

John G. Yslas (SBN 187324)
john.yslas@wilshirelawfirm.com
Diego Aviles (SBN 315533)
diego.aviles@wilshirelawfirm.com
Harry Erganyan (SBN 333091)
harry.erganyan@wilshirelawfirm.com
Mariam Nazaretyan (SBN 334154)
mariam.nazaretyan@wilshirelawfirm.com
Lucy H. Nguyen (SBN 338783)
lucy.nguyen@wilshirelawfirm.com
WILSHIRE LAW FIRM, PLC
660 S. Figueroa Street, Sky Lobby
Los Angeles, California 90017
Telephone: (213) 381-9988
Facsimile: (213) 381-9989

Attorneys for Plaintiffs Desiree Cumpian
and Evelyn Pasquel-Herrera

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

YULISSA MEDINA, on behalf of herself and
“aggrieved” employees pursuant to Labor
Code section 2698, et seq.,

Plaintiff,

vs.

24 HOUR FITNESS USA, LLC., a California
limited liability company; and DOES 1-10,
inclusive.

Defendants.

Case No. 24CV089740

Assigned to Hon. Mark Fickes, Dept. 518

**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: July 23, 2026

Time: 2:30 p.m.

Dept.: 518

Action Filed: August 30, 2024

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 Desiree Cumpian and Evelyn Pasquel-Herrera (collectively “Plaintiffs Cumpian and Pasquel-Herrera”) in connection with the above-captioned action and related proceedings involving Defendant 24 Hour Fitness USA, LLC (“Defendant”). I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would competently testify thereto.

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

3. Plaintiffs Cumpian and Pasquel-Herrera 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. On October 23, 2024, Plaintiffs filed this action as a putative class action against Defendant 24 Hour Fitness USA, LLC (“Defendant”) alleging: (1) failure to pay minimum and straight time wages; (2) failure to pay overtime wages; (3) failure to provide meal periods; (4) failure to authorize and permit rest periods; (5) failure to timely pay final wages at termination; (6) failure to provide accurate itemized wage statements; (7) failure to indemnify employees for expenditures; (8) violation of the California Equal Pay Act, and (9) unfair business practices.

5. On November 6, 2024, Plaintiffs provided written notice to the LWDA and Defendant of their intention to file a PAGA claim. The LWDA did not notify Plaintiffs that it intended to investigate within 65 days of this written notice. Therefore, on January 21, 2025, Plaintiffs filed a First Amended Complaint adding an allegation under PAGA on behalf of themselves, the state of California, and Defendant’s non-exempt employees in California based on the same underlying alleged Labor Code violations.

1 6. Plaintiff's Counsel has negotiated a settlement here that they believe is fair,
2 reasonable, and adequate based on their prior experience litigating these type of cases.

3 7. **Department of Child Support Services Lien.** During the settlement
4 approval process, the California Department of Child Support Services served a Notice of
5 Lien relating to named Plaintiff, Desiree Cumpian. The Notice of Lien reflected an asserted
6 outstanding balance of approximately \$1,320.73 at the time it was filed. Counsels have
7 coordinated regarding the asserted lien and will ensure that any required withholding or
8 payment from Ms. Cumpian's settlement proceeds is handled by the Settlement
9 Administrator in accordance with applicable law. To be extra clear, Ms. Cumpian is not
10 receiving any separate settlement payment apart from the class settlement and the lien is
11 limited to amounts payable directly to her (whether via enhancement award or separate
12 class member payment). The lien does not affect the fairness, adequacy, or reasonableness
13 of the Settlement or the relief provided to the Settlement Class.

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

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

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

27 11. Upon graduating from law school in 1996, I worked for a boutique law
28

1 firm practicing general litigation which included employment law matters. Since 2000
2 (that is, the last 25 years) my practice has been exclusively focused on labor and
3 employment matters including handling wage and hour class, collective and
4 representative actions (including the California Private Attorneys General Act, or
5 “PAGA”), including in the international law firms of Morgan, Lewis & Bockius LLP
6 (where I was a senior associate), Foley & Lardner LLP (where I was a partner and a
7 national Vice Chair of the Labor and Employment Group), Norton Rose Fulbright LLP
8 (where I was a partner) and Seyfarth Shaw LLP (where I was a partner and member of
9 the Wage and Hour Practice Group). During my time at these law firms, I was the primary
10 attorney or took a major leading role in defending employers on numerous wage and hour
11 class, collective and representative actions.

12 12. In late June 2022 I left Seyfarth Shaw LLP and joined my current firm,
13 Wilshire Law Firm, PLC, to represent plaintiff employees. I have been and am handling
14 many wage and hour class and representative actions litigating such matters on behalf of
15 plaintiff employees in numerous Superior Courts and District Courts. From matters
16 representing both plaintiffs and defendants, I have successfully mediated the resolution
17 of many wage and hour class, collective, and representative actions. Just since starting to
18 settle cases in late April 2023 I have already successfully mediated matters in which I
19 have been counsel or co-counsel resulting in **well over \$265 million** in settlements and
20 verdicts which are in the process of being finalized, and with numerous upcoming
21 mediations scheduled. In those and numerous other matters, I have managed and assisted
22 with the litigation and settlement of many wage and hour PAGA and class actions. In
23 those actions, I performed similar tasks as those performed in the course of prosecuting
24 this action. Indeed, I recently tried and prevailed in achieving a jury verdict in a certified
25 wage and hour class action in the matter of *Aguilar-Flores v. Javier’s – CC LLC*, Los
26 Angeles County Superior Court, Case No. 19STCV36438 (settled after verdict).

27 13. I have received numerous awards for my legal work. For example, from
28

1 2015 to 2018, I was listed in Los Angeles Super Lawyers for Employment Litigation
2 (Thomson Reuters). I have also served on numerous prominent boards and in other
3 leadership positions, including serving as Southern California Regional President for the
4 Hispanic National Bar Association and on the board of directors of the Mexican
5 American Bar Foundation. I also previously served on the 5-member Los Angeles Civil
6 Service Commission, which generally oversees the personnel decisions for the City of
7 Los Angeles.

