \$3,975.74 will revert to the Net Settlement Amount. All of the costs incurred were reasonable
6 and necessary for the prosecution of this case.

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

9 27. To date, the LWDA has not responded to or objected to the Settlement in this
10 matter.

11 I declare under penalty of perjury under the laws of the State of California that the
12 foregoing is true and correct. Executed on March 30, 2026 at Los Angeles, California.

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15 John G. Yslas
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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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LEGAL CAVEAT

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NOTE:

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

Solution:

- Open the PDF in Acrobat and go to Edit > Preferences > Page Display.
- Uncheck Enhance thin lines (if it's checked).
- Restart Acrobat and reopen the PDF.

A Letter to Our Readers

Welcome to the latest edition of the Real Rate Report®, the legal industry's most trusted benchmark for legal billing rates.

Since 2010, the Real Rate Report has helped legal departments and law firms make smarter decisions about pricing, resourcing, and vendor management. That hasn't changed. What has changed is how we deliver those insights.

This year, the Real Rate Report is powered by LegalVIEW® DynamicInsights—our new digital-first platform that brings the same trusted LegalVIEW data to life in a more interactive, flexible, and timely way. Leveraging Wolters Kluwer's LegalVIEW database, with over \$200B in anonymized, approved, invoice data, LegalVIEW DynamicInsights offers dynamic filters, quarterly updates, and calendar-year alignment to help users tailor benchmarks to their unique needs, on demand.

The Real Rate Report remains a vital snapshot of the market, and we know many of you rely on it as a reference tool. But DynamicInsights goes further. It enables deeper exploration of rate trends by role, experience, geography, practice area, industry, and more. Whether you're negotiating rates, evaluating law firm performance, or planning budgets, DynamicInsights gives you the agility and precision today's legal environment demands.

As always, we welcome your feedback and thank our data contributors for making this work possible. We're proud to be your partner in legal analytics and look forward to continuing to deliver insights that drive better business outcomes.

Sincerely,



Brian Jorgenson

Vice President, Product Management
Wolters Kluwer ELM Solutions

Real Rate Report Overview

The Real Rate Report is powered by LegalVIEW DynamicInsights, a web-based solution that delivers dynamic, invoice-backed insights through approved legal billing rates. It enables legal professionals to analyze rate trends by role, experience, industry, geography, practice area, and more using the world's largest repository of legal spend data.

DynamicInsights leverages the same trusted LegalVIEW database that has powered the Real Rate Report for years, now encompassing over \$200B+ in anonymized, approved legal invoice data. As with previous Real Rate Reports, our data is sourced from corporations' and law firms' e-billing and time management solutions. We have included lawyer and paralegal rate data filtered by specific practice and sub-practice areas, metropolitan areas, and types of matters. This level of granularity gives legal departments and law firms the precision they need to identify areas of opportunity.

What's different with DynamicInsights?

Same source, same methodology: DynamicInsights uses the same rigorous data validation and methodology as the Real Rate Report.

- **Enhanced flexibility:** With dynamic filters, DynamicInsights enables users to tailor benchmarks to their unique needs and on demand.
- **Full year data:** DynamicInsights now aligns to a calendar year view—January through December—replacing the previous July-to-June format used in the Real Rate Report, reducing confusion and improving consistency across reporting periods.
- **More up to date:** Unlike the annual and static Real Rate Report, DynamicInsights is refreshed quarterly, offering more timely insights.
- **Digital-first access:** Delivered via a secure online interface, users can interact with the data, bookmark views, and share insights in real time.

DynamicInsights provides the same level of credibility and analytical power long trusted in the Real Rate Report with more agility and transparency for today's legal environment.

2025 Real Rate Report use considerations

- Examines law firm rates over time
- Identifies rates by location, experience, firm size, areas of expertise, industry, and timekeeper role (i.e., partner, associate, and paralegal)
- Itemizes variables that drive rates up or down

All the analyses included in DynamicInsights and this report are derived from the actual rates charged by law firm professionals as recorded on invoices submitted and approved for payment.

Examining real, approved rate information, along with the ranges of those rates and their changes over time, highlights the role these variables play in driving aggregate legal cost and income. The analyses can energize questions for both corporate clients and law firm principals.

Legal departments might ask whether they are paying the right amount for different types of legal services, while law firm principals might ask whether they are charging the right amount for legal services and whether to modify their pricing approach.

