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

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

Plaintiff,

vs.

DC LOGISTICS, LLC, a Delaware limited
liability company; and DOES 1 through 50,
inclusive,

Defendants.

Case No.: 23CV049652

*[Assigned for All Purposes to the Honorable
Patrick McKinney, Dept. 18]*

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

Final Approval Hearing:

Date: August 26, 2026

Time: 1:30 p.m.

Dept.: 18

CRS# A-49652-003

Action Filed: November 2, 2023

DECLARATION OF JOHN G. YSLAS

I, John G. Yslas, declare as follows:

1. I am an attorney at law licensed to practice before all of the courts of the State of California. I am a Senior Partner at Wilshire Law Firm, PLC (“WLF” or “Class Counsel”), counsel of record for Plaintiffs Francisco Gongora, Luis Angel Diaz, and Juan Carlos Arteaga (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 and Marquee Law Group. The attorneys at WLF performed significant work and expended litigation costs in prosecuting this matter with no guarantee of payment.

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

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

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

7. Upon graduating from law school in 1996, I worked for a boutique law firm practicing general litigation which included employment law matters. Since 2000 (that is, the last 25 years) my practice has been exclusively focused on labor and employment matters including handling wage and hour class, collective and representative actions (including the California

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

8 8. In late June 2022 I left Seyfarth Shaw LLP and joined my current firm, Wilshire
9 Law Firm, PLC, to represent plaintiff employees. I have been and am handling many wage and
10 hour class and representative actions litigating such matters on behalf of plaintiff employees in
11 numerous Superior Courts and District Courts. From matters representing both plaintiffs and
12 defendants, I have successfully mediated the resolution of many wage and hour class, collective,
13 and representative actions. Just since starting to settle cases in late April 2023 I have already
14 successfully mediated matters in which I have been counsel or co-counsel resulting in **over \$280**
15 **million** in settlements and verdicts which are in the process of being finalized, and with numerous
16 upcoming mediations scheduled. In those and numerous other matters, I have managed and assisted
17 with the litigation and settlement of many wage and hour PAGA and class actions. In those actions,
18 I performed similar tasks as those performed in the course of prosecuting this action. Indeed, I
19 recently tried and prevailed in achieving a jury verdict in a certified wage and hour class action in
20 the matter of *Aguilar-Flores v. Javier’s – CC LLC*, Los Angeles County Superior Court, Case No.
21 19STCV36438 (settled after verdict).

22 9. I have received numerous awards for my legal work. For example, from 2015 to
23 2018, I was listed in Los Angeles Super Lawyers for Employment Litigation (Thomson Reuters).
24 I have also served on numerous prominent boards and in other leadership positions, including
25 serving as Southern California Regional President for the Hispanic National Bar Association and
26 on the board of directors of the Mexican American Bar Foundation. I also previously served on the
27 5-member Los Angeles Civil Service Commission, which generally oversees the personnel
28 decisions for the City of Los Angeles.

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

8 11. Jeffrey C. Bils is a Junior Partner at WLF. He graduated from the University of
9 Wisconsin–Madison with a Bachelor of Arts in Journalism and German, and received his Juris
10 Doctor from the University of California, Los Angeles School of Law in 2014. During law school,
11 he was a Senior Editor on the UCLA Law Review and an Articles Editor on the Entertainment
12 Law Review. Mr. Bils served as a Judicial Extern for the Hon. Consuelo Bland Marshall in United
13 States District Court for the Central District of California, and also for the Hon. Sandra R. Klein
14 of United States Bankruptcy Court for the Central District of California. Mr. Bils graduated
15 ranked No. 7 in his graduating class from UCLA School of Law. He was admitted to practice law
16 in the State of California in 2014. Since graduating from law school, he has focused his legal
17 work primarily on employment matters, including wage-and-hour class action and PAGA
18 representative action litigation, and he has helped obtain dozens of settlements on behalf
19 California workers, as well as on behalf of California employers during his years on the defense
20 bar. Mr. Bils is a member of the Beverly Hills Bar Association (BHBA), where he is a past
21 member of the Board of Governors and a past Chair of the Labor & Employment Law Section
22 Executive Committee. He is also a member of the California Employment Lawyers Association
23 (CELA) and the Consumer Attorneys Association of Los Angeles (CAALA). Mr. Bils’ hourly
24 billing rate is \$900.00.

