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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF CALAVERAS

ALLYSON FOOTE, JASON ROSS, and
COURTNEY JONES, individually, and on behalf
of all others similarly situated,

Plaintiffs,

v.

GOTTA LUV PIZZA, a California corporation;
GOTTA LUV PIZZA INC DBA ROUND TABLE
PIZZA #05, an unknown entity; and DOES 1
through 10, inclusive,

Defendants.

Case No.: 24CV47525

*[Assigned for All Purposes to the Hon. David
M. Sanders, Dept. 2]*

**DECLARATION OF TYLER J. WOODS
IN SUPPORT OF PLAINTIFFS'
NOTICE OF MOTION AND MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Final Approval Hearing:

Date: August 28, 2026

Time: 9:00 a.m.

Dept.: 2

Complaint filed: July 31, 2024

FAC filed: November 21, 2024

SAC filed: June 3, 2025

Trial date: Not set

DECLARATION OF TYLER J. WOODS

I, Tyler J. Woods, declare as follows:

1. I am an attorney at law licensed to practice before all of the courts of the State of California. I am a Senior Partner at Wilshire Law Firm, PLC (“WLF” or “Class Counsel”), counsel of record for Plaintiffs Allyson Foote, Jason Ross, and Courtney Jones (“collectively Plaintiffs”). I have personal knowledge of the facts set forth in this declaration and could and would competently testify to them under oath if called as a witness.

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

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

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

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

6. I graduated from the University of California, Davis in 1999 with a Bachelor of Arts degree in Communications with minors in Spanish and Psychology. I received my Juris Doctor from USC Gould School of Law in 2004.

7. Upon graduating from law school in 2004, I worked for international firm McDermott Will & Emery LLP practicing general litigation which included employment law matters. Since 2010, and exclusively since 2013, my practice has 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 at the law firms of

1 McDermott Will & Emery LLP (where he was a partner), Pacific Trial Attorneys (where he was a
2 partner), and labor and employment powerhouse Fisher Phillips (where he was a partner and head
3 of Fisher Phillips Class Action Practice Group). At these law firms, I was the lead trial counsel or
4 took a major leading role in defending employers on numerous wage and hour class, collective,
5 and representative actions. Under my leadership as lead counsel during my tenure as defense
6 counsel I successfully defeated class certification of a potential 10,000 plus class as lead counsel
7 on behalf of a nationwide quick service restaurant during my time as defense counsel and
8 negotiated several wage and hour class actions that were subsequently approved by the Courts.

9 8. In late March 2024, I left Fisher Phillips and joined WLF to represent plaintiff
10 employees. I have been and is handling many wage and hour class and representative actions
11 litigating such matters on behalf of plaintiff employees in numerous Superior Courts. From matters
12 representing both plaintiff and defendants, I have successfully mediated the resolution of many
13 wage and hour class, collective, and representative actions.

14 9. In July 2025, I obtained a jury verdict in excess of \$6,000,000 in a wage and hour
15 case in Los Angeles Superior Court against Javier's Cantina & Grill (Los Angeles Superior Court
16 Case No. 19STCV36438).

17 10. I have received numerous awards for his legal work. For example, from 2009-2011
18 and 2014, I was listed as a Rising Star in Los Angeles Super Lawyers (Thomas Reuters). I have
19 also served on numerous prominent boards and in other leadership positions, including currently
20 serving on the board of the Orange County Chapter of the California Restaurants Association.

21 11. I have also presented monthly webinars on labor and employment issues to hundreds
22 of participants since 2022, including on wage and hour issues. For example, I presented "10
23 Reasons Employers Get Sued (and How to Avoid These Mistakes" (while a partner with Fisher
24 Phillips) and "Key Insights for Hospitality Employers: Arbitration Agreements 101" (while a
25 partner with Fisher Phillips).

26 12. James Yoo is a Senior Attorney at WLF. He graduated from the University of
27 California, Los Angeles with a Bachelor of Arts in Philosophy and earned his Juris Doctor degree
28 from UCLA School of Law. He was admitted to practice law in the State of California in 2016.

1 Before joining WLF, he served as head of the Wage and Hour Department at Warmuth Law, where
2 he gained extensive experience managing wage and hour matters and negotiating settlements on
3 behalf of employees. As a Senior Attorney at WLF he leads and manages multiple complex wage
4 and hour class and representative actions under the California Private Attorneys General Act
5 (“PAGA”). He is currently overseeing more than one hundred active class action and PAGA
6 representative matters pending in courts throughout the State of California.