Examples of data to consider when reviewing rates:

- **Industry** – Compare spend and rate trends across various industries
- **Practice area** – Analyze cost variations in different legal practice areas
- **Detailed practice area** – Drill down into niche legal specialties for precise benchmarking
- **Am Law** – Benchmark against top-ranked law firms for competitive rate analysis
- **City** – Understand rate trends in specific metropolitan areas
- **Country** – Gain a global perspective on legal costs and spend management
- **Role** – Assess legal spend distribution across different law firm roles

Real Rate Report Overview

Understanding key statistical terms

To help interpret the legal rate data presented in DynamicInsights and this report, it's important to understand the statistical measures used. Below are definitions of the core metrics:

- **Mean (average):** The sum of all rate values divided by the total number of values added. It provides a general sense of the central tendency of the rates but can be influenced by extreme values (outliers).
- **Median:** The middle value when all rates are arranged in ascending order. If there is an even number of rates being analyzed, the median is the average of the two middle rates. It is a robust measure of central tendency of rates that is less affected by outliers.
- **First quartile (Q1):** The value below which 25% of the rates fall. It marks the lower boundary of the middle 50% of the rates and helps identify the lower range of typical values.
- **Third quartile (Q3):** The value below which 75% of the rates fall. It marks the upper boundary of the middle 50% of the rates and helps identify the upper range of typical values.
- **n:** The number of unique timekeepers contributing to the data.

These metrics are used to provide a more nuanced view of legal rates, helping users identify trends, outliers, and benchmarks across various dimensions.

See clearly. Spend wisely.

Step into the future of legal spend management with responsibly developed AI-powered solutions.



Our innovative Total Spend Management approach leverages AI-powered capabilities to empower intelligent workflows and improved outcomes.



Up to 10% savings on legal spend



Up to 20% improvement in billing guideline compliance



Increased efficiencies free up time for more value-add work

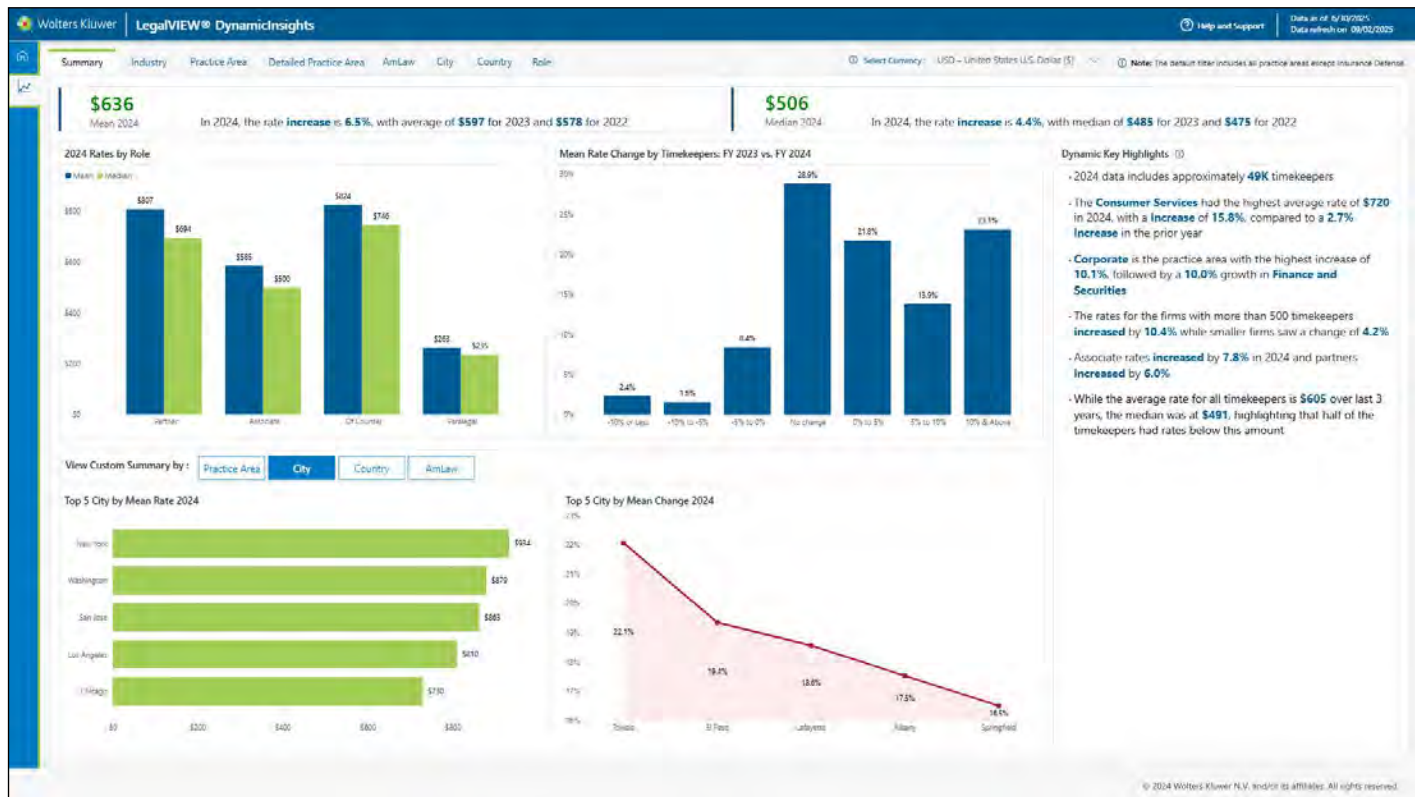
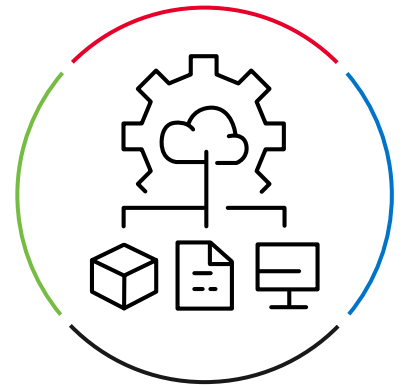