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

16 15. **Diego Aviles** is a Junior Partner at WLF. Mr. Aviles graduated from the
17 University of California, Irvine, with a Bachelor of Arts in Political Science as well as a
18 Bachelor of Arts in Criminology, Law, and Society, and received his Juris Doctor from the
19 Santa Clara University School of Law in 2015. During law school, Mr. Aviles was
20 President for the Santa Clara Employment Law Society, Board Member of the Honors
21 Moot Court, and President of the Santa Clara University La Raza Chapter. He clerked for
22 the Equal Employment Opportunity Commission in San Francisco, California, and also
23 worked with the Workers’ Rights Clinic in San Jose, California, among other employment
24 law firms. He was admitted to practice law in the State of California in 2017. Since
25 graduating from law school, he has focused his legal work exclusively on employment
26 matters, including wage-and-hour class action and PAGA representative action litigation,
27 and he has helped obtain dozens of settlements on behalf California workers. He has been
28

1 appointed Class Counsel numerous times in California and most recently achieved a
2 published California Appellate opinion in the matter of Alberto v. Cambrian Homecare, et
3 al., 91 Cal.App.5th 482 regarding employment arbitration agreements. He has also been a
4 member of the California Employment Lawyers Association (CELA) since at least 2019.
5 Mr. Aviles currently bills at an hourly rate of \$850.00.

6 16. **Lucy H. Nguyen** is a Settlement Attorney at WLF. She graduated from San
7 Francisco State University with a Bachelor of Science degree in Business Management and
8 earned her Juris Doctor from John F. Kennedy University, School of Law in 2011. Ms.
9 Nguyen was admitted to practice law in the State of California in 2021. Prior to joining
10 WLF, Ms. Nguyen practiced employment and family law litigation and handled a high-
11 volume statewide docket involving wage-and-hour disputes and complex litigation matters.
12 Since joining WLF, Ms. Nguyen has focused her practice on wage-and-hour class actions
13 and representative actions under the California Private Attorneys General Act (“PAGA”),
14 including drafting and negotiating class and PAGA settlements, approval motions, and
15 related settlement documents. In this and other matters, Ms. Nguyen has performed work
16 including analyzing exposure, drafting settlement agreements and approval papers,
17 coordinating settlement administration issues, and assisting with class and PAGA
18 settlement approval proceedings. Ms. Nguyen currently bills at an hourly rate of \$600.00.

19 17. **Harry Erganyan** is an Associate Attorney at WLF. He was admitted to
20 practice law in the State of California in 2021. Mr. Erganyan graduated from Loyola
21 Marymount University with a Bachelor of Arts in Political Science. He received his Juris
22 Doctor from Southwestern Law School. During law school, he externed for the Los
23 Angeles City Attorney. Since January 2021, Mr. Erganyan’s practice has been focused on
24 wage and hour class action litigation. Mr. Erganyan currently bills at an hourly rate of
25 \$650.00.

26 18. **Mariam Nazaretyan** is an Associate Attorney at WLF. She was admitted to
27 practice law in the State of California in 2021. Ms. Nazaretyan graduated from Loyola
28

1 Marymount University with a Bachelor of Arts in Political Science. She received her Juris
2 Doctor from Southwestern Law School. During law school, she was a student editor for
3 the Journal of International Media and Entertainment Law and secretary of the Student Bar
4 Association. Since graduating, Ms. Nazaretyan's practice has been focused on international
5 humanitarian law and employment law. Ms. Nazaretyan currently bills at an hourly rate of
6 \$650.00.

7 19. WLF's hourly rates are comparable to those charged by other class action
8 plaintiffs' counsel and the firms defending class actions. WLF's rates are well within the
9 range of hourly rates that the Los Angeles legal marketplace would compensate counsel
10 for similar services accomplishing similar results. For example, in *Bronshteyn v. State of*
11 *California*, Los Angeles County Superior Ct. No. 19SMCV00057, Order Granting
12 Plaintiff's Motion for Statutory Attorneys' Fees and Costs filed March 30, 2023, an
13 employment action brought by two small law firms (Levy, Vinick, Burrell & Hyams LLP
14 and Law Offices of Wendy Musell), the court found that counsel's 2022 hourly rates of
15 \$1,100 and \$1,000 per hour were reasonable for the plaintiff's five senior attorneys,
16 including \$1,000 per hour for the plaintiff's 23-year lead counsel and \$850 per hour for a
17 senior associate. These rates were then augmented by a 1.75 lodestar multiplier and
18 affirmed by the California Court of Appeals. The rates (and multiplier) requested here are
19 well in line with those found reasonable in *Bronshteyn*. In *Tran v. Golden State FC LLC,*
20 *et al.* (LASC Case No. BC699931), Fee Order filed 4/8/2022, the court found hourly rates
21 of \$1,300 per hour reasonable for plaintiff's 32-year attorney and \$1,000 per hour
22 reasonable for a 14-year attorney. The multiplier here is even more compelling given Class
23 Counsel represents approximately 15,185 Class Members.

24 20. WLF has been approved as class counsel by courts in California. See, e.g.,
25 *Matthew Veliz v. DrinkPak, LLC*, Los Angeles County Superior Court, Case No.
26 *22STCV37384*, *Ismael Villegas-Sanchez v. COE Orchard Equipment, Inc.*, Sutter County
27 Superior Court, Case No. *CVCS22-0002261*; *Jessica Bronsal v. PTI Technologies Inc.*,
28

1 Ventura County Superior Court, Case No. 202200570361CUOE; Miguel A. Vigil Ruiz v.
2 The De Ruosi Group, LLC, San Joaquin County Superior Court, Case No. STK-CV-UOE-
3 2022-8780; Gutierrez v. Top Drawer Merch, LLC et al, Los Angeles County Superior
4 Court, Case No. 23STCV04299; Wing v. Road Machinery, LLC et al, Kern County
5 Superior Court, Case No. BCV-22-102896; Hernandez v. SGPS Showrig Los Angeles, Inc.,
6 Los Angeles County Superior Court, Case No. 22STCV28155; Azevedo v. Tulare Nursing
7 & Rehabilitation Hospital, Inc., Tulare County Superior Court, Case No. VCU293325;
8 Haser v. Universal Chain of California, Inc., Sacramento County Superior Court, Case No.
9 34-2022-00332268; Caldera v. Performance Online, Inc. et al, Riverside County Superior
10 Court, Case No. CVRI2306013; Goosby v. CiminoCare, Inc., Sacramento County Superior
11 Court, Case No. 34-2022-00329033; Rooks v. Hot Cakes Restaurant Group, Inc., San
12 Joaquin County Superior Court, Case No. STK-CV-UOE-2022-11056; Garcia v.
13 Compassionate Heart, Orange County Superior Court, Case No. 30-2022-01294409-CU-
14 OE-CXC; Parra v. Citrus Valley Management Services, Inc., Riverside County Superior
15 Court, Case No. CVRI2301768; Torres v. HomeShield Pest Control Inc., Placer County
16 Superior Court, Case No. S-CV-0049525; Cabrera v. Creekside Auto Group, Santa Clara
17 County Superior Court, Case No. 23CV415661; Simpson v. Arcos, Riverside Superior
18 Court, Case No. CVRI2303337; Payne v. Planned Parenthood: Shasta-Diablo, Inc., San
19 Francisco County Superior Court, Case No. CGC-23-607359. The total hours expended on
20 this action are reasonable and in line with those expended in comparable cases.