7 13. Giancarlo A. Recinos is a Senior Attorney at WLF. He was admitted to practice law
8 in the State of California in 2012 and is an active member in good standing with the State Bar of
9 California. Mr. Recinos graduated from San Francisco State University with a Bachelor of Arts in
10 Communications and received his Juris Doctor from Southwestern Law School. For over a decade,
11 his practice has focused on employment law and wage -and-hour compliance.

12 14. Courtney M. Miller is a Settlement Attorney at WLF. She was admitted to practice
13 law in the State of California in 2019. Ms. Miller graduated from the University of California,
14 Santa Cruz, with a Bachelor of Arts in Sociology. Prior to becoming an attorney, Ms. Miller worked
15 at a boutique civil litigation firm for nearly a decade, primarily handling employment matters. She
16 earned her Juris Doctor from Southwestern Law School in 2019. Ms. Miller has prosecuted wage
17 and hour class and PAGA actions, almost exclusively, since 2020. As a handling attorney, Ms.
18 Miller obtained over \$30 million dollars in settlements on behalf of California employees. Ms.
19 Miller currently bills at an hourly rate of \$700.00.

20 15. Ruby Carrera is an Associate Attorney at Wilshire Law Firm. She graduated from
21 the University of California, Davis with a Bachelor of Arts in Communications, and earned her
22 Juris Doctor from Santa Clara University School of Law in 2020. She was admitted to the
23 California State Bar in 2022. Ruby has represented clients in both state and federal courts in a wide
24 range of matters, including wrongful termination, workplace harassment, wage and hour disputes,
25 partition actions, and real estate litigation. Before joining Wilshire Law Firm, she focused her
26 practice on single-plaintiff employment cases, where she gained significant experience litigating
27 wage and hour claims and other employment-related disputes. She now focuses her practice on
28 wage-and-hour law, including Private Attorneys General Act of 2004 (“PAGA”) matters.

1 16. Justin F. Marquez is a former Senior Partner at WLF who was actively involved in
2 the litigation and resolution of this Action from its inception through December 2024. He
3 graduated from University of California, Los Angeles's College Honors Program in 2004 with
4 Bachelor of Arts degrees in History and Japanese, magna cum laude and Phi Beta Kappa. He
5 graduated from Notre Dame Law School with a Juris Doctorate. He was admitted to the State Bar
6 of California in February 2019. His practice focused primarily on advocating for the rights of
7 consumers and employees in class action litigation and appellate litigation. He received numerous
8 awards for his legal work: from 2017 to 2020, Super Lawyers selected him as a "Southern
9 California Rising Star," and from 2022 to 2025, he was selected as a "Southern California Super
10 Lawyer"; he was selected as one of the "Best Lawyers in America" from 2023 to 2025; and in
11 2024, he, along with his colleagues at WLF, received a CLAY (California Lawyer Attorneys of
12 the Year) award for their work on a false advertising case against Apple which ultimately led to a
13 \$25 million settlement. He also was selected to speak at multiple CELA conferences throughout
14 his career – in 2019, he spoke on the topic of manageability of class actions at CELA's 2019
15 Advanced Wage & Hour Seminar, and in 2024, he spoke on the topic of dealings with multiple
16 cases against the same defendant at CELA's 2024 Advanced Wage & Hour Seminar. He served
17 as lead or co-lead in negotiating class action settlements worth over \$10 million in gross recovery
18 to class members for each year since 2020, including over \$37.5 million in 2022 and over \$75
19 million in 2023.

20 17. Alan Wilcox is a former Senior Attorney at Wilshire Law Firm during the pendency
21 of the Action. He graduated from the University of California, Berkeley in 2007, and graduated
22 from Pepperdine University's School of Law and became a member of the California State Bar in
23 2012. Throughout his career, he has represented clients in both state and federal Courts in a wide
24 variety of matters, including contract disputes, wrongful foreclosure, unlawful detainer, divorce,
25 product defect, tort, and employment matters. From 2014 to the present, he has exclusively
26 practiced complex civil litigation representing plaintiff employees in employment matters. He has
27 handled both individual wrongful discharge and collective wage and hour actions, with the class
28 action and PAGA matters including *Flores v. Aqua Terra Culinary, Inc.*, Monterey Superior Court

1 Case No. 17CV002672, *Garcia v. Construction Innovations Group, LLC*, Sacramento Superior
2 Court Case No. 34-2020-00285239, *Kim v. Sheraton Operating Corp.*, Central District of
3 California Case No. 2:17-cv-09247-FMO-E, *Pease v. Wattrans, Inc.*, San Bernardino Superior
4 Court Case No. CIVDS1919832, and *Lachman v. Berlitz Languages, Inc.*, Los Angeles Superior
5 Court Case No. 19STCV01533, among others.