25 12. Mohamed Bholat is a first-year Associate Attorney at Wilshire Law Firm, PLC.
26 He was admitted to practice law in the State of California in 2025. Mr. Bholat graduated from
27 University of California, Riverside with a Bachelor of Arts in Political Science. He received his
28 Juris Doctor from Southwestern Law School. Since graduating, his practice has been mainly

1 focused on wage and hour class action litigation. Mr. Bholat currently bills at an hourly rate of
2 \$500.00.

3 13. Aram Boyadjian was a fifth-year Associate Attorney at WLF. He was admitted to
4 practice law in the State of California in 2021. Mr. Boyadjian graduated from the University of
5 California, Los Angeles, with a Bachelor of Arts in Political Science. He received his Juris Doctor
6 from Loyola Law School. During law school, he was a member of the student editorial board for
7 the International and Comparative Law Review. Since January 2021, his practice has mainly been
8 focused on wage and hour class action litigation. Mr. Boyadjian billed at an hourly rate of
9 \$600.00.

10 14. Andrew Sandoval was a third-year Associate Attorney at WLF. He was admitted
11 to practice law in the State of California in 2022. Mr. Sandoval graduated from Azusa Pacific
12 University with a Bachelor of Arts in Economics. He received his Juris Doctor from Loyola Law
13 School. During law school, he was a Vice-President of La Raza de Loyola. Since graduating, his
14 practice has mainly been focused on wage and hour class action litigation. Mr. Sandoval billed at
15 an hourly rate of \$500.00.

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

24 16. Lucy H. Nguyen is a Settlement Attorney at WLF. She graduated from San
25 Francisco State University with a Bachelor of Science degree in Business Management and
26 earned her Juris Doctor from John F. Kennedy University, School of Law in 2011. Ms. Nguyen
27 was admitted to practice law in the State of California in 2021. Prior to joining WLF, Ms. Nguyen
28 practiced employment and family law litigation and handled a high-volume statewide docket

1 involving wage-and-hour disputes and complex litigation matters. Since joining WLF, Ms.
2 Nguyen has focused her practice on wage-and-hour class actions and representative actions under
3 the California Private Attorneys General Act (“PAGA”), including drafting and negotiating class
4 and PAGA settlements, approval motions, and related settlement documents. In this and other
5 matters, Ms. Nguyen has performed work including analyzing exposure, drafting settlement
6 agreements and approval papers, coordinating settlement administration issues, and assisting with
7 class and PAGA settlement approval proceedings. Ms. Nguyen currently bills at an hourly rate of
8 \$650.00.

9 17. WLF’s hourly rates are comparable to those charged by other class action plaintiffs’
10 counsel and the firms defending class actions. WLF’s rates are well within the range of hourly
11 rates that the Los Angeles legal marketplace would compensate counsel for similar services
12 accomplishing similar results. For example, in *Bronshteyn v. State of California*, Los Angeles
13 County Superior Ct. No. 19SMCV00057, Order Granting Plaintiff’s Motion for Statutory
14 Attorneys’ Fees and Costs filed March 30, 2023, an employment action brought by two small law
15 firms (Levy, Vinick, Burrell & Hyams LLP and Law Offices of Wendy Musell), the court found
16 that counsel’s 2022 hourly rates of \$1,100 and \$1,000 per hour were reasonable for the plaintiff’s
17 five senior attorneys, including \$1,000 per hour for the plaintiff’s 23-year lead counsel and \$850
18 per hour for a senior associate. These rates were then augmented by a 1.75 lodestar multiplier and
19 affirmed by the California Court of Appeals. The rates (and multiplier) requested here are well in
20 line with those found reasonable in *Bronshteyn*. In *Tran v. Golden State FC LLC, et al.* (LASC
21 Case No. BC699931), Fee Order filed 4/8/2022, the court found hourly rates of \$1,300 per hour
22 reasonable for plaintiff’s 32-year attorney and \$1,000 per hour reasonable for a 14-year attorney.
23 The reasonableness of the requested fee is even more compelling given that Class Counsel
24 represents approximately 453 Settlement Class Members and obtained a \$2,475,000.00 non-
25 reversionary settlement on their behalf.