21 21. In cases in which WLF has been approved as class counsel, California
22 courts have approved rates similar to those requested by WLF in the instant case. See, e.g.,
23 Rodolfo Ponce v. Youbar, Inc., Los Angeles County Superior Court, Case No.
24 22STCV37519 (WLF's rates were approved as follows: John G. Yslas (\$1,500.00),
25 Samantha A. Smith (\$1,000.00), Jeffrey C. Bils (\$850.00), Aram Boyadjian (\$600.00),
26 Lisa B. Iturriaga (\$550.00), and Andrew Sandoval (\$500.00)); Sabrina N. Batres v. Wish
27 Automotive II, Inc. dba Infiniti of Van Nuys, Los Angeles County Superior Court, Case
28

No. 23STCV19968 (WLF's rates were approved as follows: John G. Yslas (\$1,500.00), Jeffrey C. Bills (\$850.00), Aram Boyadjian (\$600.00), Lisa B. Iturriaga (\$550.00), and Andrew Sandoval (\$500.00)); Diandrea Correa et al. v. CareMeridian, LLC, et. al., Los Angeles County Superior Court, Case No. 23STCV10707 (WLF's rates were approved as follows: John G. Yslas (\$1,500.00), Samantha A. Smith (\$1,000.00), Jeffrey C. Bills (\$850.00), Fawn F. Bekam (\$800.00), Diego Aviles (\$800.00), Aram Boyadjian (\$600.00), Harry Erganyan (\$600.00), Lisa B. Iturriaga (\$550.00), and Andrew Sandoval (\$500.00)); Carlos Santos Granados v. Sunny Hills Management Co., Inc., Los Angeles County Superior Court, Case No. 23STCV02109 (WLF's rates were approved as follows: John G. Yslas (\$1,500.00), Samantha A. Smith (\$1,000.00), Jeffrey C. Bills (\$850.00), Diego Aviles (\$750.00), Courtney M. Miller (\$650.00), Aram Boyadjian (\$600.00), Harry Erganyan (\$600.00), Mariam Nazaretyan (\$550.00), Lisa B. Iturriaga (\$550.00), and Andrew Sandoval (\$500.00)); Kayla Kurges v. Khanna Enterprises, Ltd. dba Sheraton Agoura Hills, Los Angeles County Superior Court, Case No. 24STCV01590 (WLF's rates were approved as follows: John G. Yslas (\$1,500.00), Jeffrey C. Bills (\$850.00), Aram Boyadjian (\$600.00), Lisa B. Iturriaga (\$550.00), and Andrew Sandoval (\$500.00)); Thora Magney et al. v. Levi Strauss & Co., et al., Los Angeles County Superior Court, Case No. 24STCV02320 (WLF's rates were approved as follows: John G. Yslas (\$1,500.00), Samantha A. Smith (\$1,000.00), Jeffrey C. Bills (\$850.00), Fawn F. Bekam (\$800.00), Aram Boyadjian (\$600.00), Lisa B. Iturriaga (\$550.00), and Andrew Sandoval (\$500.00)); Armando Muniz, et al. v. Lot LLC, dba Lot Management LLC (fka Red Cow, Inc.) et. al., Los Angeles County Superior Court, Case No. 22STCV32901 (WLF's rates were approved as follows: John G. Yslas (\$1,500.00), Samantha A. Smith (\$1,000.00), Jeffrey C. Bills (\$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)); George Munoz v. Century West, LLC dba Century West BMW, Los Angeles County Superior Court, Case No. 23STCV04247 (WLF's rates were approved as follows:

1 John G. Yslas (\$1,500.00), Samantha A. Smith (\$1,000.00), Jeffrey C. Bils (\$850.00),
2 Aram Boyadjian (\$600.00), Lisa B. Iturriaga (\$550.00), and Andrew Sandoval (\$500.00));
3 Ivan S. Martinez II et. al. v. The Haar Company, et. al., Los Angeles County Superior Court,
4 Case No. 23STCV21651 (WLF's rates were approved as follows: John G. Yslas
5 (\$1,500.00), Samantha A. Smith (\$1,000.00), Jeffrey C. Bils (\$850.00), Diego Aviles
6 (\$750.00), Aram Boyadjian (\$600.00), Harry Erganyan (\$600.00), Mariam Nazaretyan
7 (650.00), Lisa B. Iturriaga (\$550.00), and Andrew Sandoval (\$500.00)).

8 22. In support of the reasonableness of WLF's hourly rates, attached as **Exhibit**
9 **1** is a true and correct excerpt from the *2025 Real Rate Report* published by Wolters Kluwer.
10 The Real Rate Report is widely relied upon in the legal industry because it is derived from
11 anonymized billing data taken from actual law firm invoices that were submitted to clients
12 and approved for payment, rather than from voluntary surveys or self-reported rates.
13 Although the report refers to "2025" rates, the data reflects rates charged by law firms
14 during the first half of 2024 and therefore represents the most recent available objective
15 evidence of prevailing market rates.