6 18. Arsine Grigoryan is a former Associate Attorney at WLF who was actively involved
7 in the litigation and resolution of this matter from its inception through December 2024. She earned
8 two Bachelor of Arts degrees from the University of California, Berkeley in (1) Political Science
9 with an emphasis on international relations and (2) Media Studies. She obtained her Juris Doctor
10 degree from Southwestern Law School. She is presently admitted to practice in all state courts of
11 California (admitted in 2017) and before all federal district courts in California. The focus of her
12 practice at WLF was on class action wage-and-hour law, including Private Attorneys General Act
13 of 2004 (“PAGA”) matters. Prior to joining WLF, she worked at a law firm specializing in wage-
14 and-hour class action cases. She handled more than a dozen active class action matters currently
15 pending and prosecuting multiple PAGA collective action matters in various courts throughout the
16 State of California.

17 19. Dorota A. James was an Associate Attorney at WLF. She earned her master’s degree
18 in law and business administration at the University of Wroclaw, where she received recognition
19 as an outstanding alumna. She also holds a J.S.D. degree in Comparative Law Studies and
20 a master’s degree in German law from the University of Saarland (Germany). She then went on to
21 get an LL.M. degree in Comparative Law at the University of San Diego Law School. She is
22 presently admitted to practice in all state courts of California (admitted in 2016) and before all
23 federal district courts in California. Prior to joining WLF in May 2024, Ms. James gained
24 invaluable litigation experience working at various Plaintiffs and defense firms,
25 including ShortLegal, APC, Tyson Mendes, LLP, and Dinsmore and Shohl, LLP. Ms. James’
26 practice was primarily focused on wage-and-hour class and representative action litigation brought
27 on behalf of employees. She also litigated discrimination and harassment cases as individual and
28 complex multi-party litigation.

20. WLF's hourly rates are comparable to those charged by other class action plaintiffs' counsel and the firms defending class actions. WLF's rates are well within the range of hourly rates that the Los Angeles legal marketplace would compensate counsel for similar services accomplishing similar results. For example, in *Bronshteyn v. State of California*, Los Angeles County Superior Ct. No. 19SMCV00057, Order Granting Plaintiff's Motion for Statutory Attorneys' Fees and Costs filed March 30, 2023, an employment action brought by two small law firms (Levy, Vinick, Burrell & Hyams LLP and Law Offices of Wendy Musell), the court found that counsel's 2022 hourly rates of \$1,100 and \$1,000 per hour were reasonable for the plaintiff's five senior attorneys, including \$1,000 per hour for the plaintiff's 23-year lead counsel and \$850 per hour for a senior associate. These rates were then augmented by a 1.75 lodestar multiplier and affirmed by the California Court of Appeals. The rates (and multiplier) requested here are well in line with those found reasonable in *Bronshteyn*. In *Tran v. Golden State FC LLC, et al.* (LASC Case No. BC699931), Fee Order filed 4/8/2022, the court found hourly rates of \$1,300 per hour reasonable for plaintiff's 32-year attorney and \$1,000 per hour reasonable for a 14-year attorney. The multiplier here is even more compelling given Class Counsel represents approximately 366 Class Members.

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

- a. The report provides rate information filtered by geographic market, practice type, and timekeeper role. Page 26 reports third-quartile rates for attorneys handling litigation matters in San Francisco and San Jose, which are the primary Northern California legal markets and serve as the dominant rate-setting centers for complex litigation throughout the region. In San Francisco, the dataset shows third-quartile

1 hourly rates of \$1,378 for litigation partners and \$875 for associates. In San Jose,
2 the report shows third-quartile hourly rates of \$1,250 for litigation partners and
3 \$1,030 for associates. The report's in-depth city analyses for San Francisco and San
4 Jose further confirm that these markets consistently reflect some of the highest
5 billing rates in the country for experienced litigators and serve as the benchmark
6 markets for Northern California legal services. Courts evaluating fee requests in
7 Calaveras routinely look to the prevailing rates in the nearest major metropolitan
8 markets as benchmarks when assessing reasonableness. The closest and most
9 relevant comparison markets for Calaveras litigation are San Francisco and San
10 Jose, where experienced partners routinely bill well above \$1,200 per hour based on
11 rates actually charged to clients.