26 18. WLF has been approved as class counsel by courts in California. *See, e.g., Matthew*
27 *Veliz v. DrinkPak, LLC*, Los Angeles County Superior Court, Case No. 22STCV37384, *Ismael*
28 *Villegas-Sanchez v. COE Orchard Equipment, Inc.*, Sutter County Superior Court, Case No.

CVCS22-0002261; *Jessica Bronsal v. PTI Technologies Inc.*, Ventura County Superior Court, Case No. 202200570361CUOE; *Miguel A. Vigil Ruiz v. The De Ruosi Group, LLC*, San Joaquin County Superior Court, Case No. STK-CV-UOE-2022-8780; *Gutierrez v. Top Drawer Merch, LLC et al*, Los Angeles County Superior Court, Case No. 23STCV04299; *Wing v. Road Machinery, LLC et al*, Kern County Superior Court, Case No. BCV-22-102896; *Hernandez v. SGPS Showrig Los Angeles, Inc.*, Los Angeles County Superior Court, Case No. 22STCV28155; *Azevedo v. Tulare Nursing & Rehabilitation Hospital, Inc.*, Tulare County Superior Court, Case No. VCU293325; *Haser v. Universal Chain of California, Inc.*, Sacramento County Superior Court, Case No. 34-2022-00332268; *Caldera v. Performance Online, Inc. et al*, Riverside County Superior Court, Case No. CVRI2306013; *Goosby v. CiminoCare, Inc.*, Sacramento County Superior Court, Case No. 34-2022-00329033; *Rooks v. Hot Cakes Restaurant Group, Inc.*, San Joaquin County Superior Court, Case No. STK-CV-UOE-2022-11056; *Garcia v. Compassionate Heart*, Orange County Superior Court, Case No. 30-2022-01294409-CU-OE-CXC; *Parra v. Citrus Valley Management Services, Inc.*, Riverside County Superior Court, Case No. CVRI2301768; *Torres v. HomeShield Pest Control Inc.*, Placer County Superior Court, Case No. S-CV-0049525; *Cabrera v. Creekside Auto Group*, Santa Clara County Superior Court, Case No. 23CV415661; *Simpson v. Arcos*, Riverside Superior Court, Case No. CVRI2303337; *Payne v. Planned Parenthood: Shasta-Diablo, Inc.*, San Francisco County Superior Court, Case No. CGC-23-607359. The total hours expended on this action are reasonable and in line with those expended in comparable cases.

19. In cases in which WLF has been approved as class counsel, California courts have approved rates similar to those requested by WLF in the instant case. *See, e.g., Rodolfo Ponce v. Youbar, Inc.*, Los Angeles County Superior Court, Case No. 22STCV37519 (WLF's rates were approved as follows: John G. Yslas (\$1,500.00), Samantha A. Smith (\$1,000.00), Jeffrey C. Bils (\$850.00), Aram Boyadjian (\$600.00), Lisa B. Iturriaga (\$550.00), and Andrew Sandoval (\$500.00)); *Sabrina N. Batres v. Wish Automotive II, Inc. dba Infiniti of Van Nuys*, Los Angeles County Superior Court, Case No. 23STCV19968 (WLF's rates were approved as follows: John G. Yslas (\$1,500.00), Jeffrey C. Bils (\$850.00), Aram Boyadjian (\$600.00), Lisa B. Iturriaga