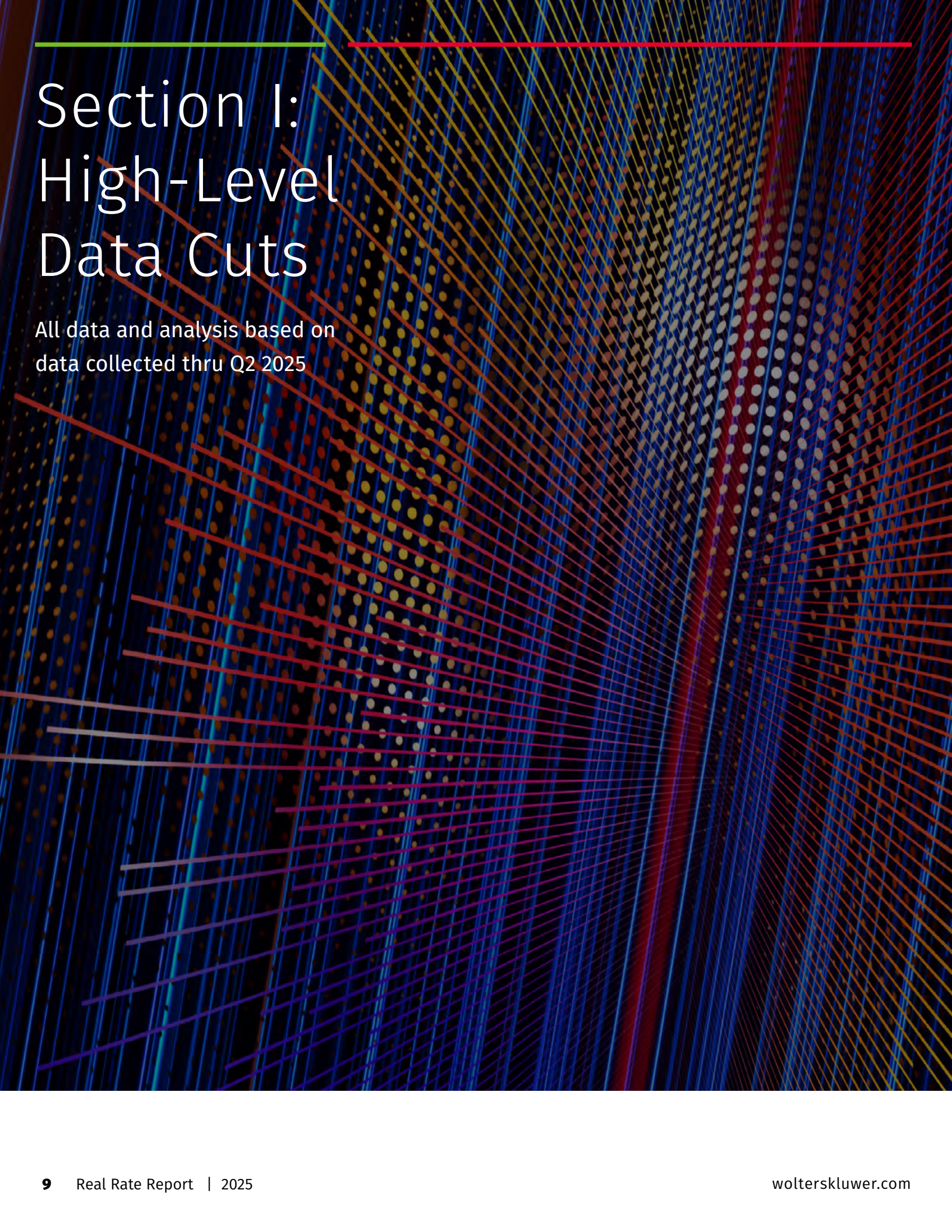
LegalVIEW® DynamicInsights

Legal rates keep climbing and 2026 will be no exception. Stay ahead with award-winning insights designed to give your team the edge in every negotiation.