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

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

26 c. the investigation of the matter, including meeting with Plaintiffs, reviewing
27 Defendant's policies, and requesting and reviewing Plaintiffs' time and pay records,
28 personnel file, and exploring the corporate structure of Defendant;

- d. filing the Action;
- e. attending status conferences and meeting and conferring with Defendant regarding the case;
- f. meeting and conferring with Defendant regarding mediation, exchange of informal discovery beforehand, and negotiating with opposing counsel regarding the parameters thereof;
- g. selecting a mediator and mediation date;
- h. working with opposing counsel for the receipt of a representative sampling and analyzing the same with the aid of an expert consultant and Plaintiffs to perform analyses of liability and exposure prior to attendance of the mediation in this matter;
- i. reviewing policy documents from Defendant and researching applicable defenses; preparing the mediation brief and damages model for use at mediation;
- j. attending the mediation;
- k. communicating with Plaintiffs;
- l. negotiating, finalizing and fully executing the settlement agreement;
- m. preparing and filing the Motion for Preliminary Approval and supporting documents;
- n. communicating with any Class Members who sought additional information regarding the settlement; and
- o. preparing the instant Motion for Final Approval and supporting documents.

23. WLF's current lodestar reflects the efficiencies achieved by attorneys experienced in this field with 186.2 hours of work resulting in **\$435,440.00** in fees. The chart below shows the calculation of hours spent by each of WLF's attorneys on this case:

Attorney	Hours	Hourly Rate	Total
Tyler J. Woods	25.5	\$1,200.00	\$30,600.00
Giancarlo Recinos	5.0	\$950.00	\$4,750
James Yoo	55.5	\$800.00	\$44,400.00

Courtney M. Miller	3.0	\$700.00	\$2,100.00
Ruby Carrera	45.0	\$550.00	\$24,750.00
Justin F. Marquez	10.0	\$1,000.00	\$10,000.00
Arsiné Grigoryan	15.0	\$800.00	\$12,000.00
Dorota James	20.0	\$750.00	\$15,000.00
Alan Wilcox	7.2	\$950.00	\$6,840.00
TOTAL	186.2		\$435,440.00

24. This amount surpasses the requested fee award of \$150,000.00 resulting in a negative multiplier. Class Counsel's lodestar does not include the time Class Counsel will spend at the Final Approval Hearing and assisting the Settlement Administrator following final approval. Class Counsel dedicated significant resources to this case by dividing the tasks required according to skill level. The hours expended by each attorney were not duplicative and reflect the extensive investigation and analysis that was required to achieve this Settlement. This time could have been spent on other potentially lucrative cases. Class Counsel's lodestar reflects the efficiencies achieved by attorneys experienced in this field. Moreover, Class Counsel has singularly assumed the risk and costs of litigation purely on a contingency basis. And, while Plaintiffs are confident in the merits of their claims, a legitimate controversy exists as to each cause of action, posing an actual risk that Plaintiffs 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.

25. In litigation costs, Wilshire Law Firm, PLC, has spent \$22,290.68 on items such as

1 filing fees, service fees, mediation fees, and expert fees. A true and correct copy of a breakdown
2 of costs incurred by my office is attached hereto as **Exhibit 2**. Additionally, we anticipate incurring
3 \$250.00 in future costs for filing fees and service fees for a total of \$22,540.68 in costs. Since Class
4 Counsel's Costs did not reach the maximum of \$26,000.00, the remaining \$3,709.32 will revert to
5 and increase the Net Settlement Amount. These costs were reasonable and necessary to prosecute
6 this case and obtain the results achieved.

7 26. Class Counsel has negotiated a settlement here that they believe is fair, reasonable,
8 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 matter.

10 I declare under penalty of perjury under the laws of the State of California that the foregoing
11 is true and correct.

12 Executed on August 4, 2026 at Los Angeles, California.

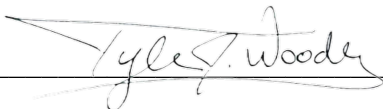
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15 Tyler J. Woods
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Exhibit 1



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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Table of Contents - 2025 Real Rate Report

A Letter to Our Readers • 4

Real Rate Report Overview • 5

Section I: High-Level Data Cuts • 9

- Partners, Associates, and Paralegals
- Partners, Associates, and Paralegals by Practice Area and Matter Type
- Partners and Associates by City
- Partners and Associates by City and Matter Type
- Partners by City and Years of Experience
- Associates by City and Years of Experience
- Partners and Associates by Firm Size and Matter Type

Section II: Industry Analysis • 71

- Partners, Associates, and Paralegals by Industry Group
- Partners and Associates by Industry Group and Matter Type
- Basic Materials and Utilities
- Consumer Goods
- Consumer Services
- Financials (Excluding Insurance)
- Health Care
- Industrials
- Insurance
- Technology and Telecommunications