16 a. The report provides rate information filtered by geographic market,
17 practice type, and timekeeper role. Page 26 reports third-quartile rates for attorneys
18 handling litigation matters in San Francisco and San Jose, which are the primary Northern
19 California legal markets and serve as the dominant rate-setting centers for complex
20 litigation throughout the region. In San Francisco, the dataset shows third-quartile hourly
21 rates of \$1,378 for litigation partners and \$875 for associates. In San Jose, the report shows
22 third-quartile hourly rates of \$1,250 for litigation partners and \$1,030 for associates. The
23 report's in-depth city analyses for San Francisco and San Jose further confirm that these
24 markets consistently reflect some of the highest billing rates in the country for experienced
25 litigators and serve as the benchmark markets for Northern California legal services. Courts
26 evaluating fee requests in Northern California routinely look to the prevailing rates in the
27 nearest major metropolitan markets as benchmarks when assessing reasonableness. The
28

1 closest and most relevant comparison markets for Fresno litigation are San Francisco and
2 San Jose, where experienced partners routinely bill well above \$1,200 per hour based on
3 rates actually charged to clients.

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

15 c. The Real Rate Report does not provide 1st quartile or 4th quartile
16 rates, presumably to provide a sense of the average attorney billing rates. Importantly, the
17 third quartile represents the point below which 75% of rates fall; it is not a cap on
18 reasonable rates. By definition, a substantial portion of partners in the relevant benchmark
19 market routinely bill above that level, particularly those with extensive experience,
20 specialized expertise, or leadership roles in complex litigation. Courts evaluating fee
21 requests recognize that leading counsel in complex or representative actions may
22 reasonably bill above median or third-quartile benchmarks where their experience, results
23 obtained, and responsibilities justify higher rates. We firmly believe WLF belongs in the
24 4th quartile of attorney billing rates in Northern California. As previously discussed, WLF
25 is a nationally recognized employment litigation firm that has been named one of the
26 nation's Best Law Firms by U.S. News & World Report and Best Lawyers since 2020, and
27 its attorneys regularly litigate complex wage-and-hour class and representative actions
28

1 throughout California. I am a UCLA School of Law graduate with nearly three decades of
2 experience litigating labor and employment matters—including as a partner and holding
3 leadership roles at major international law firms when I was on the defense side for 26
4 years, as well as substantial recent class and representative action results including being
5 one of the few attorneys in the state of California to try a wage and hour class action to
6 verdict (and prevail), and achieving results exceeding \$225 million in just the last three
7 years since starting to settle matters as a plaintiffs’ attorney. My credentials and experience
8 place my \$1,500 hourly rate within the highest tier of Northern California employment
9 litigators, consistent with rates that would fall within the fourth quartile beyond those
10 reported in the Real Rate Report.

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

- 14 a) Investigating, evaluating and researching the matter, including meeting with
15 Plaintiffs Cumpian and Pasquel-Herrera, reviewing Defendant’s policies, and
16 requesting and reviewing Plaintiffs Cumpian and Pasquel-Herrera’s time and
17 payroll records, personnel file, and exploring the corporate structure of
18 Defendant;
- 19 b) filing an action;
- 20 c) opposing Defendant’s Motion to Compel Arbitration;
- 21 d) attending hearings and meeting and conferring with Defendant regarding the
22 case;
- 23 e) communicating with Plaintiffs Cumpian and Pasquel-Herrera;
- 24 f) communicating and coordinating with co-counsel;
- 25 g) participating in negotiating, finalizing and fully executing the settlement
26 agreement;
- 27 h) preparing supporting documents for the Motion for Preliminary Approval;

i) communicating with the settlement administrator;

24. WLF's current lodestar reflects the efficiencies achieved by attorneys experienced in this field with 92.8 hours of work resulting in \$79,625.00 in fees. A true and correct copy of WLF's detailed billing records in this matter is attached hereto as **Exhibit 3**. The chart below shows the calculation of hours spent by each of WLF's attorneys on this case:

Attorney	Hours	Hourly Rate	Total
John G. Yslas	18.5	\$1,500.00	\$27,750.00
Diego Aviles	21.8	\$850.00	\$18,530.00
Harry Erganyan	8.5	\$650.00	\$5,525.00
Mariam Nazaretyan	28.4	\$650.00	\$18,460.00
Lucy H. Nguyen	15.6	\$600.00	\$9,360.00
TOTAL	92.8		\$79,625.00

25. WLF's lodestar does not include the time WLF will spend at the Final Approval Hearing and assisting the Settlement Administrator following final approval. 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 time could have been spent on other potentially lucrative cases. WLF's lodestar reflects the efficiencies achieved by attorneys experienced in this field. Moreover, WLF has assumed the risk and costs of litigation purely on a contingency basis. And, while Plaintiffs Cumpian and Pasquel-Herrera are confident in the merits of their claims, a legitimate controversy exists as to each cause of action, posing an actual risk that they may not succeed at class certification and/or trial. Any of these obstacles could have prevented recovery completely, meaning WLF would have been left with no compensation for all the time and money invested. Despite these risks, WLF 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, WLF was precluded from focusing on, or taking on, other cases which could have resulted in a larger, and less risky, monetary gain.

26. In litigation costs, WLF has spent \$2,673.09 on items such as filing fees and service fees. This amount excludes postage and legal research charges. A true and correct copy of WLF's cost reports in this matter is attached hereto as **Exhibit 2**. All costs incurred by WLF were reasonable and necessary for the prosecution of this case.

27. Class Counsel has negotiated a settlement here that they believe is fair, reasonable, and adequate based on their prior experience in litigating these types of cases.

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

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

Executed on June 29, 2026, at Los Angeles, California.

John L. Brown

John G. Yslas



ELM Solutions

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analysis of law firm rates,
trends, and practices

Report Editor**Jennifer McIver**

Director, Legal Operations and Industry Insights
Wolters Kluwer ELM Solutions

Lead Data Analysts**Anand Kumar Pathinettam Padian**

Software and Data Engineer
Wolters Kluwer ELM Solutions

Farhan Shaikh

Data Scientist
Wolters Kluwer ELM Solutions

ELM Solutions Creative**David Andrews**

Senior Graphic Designer
Wolters Kluwer ELM Solutions

Contributing Analysts and Authors**Haemi Jung**

Strategic Business Intelligence Manager
Wolters Kluwer ELM Solutions

Manish Sharma

Director, Business Analysis
Wolters Kluwer ELM Solutions

Karen Sekley-Dandrea

Director, Marketing
Wolters Kluwer ELM Solutions

Mat Greener

Project & Program Management Director
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Wolters Kluwer ELM Solutions
2929 Allen Pkwy Ste 3300
Houston, TX 77019 United States
ATTN: Marketing
ELMSolutionsSales@wolterskluwer.com