1 (\$550.00), and Andrew Sandoval (\$500.00)); *Diandrea Correa et al. v. CareMeridian, LLC, et.*
2 *al.*, Los Angeles County Superior Court, Case No. 23STCV10707 (WLF's rates were approved as
3 follows: John G. Yslas (\$1,500.00), Samantha A. Smith (\$1,000.00), Jeffrey C. Bils (\$850.00),
4 Fawn F. Bekam (\$800.00), Diego Aviles (\$800.00), Aram Boyadjian (\$600.00), Harry Erganyan
5 (\$600.00), Lisa B. Iturriaga (\$550.00), and Andrew Sandoval (\$500.00)); *Carlos Santos Granados*
6 *v. Sunny Hills Management Co., Inc.*, Los Angeles County Superior Court, Case No.
7 23STCV02109 (WLF's rates were approved as follows: John G. Yslas (\$1,500.00), Samantha A.
8 Smith (\$1,000.00), Jeffrey C. Bils (\$850.00), Diego Aviles (\$750.00), Courtney M. Miller
9 (\$650.00), Aram Boyadjian (\$600.00), Harry Erganyan (\$600.00), Mariam Nazaretyan (\$550.00),
10 Lisa B. Iturriaga (\$550.00), and Andrew Sandoval (\$500.00)); *Kayla Kurges v. Khanna*
11 *Enterprises, Ltd. dba Sheraton Agoura Hills*, Los Angeles County Superior Court, Case No.
12 24STCV01590 (WLF's rates were approved as follows: John G. Yslas (\$1,500.00), Jeffrey C. Bils
13 (\$850.00), Aram Boyadjian (\$600.00), Lisa B. Iturriaga (\$550.00), and Andrew Sandoval
14 (\$500.00)); *Thora Magney et al. v. Levi Strauss & Co., et al.*, Los Angeles County Superior Court,
15 Case No. 24STCV02320 (WLF's rates were approved as follows: John G. Yslas (\$1,500.00),
16 Samantha A. Smith (\$1,000.00), Jeffrey C. Bils (\$850.00), Fawn F. Bekam (\$800.00), Aram
17 Boyadjian (\$600.00), Lisa B. Iturriaga (\$550.00), and Andrew Sandoval (\$500.00)); *Armando*
18 *Muniz, et al. v. Lot LLC, dba Lot Management LLC (fka Red Cow, Inc.) et. al.*, Los Angeles County
19 Superior Court, Case No. 22STCV32901 (WLF's rates were approved as follows: John G. Yslas
20 (\$1,500.00), Samantha A. Smith (\$1,000.00), Jeffrey C. Bils (\$850.00), Diego Aviles (\$750.00),
21 Aram Boyadjian (\$600.00), Harry Erganyan (\$600.00), Mariam Nazaretyan (\$550.00), Lisa B.
22 Iturriaga (\$550.00), and Andrew Sandoval (\$500.00)); *George Munoz v. Century West, LLC dba*
23 *Century West BMW*, Los Angeles County Superior Court, Case No. 23STCV04247 (WLF's rates
24 were approved as follows: John G. Yslas (\$1,500.00), Samantha A. Smith (\$1,000.00), Jeffrey C.
25 Bils (\$850.00), Aram Boyadjian (\$600.00), Lisa B. Iturriaga (\$550.00), and Andrew Sandoval
26 (\$500.00)); *Ivan S. Martinez II et. al. v. The Haar Company, et. al.*, Los Angeles County Superior
27 Court, Case No. 23STCV21651 (WLF's rates were approved as follows: John G. Yslas (\$1,500.00),
28 Samantha A. Smith (\$1,000.00), Jeffrey C. Bils (\$850.00), Diego Aviles (\$750.00), Aram

Boyadjian (\$600.00), Harry Erganyan (\$600.00), Mariam Nazaretyan (\$550.00), Lisa B. Iturriaga (\$550.00), and Andrew Sandoval (\$500.00)).

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

b. The 2025 Real Rate Report's practice-area-specific data further supports this conclusion. Page 81 provides third-quartile rates for the detailed practice category "Employment and Labor: Other Litigation," which is directly analogous to the type of work performed in this case. That dataset includes 24 partners and 14 associates and shows a third-quartile rate of \$1,252 per hour for partners and \$564 per hour for associates. These figures demonstrate that even within

1 the specialized employment litigation market, partners regularly bill well above \$1,200 per hour
2 based on rates actually charged to clients. When this practice-specific benchmark is considered
3 together with the broader regional market data, it confirms that WLF's hourly rate for highly
4 experienced counsel in a representative employment action falls within the upper range of
5 prevailing market rates rather than outside it.