Section III: Practice Area Analysis • 98

- Bankruptcy and Collections
- Commercial
- Corporate: Mergers, Acquisitions, and Divestitures
- Corporate: Other
- Corporate: Regulatory and Compliance
- Employment and Labor
- Environmental
- Finance and Securities
- General Liability (Litigation Only)
- Insurance Defense (Litigation Only)
- Intellectual Property: Other
- Intellectual Property: Patents
- Intellectual Property: Trademarks
- Real Estate

Section IV: In-Depth Analysis for Select US Cities • 201

- Boston, MA
- Chicago, IL
- Los Angeles, CA
- New York, NY
- Philadelphia, PA
- San Francisco, CA
- Washington, DC

Section V: International Analysis • 226

Section VI: Matter Staffing Analysis • 255

Appendix: Data Methodology • 259

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- 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.

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Up to 20% improvement in billing guideline compliance



Increased efficiencies free up time for more value-add work

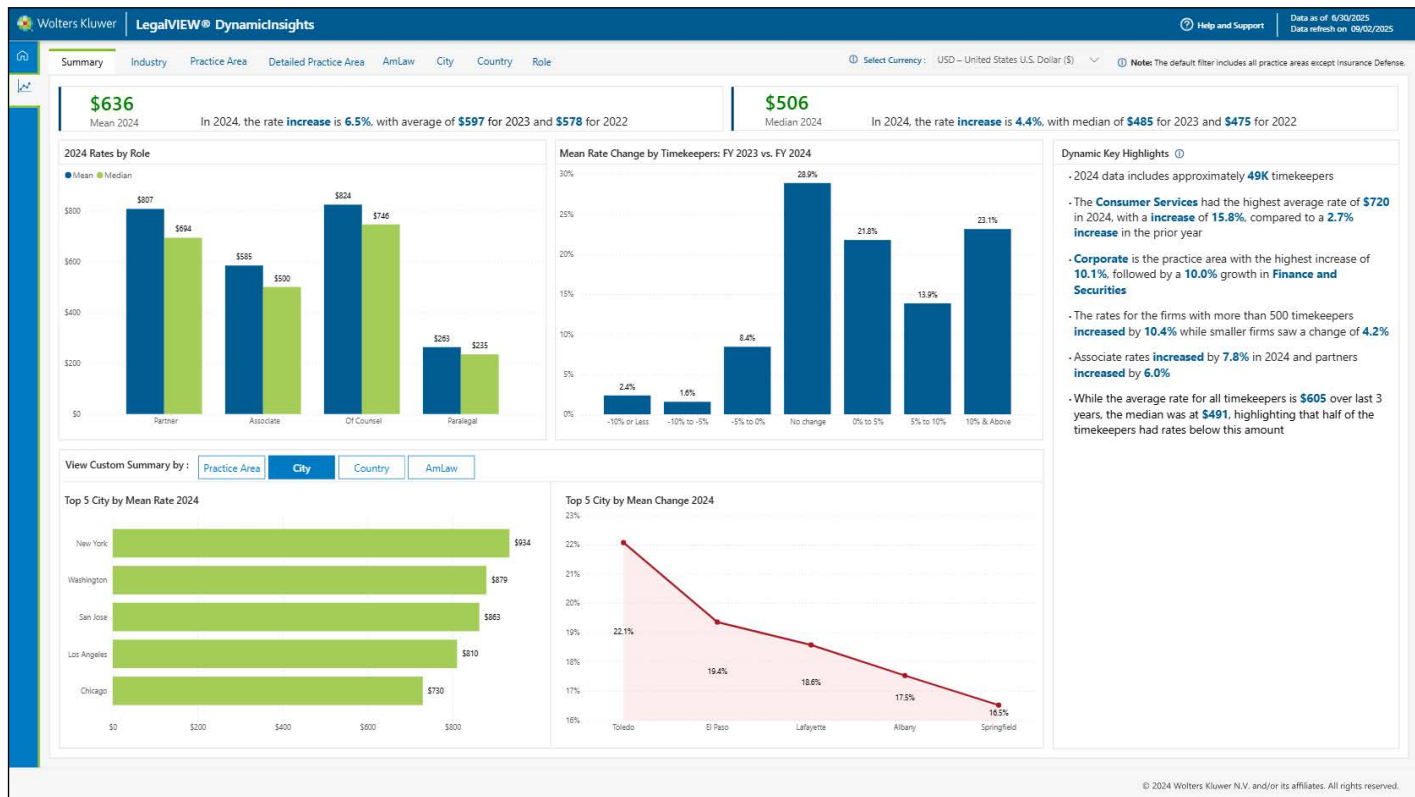
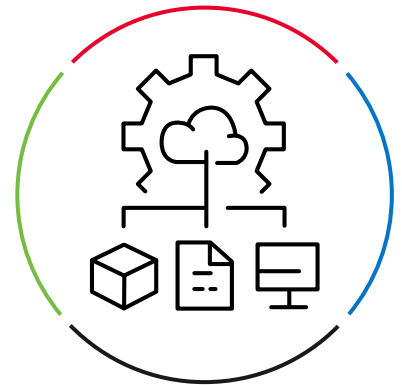