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- Environmental
- Finance and Securities
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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

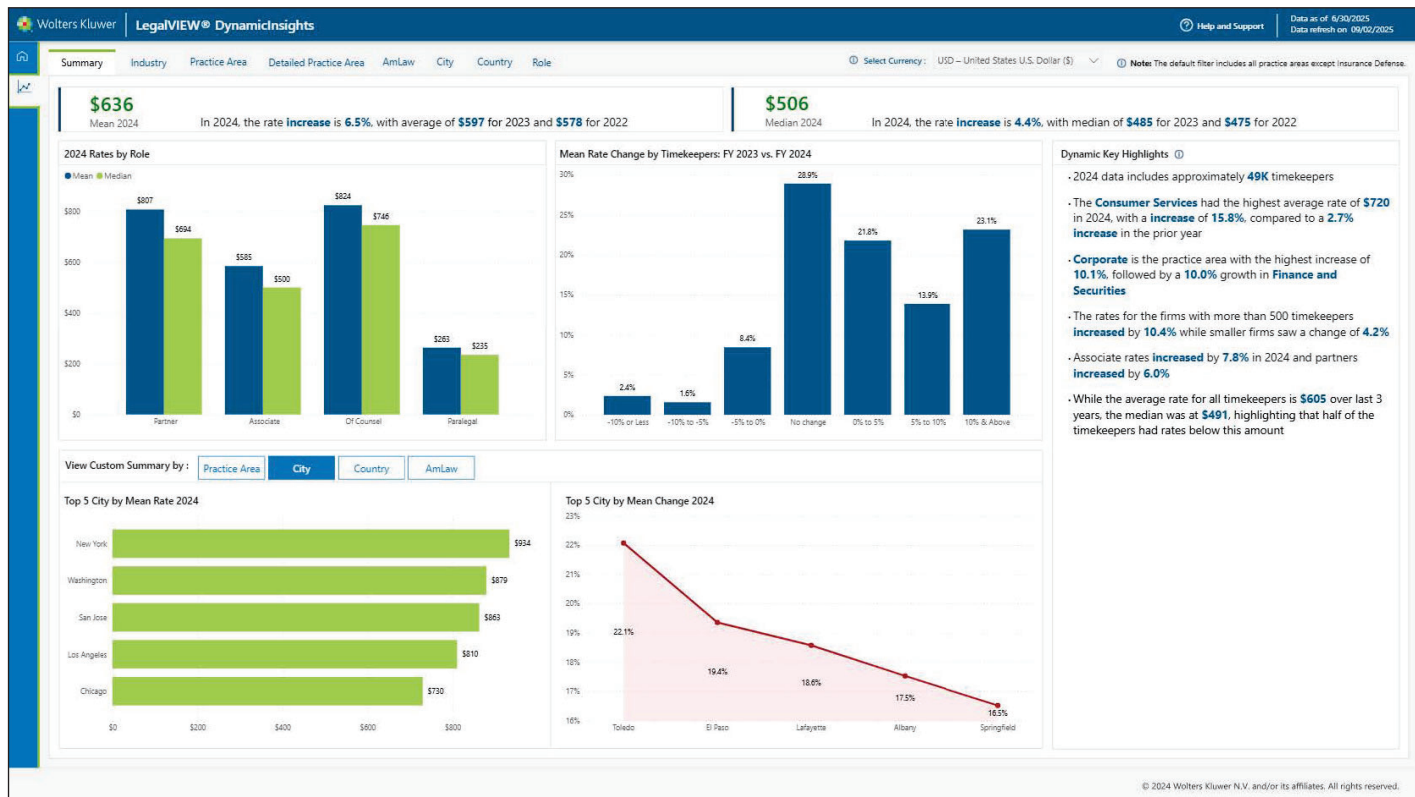
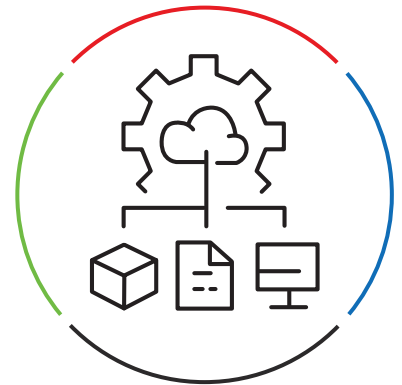