6 c. The Real Rate Report does not provide 1st quartile or 4th quartile rates,
7 presumably to provide a sense of the average attorney billing rates. Importantly, the third quartile
8 represents the point below which 75% of rates fall; it is not a cap on reasonable rates. By definition,
9 a substantial portion of partners in the relevant benchmark market routinely bill above that level,
10 particularly those with extensive experience, specialized expertise, or leadership roles in complex
11 litigation. Courts evaluating fee requests recognize that leading counsel in complex or
12 representative actions may reasonably bill above median or third-quartile benchmarks where their
13 experience, results obtained, and responsibilities justify higher rates. We firmly believe WLF
14 belongs in the 4th quartile of attorney billing rates in Northern California. As previously discussed,
15 WLF is a nationally recognized employment litigation firm that has been named one of the nation's
16 *Best Law Firms* by U.S. News & World Report and Best Lawyers since 2020, and its attorneys
17 regularly litigate complex wage-and-hour class and representative actions throughout California. I
18 am a UCLA School of Law graduate with nearly three decades of experience litigating labor and
19 employment matters—including as a partner and holding leadership roles at major international
20 law firms when I was on the defense side for 26 years, as well as substantial recent class and
21 representative action results including being one of the few attorneys in the state of California to
22 try a wage and hour class action to verdict (and prevail), and achieving results exceeding **\$280**
23 **million** in just the last three years since starting to settle matters as a plaintiffs' attorney. My
24 credentials and experience place my \$1,500 hourly rate within the highest tier of Northern
25 California employment litigators, consistent with rates that would fall within the fourth quartile
26 beyond those reported in the Real Rate Report.

27 21. WLF has performed significant work and incurred litigation costs in prosecuting
28 this matter with no guarantee of any payment. The efforts expended by Class Counsel to achieve

1 this result include, but are not limited to, the following:

- 2 a. the investigation of the matter, including meeting with Plaintiff, reviewing
- 3 Defendant's policies, and requesting and reviewing Plaintiff's time and pay
- 4 records, personnel file, and exploring the corporate structure of Defendant;
- 5 b. filing the Action;
- 6 c. attending status conferences and meeting and conferring with Defendant
- 7 regarding the case;
- 8 d. meeting and conferring with Defendant regarding mediation, exchange of
- 9 informal discovery beforehand, and negotiating with opposing counsel
- 10 regarding the parameters thereof;
- 11 e. selecting a mediator and mediation date;
- 12 f. working with opposing counsel to obtain representative payroll and timekeeping
- 13 data and analyzing that information with the assistance of Berger Consulting,
- 14 Class Counsel's retained expert data analyst, and Plaintiffs to evaluate liability
- 15 and damages before mediation;
- 16 g. reviewing policy documents from Defendant and researching applicable
- 17 defenses;
- 18 h. preparing the mediation brief and damages model for use at mediation;
- 19 i. attending the mediation;
- 20 j. communicating with Plaintiff who requested updates or other information
- 21 regarding this matter;
- 22 k. negotiating, finalizing and fully executing the settlement agreement;
- 23 l. preparing and filing the Motion for Preliminary Approval and supporting
- 24 documents;
- 25 m. attending the hearing on Motion for Preliminary Approval;
- 26 n. communicating with any Class Members who sought additional information
- 27 regarding the settlement, including answering questions regarding the settlement
- 28 and obtaining updated addresses from Class Members for purposes of receiving

the Class Notice and administering the settlement checks; and

o. preparing the instant Motion for Final Approval and supporting documents.

22. To date, WLF has devoted 165.8 hours to prosecuting this action, resulting in a lodestar of \$170,720.00. The chart below summarizes the hours expended by WLF's attorneys in this matter:

Attorney	Hours	Hourly Rate	Total
John G. Yslas	66.5	\$1,500	\$99,750.00
Jeffrey C. Bills	36.1	\$900	\$32,490.00
Aram Boyadjian	38.3	\$600	\$22,980.00
Andrew Sandoval	5.9	\$500	\$2,950.00
Courtney M. Miller	4.0	\$700	\$2,800.00
Lucy H. Nguyen	15.0	\$650	\$9,750.00
TOTAL	165.8		\$170,720.00

23. When considered together with the lodestar reflected in the accompanying declaration of co-counsel Tuvia Korobkin, the combined lodestar of Class Counsel supports the requested attorney's fee award of \$866,250.00, representing a multiplier of approximately 2.61. Class Counsel's lodestar does not include the additional time that will be expended attending the Final Approval Hearing, overseeing implementation of the Settlement, responding to class member inquiries, and assisting the Settlement Administrator through completion of the settlement administration process. Class Counsel efficiently staffed this matter by assigning work according to each attorney's level of experience and expertise, avoiding unnecessary duplication of effort while achieving an excellent result for the Settlement Class. The hours expended reflect the substantial investigation, legal analysis, informal discovery, mediation preparation, settlement negotiations, and motion practice required to prosecute this action and obtain the Settlement. Throughout the litigation, Class Counsel assumed the substantial risk of nonpayment by

1 prosecuting this matter entirely on a contingency fee basis. Despite Class Counsel's confidence in
2 the merits of Plaintiffs' claims, significant litigation risks remained, including challenges to class
3 certification, disputed liability, and the possibility that Plaintiffs would recover nothing. Had
4 Plaintiffs not prevailed, Class Counsel would have received no compensation for the substantial
5 time and resources devoted to this litigation. In accepting those risks, Class Counsel necessarily
6 forewent other matters that could have provided more immediate or certain compensation. Under
7 these circumstances, the requested fee award is fair and reasonable.