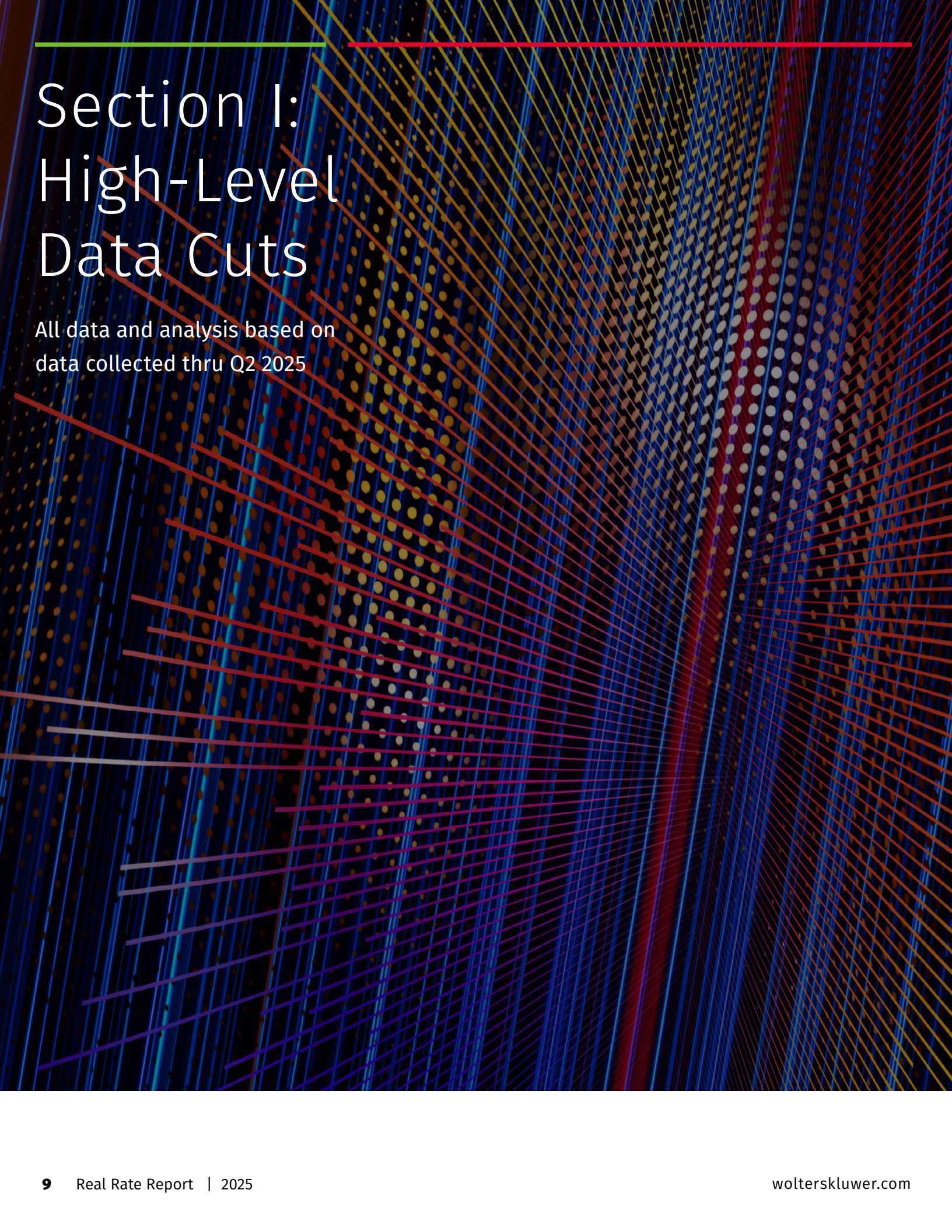
LegalVIEW® DynamicInsights

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

Data that wins awards...and rate negotiations

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





Section I: High-Level Data Cuts

All data and analysis based on
data collected thru Q2 2025

Section I: High-Level Data Cuts

Cities
By Role

2025 Real Rates for Associate and Partner

Trend Analysis - Mean

City	Role	n	First Quartile	Median	Third Quartile	2025	2024	2023
Los Angeles CA	Partner	565	\$517	\$925	\$1,365	\$993	\$979	\$913
	Associate	518	\$485	\$720	\$982	\$761	\$741	\$684
Louisville KY	Partner	32	\$291	\$395	\$500	\$411	\$395	\$380
	Associate	19	\$275	\$290	\$342	\$304	\$274	\$268
Madison WI	Partner	10	\$275	\$420	\$491	\$420	\$443	\$563
Memphis TN	Partner	22	\$325	\$394	\$470	\$404	\$428	\$387
Miami FL	Partner	191	\$250	\$525	\$733	\$547	\$570	\$575
	Associate	128	\$175	\$330	\$479	\$357	\$389	\$393
Milwaukee WI	Partner	32	\$364	\$459	\$649	\$524	\$581	\$525
	Associate	18	\$322	\$455	\$690	\$498	\$462	\$404
Minneapolis MN	Partner	138	\$475	\$694	\$918	\$692	\$673	\$637
	Associate	111	\$333	\$450	\$620	\$485	\$467	\$432

Section I: High-Level Data Cuts

Cities By Years of Experience

2025 Real Rates for Partner						Trend Analysis - Mean		
City	Years of Experience	n	First Quartile	Median	Third Quartile	2025	2024	2023
Phoenix AZ	21 or More Years	25	\$350	\$490	\$674	\$559	\$499	\$540
Pittsburgh PA	Fewer Than 21 Years	41	\$501	\$600	\$810	\$669	\$658	\$599
	21 or More Years	72	\$480	\$691	\$860	\$705	\$733	\$669
Portland ME	21 or More Years	18	\$386	\$435	\$484	\$418	\$421	\$381