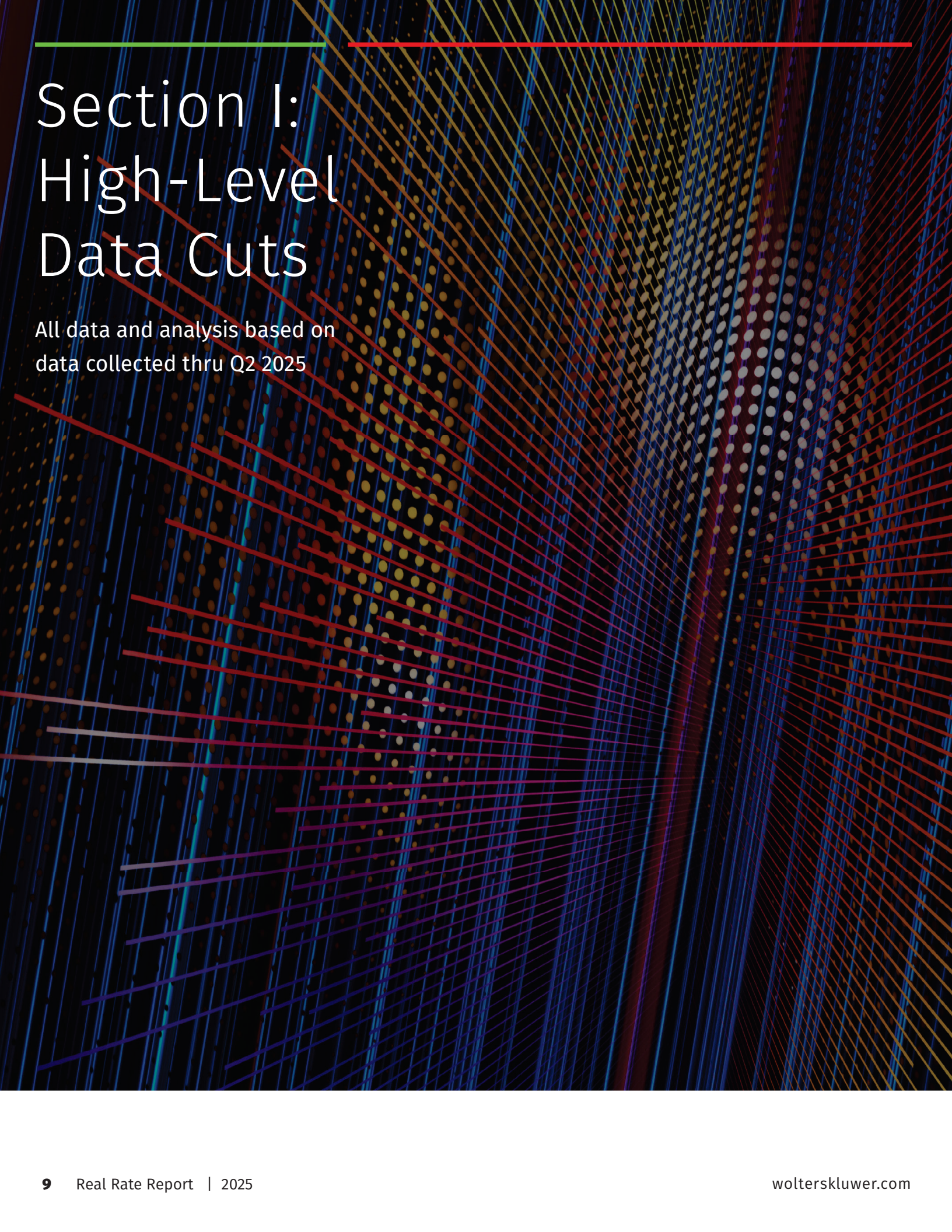
LegalVIEW® DynamicInsights

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

Expenses Subtotals - Filtered Exp. Type

As of 2026-06-08 15:41:48 Pacific Standard Time/PST • Generated by Louis Montgomery

Filtered By

Show: All matters

Matter: ID equals a0LPc00000HQ7qW

Expense Type equals E127 — DTF,E108 — Postage,E102 — Printing

Display Name ↑	Expense Type ↑	Date	Expense: Expense ID	Provider Name	Note	Amount	Reduction Amount	Amount Paid	Amount Due.
Desiree Cumpian Wage & Hour: 2/16/2024	E108 — Postage	11/7/2024	E-3237642			\$8.44			\$8.44
		10/17/2024	E-3233888			\$8.16			\$8.16
		10/17/2024	E-3233887			\$8.16			\$8.16
	Subtotal	Sum				\$24.76	\$0.00	\$0.00	\$24.76
		Count	3						
Subtotal		Sum				\$24.76	\$0.00	\$0.00	\$24.76
		Count	3						
Total		Sum				\$24.76	\$0.00	\$0.00	\$24.76
		Count	3						

\$24.76 postage charge
has been stricken
from costs.



Client Cost Report

Account	Type	Date	Num	Name	Matter Display Name	Line Memo	Amount
501500 Cost of Sale : Court Filing Fees	C r e d i t Card	3/5/2026	CC033126TA-0295	One Legal LLC	24 Hour Fitness USA, LLC (Cumpan) - Wage & Hour (Class Action)	27601762-258633-Atty Svc for Court Filing-Declar,POS-Desiree Cumpan-2/16/2024	\$37.73
501500 Cost of Sale : Court Filing Fees	C r e d i t Card	3/11/2026	CC033126TA-1611	Los Angeles Superior Court	24 Hour Fitness USA, LLC (Cumpan) - Wage & Hour (Class Action)	RM PA-2026-346414042 Ntc of Lien - Desiree Cumpan 258633	\$9.40
501500 Cost of Sale : Court Filing Fees	C r e d i t Card	3/11/2026	CC033126TA-1612	Los Angeles Superior Court	24 Hour Fitness USA, LLC (Cumpan) - Wage & Hour (Class Action)	RM PA-2026-346414042 Ntc of Lien - Desiree Cumpan 258633	\$9.40
501500 Cost of Sale : Court Filing Fees	C r e d i t Card	4/9/2026	CC043026TA-0827	One Legal LLC	24 Hour Fitness USA, LLC (Cumpan) - Wage & Hour (Class Action)	27926501-Atty Svc for Court Filing-Stip & Ord,POS-Desiree Cumpan-258633	\$47.30
501500 Cost of Sale : Court Filing Fees	C r e d i t Card	4/10/2026	CC043026TA-0934	One Legal LLC	24 Hour Fitness USA, LLC (Cumpan) - Wage & Hour (Class Action)	27944462-Atty Svc for Court Filing-Req for Dismissal,Declar,POS-Desiree Cumpan-258633	\$18.58
501500 Cost of Sale : Court Filing Fees	C r e d i t Card	4/13/2026	CC043026TA-1081	One Legal LLC	24 Hour Fitness USA, LLC (Cumpan) - Wage & Hour (Class Action)	27950340-Atty Svc for Court Filing-Dismissal,Declar,POS-Desiree Cumpan-258633	\$18.58
501500 Cost of Sale : Court Filing Fees	C r e d i t Card	4/14/2026	CC043026TA-1098	One Legal LLC	24 Hour Fitness USA, LLC (Cumpan) - Wage & Hour (Class Action)	27960401-Atty Svc for Court Filing-Declar,POS,Order-Desiree Cumpan-258633	\$46.26
501500 Cost of Sale : Court Filing Fees	C r e d i t Card	7/1/2025	CC073125TA-648	One Legal LLC	24 Hour Fitness USA, LLC (Cumpan) - Wage & Hour (Class Action)	25726701-258633-Atty Svc for Court Filing-Change of Address-24 Hour Fitness USA, LLC (Cumpan) - Wage & Hour (Class Action)	\$23.44
501500 Cost of Sale : Court Filing Fees	C r e d i t Card	10/28/2025	CC103125TA-2794	One Legal LLC	24 Hour Fitness USA, LLC (Cumpan) - Wage & Hour (Class Action)	26637705-258633-Atty Svc for Court Filing-SCR-Desiree Cumpan-2/16/2024	\$26.54
502500 Cost of Sale : Legal Expenses	Bill	7/1/2025	417452	Case Anywhere LLC	24 Hour Fitness USA, LLC (Cumpan) - Wage & Hour (Class Action)	417452-24 Hour Fitness USA, LLC (Cumpan)-System Access Fee & Document Service Fee	\$66.00
502500 Cost of Sale : Legal Expenses	Bill	8/4/2025	429995	Case Anywhere LLC	24 Hour Fitness USA, LLC (Cumpan) - Wage & Hour (Class Action)	429995-Desiree Cumpan-System Access Fee 07/01/25 to 07/31/25	\$59.00
502500 Cost of Sale : Legal Expenses	Bill	9/2/2025	442425	Case Anywhere LLC	24 Hour Fitness USA, LLC (Cumpan) - Wage & Hour (Class Action)	442425-24 Hour Fitness USA, LLC (Cumpan)-System Access Fee 8/1/25 - 8/31/25	\$59.00
502500 Cost of Sale : Legal Expenses	Bill	10/1/2025	455037	Case Anywhere LLC	24 Hour Fitness USA, LLC (Cumpan) - Wage & Hour (Class Action)	455037-24 Hour Fitness USA, LLC (Cumpan)-System Access Fee 9/1/25 - 9/30/25	\$59.00
502500 Cost of Sale : Legal Expenses	Bill	11/3/2025	467834	Case Anywhere LLC	24 Hour Fitness USA, LLC (Cumpan) - Wage & Hour (Class Action)	467834-Desiree Doreen Cumpan-Billing Period: 10/01/25-10/31/25-258633	\$59.00
502500 Cost of Sale : Legal Expenses	Bill	12/1/2025	480807	Case Anywhere LLC	24 Hour Fitness USA, LLC (Cumpan) - Wage & Hour (Class Action)	480807-Desiree Doreen Cumpan-Billing Period: 11/01/25-11/30/25-258633	\$59.00
502500 Cost of Sale : Legal Expenses	Bill	1/2/2026	493636	Case Anywhere LLC	24 Hour Fitness USA, LLC (Cumpan) - Wage & Hour (Class Action)	493636-Desiree Doreen Cumpan-Billing Period: 12/01/25-12/31/25-258633	\$59.00
502500 Cost of Sale : Legal Expenses	Bill	2/1/2026	506683	Case Anywhere LLC	24 Hour Fitness USA, LLC (Cumpan) - Wage & Hour (Class Action)	506683-Desiree Doreen Cumpan-Billing Period: 01/01/26 - 01/31/26-258633	\$59.00