8 24. To date, Wilshire Law Firm, PLC has incurred \$8,274.41 in recoverable litigation
9 costs, including court filing fees, service of process fees, court records and document retrieval
10 expenses, electronic filing and document service charges, and government filing fees. A true and
11 correct copy of a breakdown of the costs incurred by my office is attached hereto as **Exhibit 2.**
12 Together with the litigation costs incurred by co-counsel Marquee Law Group, Class Counsel
13 incurred total litigation costs of \$27,236.25. Because the combined litigation costs are less than the
14 maximum amount of \$30,000.00 authorized under the Settlement Agreement, the remaining
15 \$2,463.75 will remain in the Net Settlement Amount for distribution to participating Settlement
16 Class Members.

17 25. Based on Class Counsel's investigation, litigation experience, and evaluation of the
18 strengths and weaknesses of the claims and defenses, Class Counsel believes the Settlement is fair,
19 reasonable, adequate, and in the best interests of the Settlement Class.

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

23
24 Executed on August 4, 2026 at Los Angeles, California.

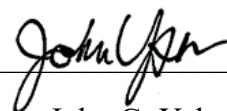
25
26 
27 John G. Yslas
28

EXHIBIT 1



ELM Solutions

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analysis of law firm rates,
trends, and practices

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NOTE:

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- Uncheck Enhance thin lines (if it's checked).
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A Letter to Our Readers

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

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

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

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

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

Sincerely,



Brian Jorgenson

Vice President, Product Management
Wolters Kluwer ELM Solutions

Real Rate Report Overview

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

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

What's different with DynamicInsights?

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

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

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

2025 Real Rate Report use considerations

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

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

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

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

Examples of data to consider when reviewing rates:

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

Real Rate Report Overview

Understanding key statistical terms

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

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

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

See clearly. Spend wisely.