Portland OR	Fewer Than 21 Years	17	\$402	\$465	\$525	\$599	\$536	\$509
	21 or More Years	32	\$470	\$525	\$639	\$594	\$607	\$553
Raleigh NC	21 or More Years	12	\$396	\$475	\$510	\$489	\$477	\$477
Richmond VA	Fewer Than 21 Years	10	\$604	\$703	\$855	\$707	\$746	\$687
	21 or More Years	24	\$431	\$713	\$1,084	\$739	\$756	\$726
Salt Lake City UT	Fewer Than 21 Years	12	\$395	\$447	\$459	\$422	\$445	\$412
	21 or More Years	16	\$350	\$463	\$521	\$480	\$433	\$407
San Diego CA	21 or More Years	33	\$438	\$785	\$1,334	\$894	\$898	\$882



Section II: Industry Analysis

All data and analysis based on
data collected thru Q2 2025

Section II: Industry Analysis

Consumer Services

By Detailed Practice Area and
Matter Type

2025 - Real Rates for Associate and Partner

Trend Analysis - Mean

Practice Area	Matter Type	Role	n	First Quartile	Median	Third Quartile	2025	2024	2023
Employment and Labor: Discrimination, Retaliation and Harassment / EEO	Litigation	Partner	27	\$393	\$495	\$613	\$509	\$463	\$436
		Associate	19	\$400	\$475	\$493	\$437	\$387	\$370
Employment and Labor: Other	Litigation	Partner	24	\$564	\$692	\$1,252	\$956	\$782	\$683
		Associate	14	\$384	\$469	\$564	\$553	\$484	\$458
	Non-Litigation	Partner	25	\$450	\$574	\$695	\$579	\$573	\$548
		Associate	25	\$397	\$450	\$525	\$465	\$472	\$456
Intellectual Property: Patents	Non-Litigation	Partner	41	\$350	\$595	\$691	\$605	\$652	\$634
		Associate	51	\$208	\$373	\$517	\$382	\$378	\$389
Real Estate: Leasing	Non-Litigation	Partner	17	\$410	\$539	\$865	\$616	\$664	\$667
		Associate	10	\$278	\$404	\$617	\$482	\$444	\$478
Real Estate: Other	Non-Litigation	Partner	58	\$480	\$626	\$940	\$694	\$612	\$540
		Associate	39	\$320	\$460	\$733	\$503	\$468	\$415