Account	Type	Date	Num	Name	Matter Display Name	Line Memo	Amount
502500 Cost of Sale : Legal Expenses	Bill	3/2/2026	520003	Case Anywhere LLC	24 Hour Fitness USA, LLC (Cumpian) - Wage & Hour (Class Action)	520003-Desiree Doreen Cumpian-Billing Period: 02/01/26 - 02/28/26-258633	\$59.00
502500 Cost of Sale : Legal Expenses	Bill	4/1/2026	533297	Case Anywhere LLC	24 Hour Fitness USA, LLC (Cumpian) - Wage & Hour (Class Action)	533297-Desiree Cumpian-Billing Period: 03/01/26 - 03/31/26-258633	\$59.00
502500 Cost of Sale : Legal Expenses	Bill	5/1/2026	546878	Case Anywhere LLC	24 Hour Fitness USA, LLC (Cumpian) - Wage & Hour (Class Action)	546878-Desiree Doreen Cumpian-Billing Period: 4/1/26 - 4/30/26-258633	\$122.00
502500 Cost of Sale : Legal Expenses	Bill	6/1/2026	560308	Case Anywhere LLC	24 Hour Fitness USA, LLC (Cumpian) - Wage & Hour (Class Action)	560308-Desiree Doreen Cumpian-Billing Period: 5/1/26 - 5/31/26-258633	\$59.00
Total							\$1,015.23

Wilshire Law Firm, PLC
Client Costs Detailed Report
All Transactions

Type	Date	Num	Class	Source Name	Memo	Amount	Balance
500000 - COS							
501500 - Court Filing Fees							
Bill	02/04/2025	87305	24HourFitness(Cumplan) W&H	Valpro Attorney Services, LLC	87305-24HourFitness(Cumplan) W&H-File POS	45.00	45.00
Credit ...	10/23/2024	23996894	24HourFitness(Cumplan) W&H	One Legal LLC	23996894-258633-Atty Svc for Court Filing-Comp.CCOS-Sum-24...	1,504.04	1,549.04
Credit ...	10/25/2024	24003363	24HourFitness(Cumplan) W&H	One Legal LLC	24003363-258633-Atty Svc for Court Filing-Comp.CCOS-Sum-24...	51.63	1,600.67
Credit ...	10/28/2024	24014419	24HourFitness(Cumplan) W&H	One Legal LLC	24014419-258633-Atty Svc for Court Filing-POS-24HourFitness(...	21.37	1,622.04
Credit ...	11/26/2024	24217500	24HourFitness(Cumplan) W&H	One Legal LLC	24217500-258633-Atty Svc for Court Filing-Notice-24HourFitness...	21.37	1,643.41
Credit ...	01/21/2025	24542376	24HourFitness(Cumplan) W&H	One Legal LLC	24542376-258633-Atty Svc for Court Filing-Amended Comp-24H...	23.44	1,666.85
Credit ...	03/03/2025	24834653	24HourFitness(Cumplan) W&H	One Legal LLC	24834653-258633-Atty Svc for Court Filing-SCR-24HourFitness(...	23.44	1,690.29
Credit ...	05/08/2025	25332926	24HourFitness(Cumplan) W&H	One Legal LLC	25332926-258633-Atty Svc for Court Filing-Comp-24HourFitness(...	23.44	1,713.73
Total 501500 - Court Filing Fees						1,713.73	1,713.73
502500 - Legal Expenses							
Credit ...	10/03/2024		24HourFitness(Cumplan) W&H	Department of Industrial Relati...	RM LWIDA-CM-1060339-24 (258633) 24HourFitness(Cumplan)...	75.00	75.00
Bill	03/05/2025	369391	24HourFitness(Cumplan) W&H	Case Anywhere, LLC	369391 24HourFitness(Cumplan) W&H System Access Fee 2/25/...	8.26	83.26
Bill	04/04/2025	391393	24HourFitness(Cumplan) W&H	Case Anywhere, LLC	391393 24HourFitness(Cumplan) W&H System Access Fee 4/12/...	66.00	149.26
Bill	05/02/2025	393328	24HourFitness(Cumplan) W&H	Case Anywhere, LLC	393328 24HourFitness(Cumplan) W&H System Access Fee 4/12/...	59.00	208.26
Bill	06/02/2025	405307	24HourFitness(Cumplan) W&H	Case Anywhere, LLC	405307 24HourFitness(Cumplan) W&H System Access Fee 5/12/...	66.00	274.26
Bill	11/05/2024	851007265	24HourFitness(Cumplan) W&H	Thomson Reuters-West Publis...	Legal Research-24HourFitness(Cumplan) W&H	140.72	414.98
Bill	12/04/2024	851148941	24HourFitness(Cumplan) W&H	Thomson Reuters-West Publis...	Legal Research-24HourFitness(Cumplan) W&H	86.79	501.77
Bill	05/05/2025	85189366	24HourFitness(Cumplan) W&H	Thomson Reuters-West Publis...	Legal Research-24HourFitness(Cumplan) W&H	288.00	789.77
Bill	06/04/2025	852027928	24HourFitness(Cumplan) W&H	Thomson Reuters-West Publis...	Legal Research-24HourFitness(Cumplan) W&H	29.69	819.36
Total 502500 - Legal Expenses						819.36	819.36
503200 - Process Service Fees							
Bill	02/03/2025	87231	24HourFitness(Cumplan) W&H	Valpro Attorney Services, LLC	87231-24HourFitness(Cumplan) W&H-Servce: 24 Hour Fitness U...	140.00	140.00
Total 503200 - Process Service Fees						140.00	140.00
Total 500000 - COS						2,673.09	2,673.09
TOTAL						2,673.09	2,673.09