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



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



Up to 10% savings on legal spend



Up to 20% improvement in billing guideline compliance



Increased efficiencies free up time for more value-add work

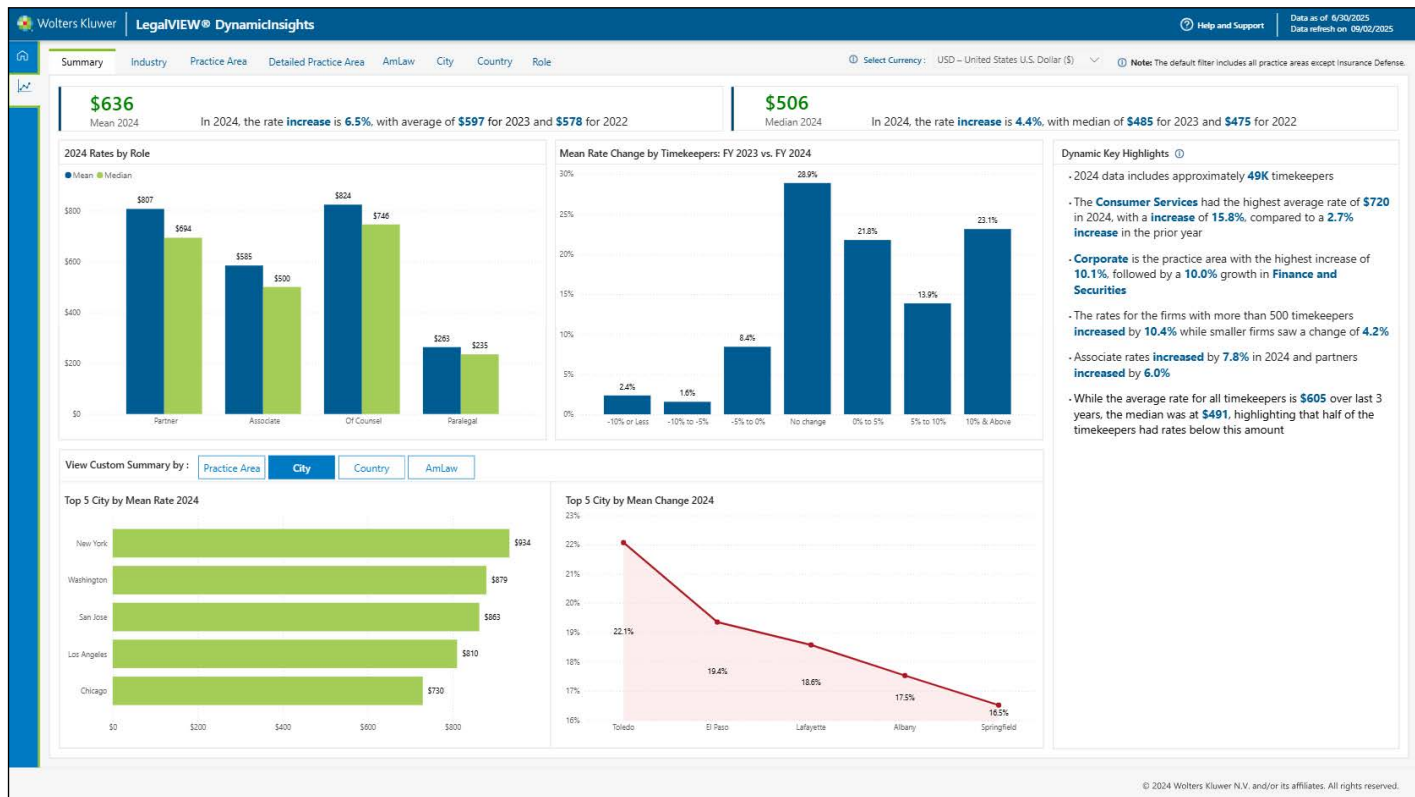
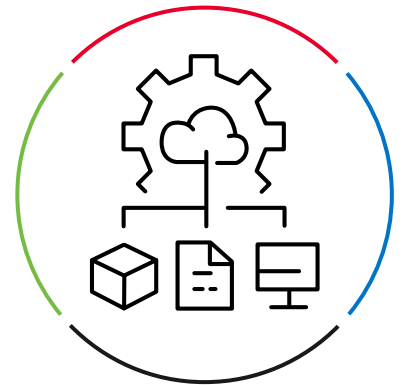