Exhibit 2

Wilshire Law Firm, PLC
Transaction Detail by Account
All Transactions

11/8/2024
Accrual Basis

<u>Type</u>	<u>Date</u>	<u>Num</u>	<u>Memo</u>	<u>Description</u>	<u>Amount</u>	<u>Balance</u>
COS						
Mediation Fees						
	05/05/2025	7646602	JAMS, Inc.	7646602-GottaLuvPizza(Foote).W&H-Mediation Fees	\$9,500.00	\$9,500.00
Total MEDIATION FEES					\$9,500.00	\$9,500.00
Consultant Fees						
	08/21/2025	13608	Berger Consulting Group LLC	13608-Gotta Luv Pizza (Foote)-16.80 of work	\$7,560.00	\$7,560.00
	09/04/2025	16195	Berger Consulting Group LLC	16195-Gotta Luv Pizza (Foote)-1.90 hours of work	\$855.00	\$8,415.00
Total CONSULTANT FEES					\$8,415.00	\$8,415.00
Filing Fees						
	08/02/2024	23434522	Filing Fee - One Legal LLC	Complaint	\$1,498.13	\$1,498.13
	08/08/2024	79885	Service Fee - Valpro Attorney Services, LLC	Serve Gotta Luv Pizza-S&C	\$91.00	\$1,589.13
	08/08/2024	79886	Service Fee - Valpro Attorney Services, LLC	Serve Gotta Luv Pizza Inc-S&C	\$166.00	\$1,755.13
	08/09/2024	79974	Filing Fee - Valpro Attorney Services, LLC	File x2 POS's	\$45.00	\$1,800.13
	11/19/2024	24162942	Filing Fee - One Legal LLC	Stip & Ord	\$42.54	\$1,842.67
	11/21/2024	24175170	Filing Fee - One Legal LLC	CMS	\$20.86	\$1,863.53
	11/25/2024	24190394	Filing Fee - One Legal LLC	Amended Compl	\$20.86	\$1,884.39
	12/02/2024		Remote Appearance - Court Call	Court Call	\$72.00	\$1,956.39
	04/01/2025	89763	Filing Fee - Valpro Attorney Services, LLC	File x2 POS's	\$45.00	\$2,001.39
	04/03/2025	25054480	Filing Fee - One Legal LLC	Petition,Sum,CCCS	\$1,505.54	\$3,506.93
	04/03/2025		Filing Fee - Department of Industrial Relations	PAGA Letter	\$75.00	\$3,581.93
	04/09/2025	25106877	Filing Fee - One Legal LLC	CMS	\$22.87	\$3,604.80
	04/10/2025	89678	Service Fee - Valpro Attorney Services, LLC	Serve: Gotta Luv Pizza, A C	\$90.00	\$3,694.80
	04/10/2025	89679	Service Fee - Valpro Attorney Services, LLC	Serve: Gotta Luv Pizza Inc.	\$225.00	\$3,919.80
	04/22/2025		Remote Appearance - Court Call	Court Call	\$72.00	\$3,991.80
	06/03/2025	25519166	Filing Fee - One Legal LLC	Stip & Ord	\$45.32	\$4,037.12
	06/04/2025	25525124	Filing Fee - One Legal LLC	Amended Comp	\$23.63	\$4,060.75
	06/05/2025	25530601	Filing Fee - One Legal LLC	Req. for Dismissal	\$23.63	\$4,084.38
	07/31/2025	CC083125TA-0909	Filing Fee - One Legal LLC	Change of Address	\$23.63	\$4,108.01
	01/13/2026	CC013126TA-0775	Filing Fee - One Legal LLC	Declaration	\$87.86	\$4,195.87
	03/06/2026	CC033126TA-0408	Filing Fee - One Legal LLC	Declaration	\$87.86	\$4,283.73
	04/23/2026	CC043026TA-2303	Filing Fee - One Legal LLC		\$24.73	\$4,308.46
	FUTURE		Filing Fee - One Legal LLC	MFA, Notice, and Compliance Dec.	\$250.00	\$4,558.46
Total FILING FEES					\$4,558.46	\$4,558.46
Other Costs						
	5/30/2024	E-3213683	Docusign Envelope		\$1.89	\$1.89
	7/1/2024	E-3213766	Postage		\$7.36	\$9.25
	7/1/2024	E-3213767	Postage		\$7.36	\$16.61
	7/1/2024	E-3213768	Postage		\$7.36	\$23.97
	8/22/2024	E-3236021	Docusign Envelope		\$1.89	\$25.86
	9/9/2024	E-3227275	Postage		\$8.16	\$34.02
	9/9/2024	E-3227274	Postage		\$8.16	\$42.18
	9/9/2024	E-3227273	Postage		\$8.16	\$50.34
	04/03/2025	E-3258289	Postage		\$8.44	\$58.78
	4/3/2025	E-3258286	Postage		\$8.44	\$67.22
Total OTHER COSTS					\$67.22	\$67.22
TOTAL					\$22,540.68	\$22,540.68