Data that wins awards...and rate negotiations

- **Unmatched Data Power:** Leverages over **\$200B** in invoice-backed legal spend data to deliver deep, actionable insights.
- **Strategic Legal Spend Management:** Empowers legal teams to negotiate smarter, plan more effectively, and control costs with greater precision.
- **Enhanced Transparency & Collaboration:** Strengthens law firm-client relationships through data-driven transparency and benchmarking.
- **Insight-Driven Decision Making:** Enables analysis across key dimensions to support strategic negotiations and financial optimization.





Section I: High-Level Data Cuts

All data and analysis based on
data collected thru Q2 2025

Section I: High-Level Data Cuts

Cities

By 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

Wilshire Law Firm, PLC
Client Costs Detailed Report
All Transactions

03/23/26

Accrual Basis

Type	Date	Num	Class	Source Name	Memo	Amount	Balance
500000 - COS							
501500 - Court Filing Fees							
Credit C...	01/15/2025		NortheasternUniv(Powell).W&H	File & ServeXpress	202410100250501 NortheasternUniv(Powell).W&H	94.05	94.05
Credit C...	01/15/2025		NortheasternUniv(Powell).W&H	File & ServeXpress	202410100250501 NortheasternUniv(Powell).W&H	133.98	228.03
Bill	06/26/2024	78036	NortheasternUniv(Powell).W&H	Valpro Attorney Services, LLC	78036-NortheasternUniv(Powell).W&H-File POS	45.00	273.03
Bill	10/02/2024	82421	NortheasternUniv(Powell).W&H	Valpro Attorney Services, LLC	82421-NortheasternUniv(Powell).W&H-File Notice of Order	85.00	358.03
Bill	11/08/2024	83984	NortheasternUniv(Powell).W&H	Valpro Attorney Services, LLC	83984-NortheasternUniv(Powell).W&H-File Notice of Order	85.00	443.03
Credit C...	04/29/2024	22776500	NortheasternUniv(Powell).W&H	One Legal LLC	22776500-Comp,CCCS,Summ-Atty Svc for Court Filing-246097 Arm...	1,492.72	1,935.75
Credit C...	05/02/2024	22797384	NortheasternUniv(Powell).W&H	One Legal LLC	22797384-CCCS-Atty Svc for Court Filing-246097 Armani Powell vs ...	16.42	1,952.17
Credit C...	07/10/2024	23258652	NortheasternUniv(Powell).W&H	One Legal LLC	23258652-246097-Atty Svc for Court Filing-Appl for App Compl Lit D...	82.10	2,034.27
Bill	10/31/2024	202410100250501	NortheasternUniv(Powell).W&H	File & ServeXpress	202410100250501-NortheasternUniv(Powell).W&H-Joint Stip, CMS ...	0.00	2,034.27
Bill	10/31/2024	202410100250501	NortheasternUniv(Powell).W&H	File & ServeXpress	202410100250501-NortheasternUniv(Powell).W&H-Joint Stip for lea...	0.00	2,034.27
Bill	12/02/2024	202411100250501	NortheasternUniv(Powell).W&H	File & ServeXpress	202411100250501-NortheasternUniv(Powell).W&H-First Amended ...	103.78	2,138.05
Bill	06/02/2025	202505100250501	NortheasternUniv(Powell).W&H	File & ServeXpress	202505100250501-NortheasternUniv(Powell).W&H-Notice of Motion...	128.46	2,266.51
Bill	06/02/2025	202505100250501	NortheasternUniv(Powell).W&H	File & ServeXpress	202505100250501-NortheasternUniv(Powell).W&H-Notice of Errata ...	66.18	2,332.69
Total 501500 - Court Filing Fees						2,332.69	2,332.69
502500 - Legal Expenses							
Credit C...	06/21/2024		NortheasternUniv(Powell).W&H	Department of Industrial Relations	ORD-000296515 (246097) NortheasternUniv(Powell).W&H	75.00	75.00
Credit C...	06/24/2024		NortheasternUniv(Powell).W&H	Department of Industrial Relations	ORD-000296515 (246097) Northeastern University (Powell)	75.00	150.00
Bill	10/05/2023	849055448	NortheasternUniv(Powell).W&H	Thomson Reuters-West Publishi...	Legal Research-NortheasternUniv(Powell).W&H	37.68	187.68
Bill	05/06/2024	850124871	NortheasternUniv(Powell).W&H	Thomson Reuters-West Publishi...	Legal Research-NortheasternUniv(Powell).W&H	77.64	265.32
Total 502500 - Legal Expenses						265.32	265.32
502700 - Mediation Fees							
Bill	08/06/2024	PR39672	NortheasternUniv(Powell).W&H	Signature Resolution, LLC	PR39672-NortheasternUniv(Powell).W&H-50% Mediation Fee sked ...	10,495.00	10,495.00
Total 502700 - Mediation Fees						10,495.00	10,495.00
503200 - Process Service Fees							
Bill	06/25/2024	78005	NortheasternUniv(Powell).W&H	Valpro Attorney Services, LLC	78005-NortheasternUniv(Powell).W&H-Servee Northeastern Univer...	221.00	221.00
Total 503200 - Process Service Fees						221.00	221.00
503300 - Professional Fees							
Bill	03/20/2025	13770	NortheasternUniv(Powell).W&H	Berger Consulting Group, LLC	13770 NortheasternUniv(Powell).W&H 10.90hrs of work	7,085.00	7,085.00
Total 503300 - Professional Fees						7,085.00	7,085.00
Total 500000 - COS						20,399.01	20,399.01
TOTAL						20,399.01	20,399.01