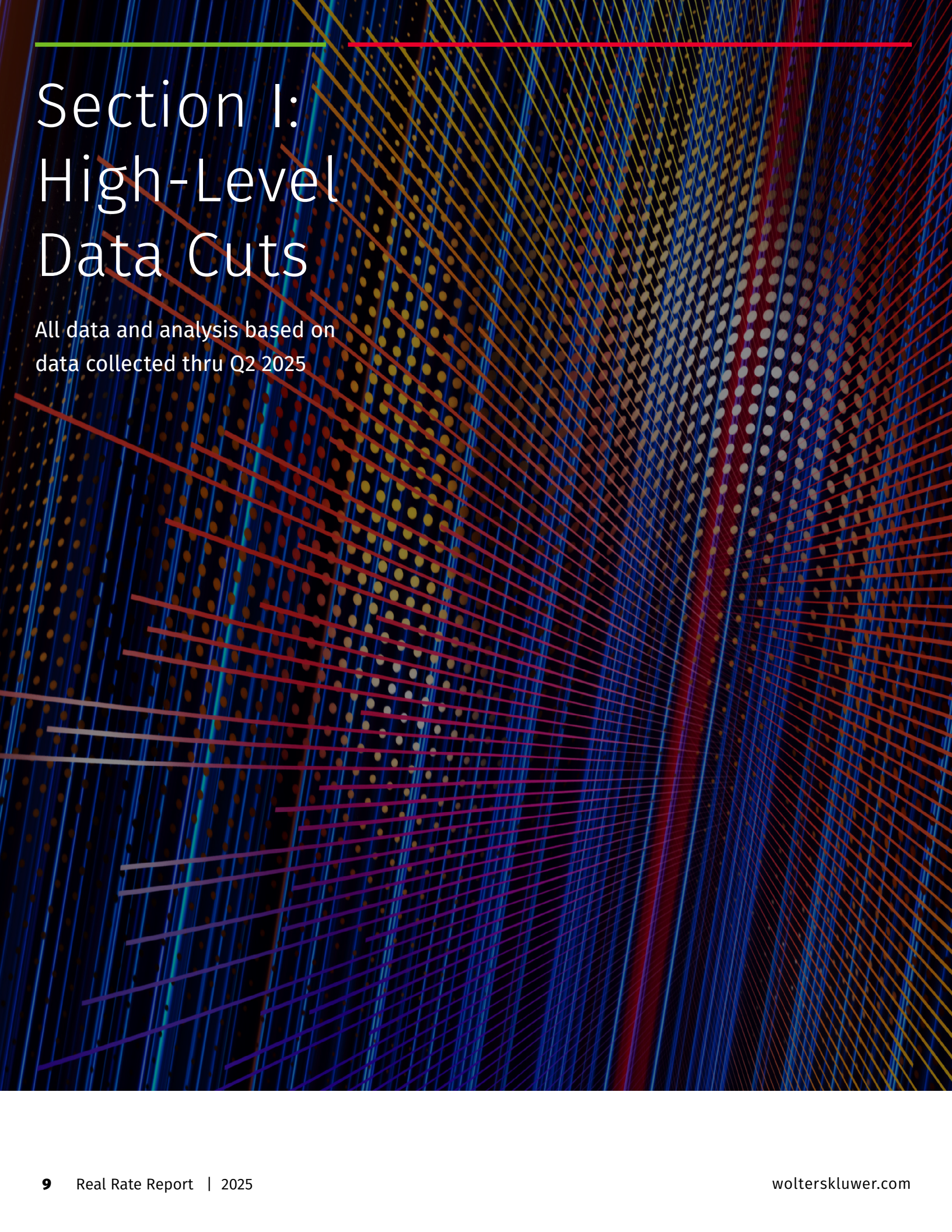
LegalVIEW® DynamicInsights

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

Data that wins awards...and rate negotiations

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





Section I: High-Level Data Cuts

All data and analysis based on
data collected thru Q2 2025

Section I: High-Level Data Cuts

Cities

By Matter Type

2025 Real Rates for Associate and Partner

Trend Analysis - Mean

City	Matter Type	Role	n	First Quartile	Median	Third Quartile	2025	2024	2023
San Francisco CA	Litigation	Partner	106	\$400	\$718	\$1,378	\$908	\$819	\$803
		Associate	80	\$385	\$666	\$875	\$683	\$652	\$614
	Non-Litigation	Partner	132	\$445	\$689	\$1,249	\$856	\$868	\$788
		Associate	97	\$335	\$550	\$922	\$640	\$664	\$593
San Jose CA	Litigation	Partner	23	\$650	\$800	\$1,250	\$998	\$1,024	\$1,011
		Associate	20	\$625	\$815	\$1,030	\$852	\$802	\$721
	Non-Litigation	Partner	33	\$745	\$950	\$1,266	\$1,033	\$1,104	\$1,108
		Associate	27	\$527	\$610	\$966	\$718	\$709	\$701
Seattle WA	Litigation	Partner	57	\$520	\$902	\$925	\$790	\$719	\$628
		Associate	29	\$425	\$653	\$700	\$586	\$518	\$475
	Non-Litigation	Partner	119	\$402	\$615	\$925	\$694	\$635	\$652
		Associate	79	\$307	\$445	\$676	\$496	\$484	\$467



Section II: Industry Analysis

All data and analysis based on
data collected thru Q2 2025

Section II: Industry Analysis

Consumer Services

By Detailed Practice Area and
Matter Type

2025 - Real Rates for Associate and Partner

Trend Analysis - Mean

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

EXHIBIT 2

EXHIBIT 2

SUMMARY OF RECOVERABLE LITIGATION COSTS

Category	Description	Amount
Court Filing Fees	Alameda Superior Court filing fees; One Legal eFiling fees	\$5,942.31
Service of Process	Professional process server fees	\$915.28
Court Records & Document Retrieval	Court document retrieval and copying	\$1,160.07
Electronic Filing / Document Services	DocuSign / DTF	\$1.89
Government Filing Fees	California Department of Industrial Relations (LWDA) filing fee and related agency	\$254.86
TOTAL LITIGATION COSTS		\$8,274.41