WILSHIRE
LAW FIRM

Client Cost Report

Account	Type	Date	Num	Name	Matter Display Name	Line Memo	Amount
501500 Cost of Sale : Court Filing Fees	Bill	11/3/2025	202510100250501	File & ServeXpress	Northeastern University (Powell) - Wage & Hour (Class Action)	202509100250501-Madeling Davila-Joint Case Management Conference Statement	\$70.26
501500 Cost of Sale : Court Filing Fees	C r e d i t Card	12/8/2025	CC123125TA-1154	Los Angeles Superior Court	Northeastern University (Powell) - Wage & Hour (Class Action)	RM PA-2025-335429527 Declaration-246097-Armani Powell-9/14/2023	\$16.40
501500 Cost of Sale : Court Filing Fees	C r e d i t Card	12/8/2025	CC123125TA-1451	One Legal LLC	Northeastern University (Powell) - Wage & Hour (Class Action)	26944292-246097-Atty Svc for Court Filing-Declar,POS,Prop Ord-Armani Powell-9/14/2023	\$98.09
501500 Cost of Sale : Court Filing Fees	C r e d i t Card	12/8/2025	CC123125TA-1464	One Legal LLC	Northeastern University (Powell) - Wage & Hour (Class Action)	26944294-246097-Atty Svc for Court Filing-Declar,Prop Ord-Armani Powell-9/14/2023	\$92.67
501500 Cost of Sale : Court Filing Fees	C r e d i t Card	12/12/2025	CC123125TA-1595	One Legal LLC	Northeastern University (Powell) - Wage & Hour (Class Action)	26885276-246097-Atty Svc for Court Filing-Stip & Ord,POS-Armani Powell-9/14/2023	\$43.11
Total							\$320.53

Expenses Subtotals - Filtered Exp. Type

As of 2026-03-23 17:22:07 Pacific Standard Time/PST • Generated by Saul Solares

Filtered By
Show: All matters
Matter: ID equals a0LPc000000QfKT
Expense Type equals E127 — DTF,DTF,E108 — Postage,E102 — Printing

Display Name ↑	Expense Type ↑	Date	Expense: Expense ID	Provider Name	Note	Amount	Reduction Amount	Amount Paid	Amount Due.
Armani Powell - Wage & Hour: 9/14/2023	DTF	9/19/2023	E-3164888		DocuSign Envelope	\$1.89			\$1.89
	Subtotal	Sum				\$1.89	\$0.00	\$0.00	\$1.89
		Count	1						
	E108 — Postage	7/3/2024	E-3214401			\$2.83			\$2.83
	Subtotal	Sum				\$2.83	\$0.00	\$0.00	\$2.83
		Count	1						
Subtotal		Sum				\$4.72	\$0.00	\$0.00	\$4.72
		Count	2						
Total		Sum				\$4.72	\$0.00	\$0.00	\$4.72
		Count	2						