Thomson Reuters/Weslaw legal research charges:

\$140.72
\$86.79
\$288.00
\$29.59
= \$545.10 total excluded from costs.



Client Cost Report

Account	Type	Date	Num	Name	Matter Display Name	Line Memo	Amount
502500 Cost of Sale : Legal Expenses	Bill	11/1/2025	852770892	Thomson Reuters-West Publishing Corp	24 Hour Fitness USA, LLC (Pasquel-Herrera) - Wage & Hour (Class Action)	852770892-24 Hour Fitness USA, LLC (Pasquel-Herrera)	\$45.65
Total							\$45.65

legal research fees deducted.

EXHIBIT 3

WILSHIRE LAW FIRM, PLC

Attorney Lodestar, Detailed Billing Records, and Cost Summary

Medina, et al. v. 24 Hour Fitness USA, LLC
Alameda County Superior Court, Case No. 24CV089740

Prepared in Support of Plaintiffs' Motion for Final Approval and Motion for Attorneys' Fees, Costs, and Class Representative Service Awards

Contents

1. Lodestar Summary
2. Detailed Billing Records by Attorney
3. Wilshire Law Firm Cost Summary
4. Legal Research and Postage Deductions

WILSHIRE LAW FIRM LODESTAR SUMMARY

Medina, et al. v. 24 Hour Fitness USA, LLC

Attorney	Title	Hours	Rate	Lodestar
John G. Yslas	Partner	18.5	\$1,500.00	\$27,750.00
Diego Aviles	Junior Partner	21.8	\$850.00	\$18,530.00
Harry Erganyan	Associate	8.5	\$650.00	\$5,525.00
Mariam Nazaretyan	Associate	28.4	\$650.00	\$18,460.00
Lucy H. Nguyen	Associate	15.6	\$600.00	\$9,360.00
TOTAL		92.8		\$79,625.00

JOHN G. YSLAS*Hourly Rate: \$1,500.00*

Date	Hours	Standardized Billing Description
10/16/2024	0.6	Initial review of case materials; analyzed factual allegations and identified key legal issues and litigation strategy.
10/17/2024	3.5	Analyzed facts and applicable law; evaluated potential claims and litigation strategy in preparation for filing.
11/30/2024	4.3	Continued factual and legal analysis; researched key legal issues and evaluated litigation strategy.
1/13/2025	4.9	Evaluated litigation strategy, discovery issues, factual development, and next steps in prosecution of the action.
3/7/2025	3.6	Reviewed case status; analyzed legal theories and strategic issues affecting prosecution and potential resolution.
9/9/2025	1.6	Evaluated settlement posture and legal issues in anticipation of final resolution.
TOTAL	18.5	

DIEGO AVILES

Hourly Rate: \$850.00

Date	Hours	Standardized Billing Description
08/14/2025	3.5	Reviewed case file, case transfer materials, and procedural history.
08/15/2025	0.8	Reviewed client personnel file and related case materials.
08/15/2025	1.2	Reviewed court deadlines and applicable statutes of limitations.
08/26/2025	0.8	Reviewed litigation costs incurred to date for settlement and fee application purposes.
08/26/2025	1.3	Reviewed memorandum of understanding and procedural status.
08/30/2025	0.7	Reviewed mediation brief and analyzed asserted claims.
09/08/2025	1.0	Reviewed notice of settlement and conformed materials to settlement agreement.
09/15/2025	0.3	Conferenced with client regarding settlement process and case status.
09/29/2025	1.2	Reviewed final settlement agreement.
10/10/2025	0.9	Reviewed Notice of Related Case and analyzed whether responsive filing was necessary.
10/10/2025	1.2	Reviewed case file, case transfer materials, and procedural history.
10/27/2025	0.2	Corresponded with client regarding case status.
10/27/2025	0.2	Reviewed joint status report.
10/30/2025	0.2	Reviewed Court order vacating status conference.
01/21/2026	0.7	Reviewed approval requirements and declaration in support of settlement approval.
02/08/2026	0.6	Reviewed and revised declaration in support of approval.
02/19/2026	0.3	Reviewed and revised joint status conference statement.
02/20/2026	0.2	Reviewed Defendant's non-opposition to motion for approval.
02/25/2026	0.2	Reviewed Court order continuing status conference.
03/12/2026	0.4	Reviewed lien filed in related PAGA action.
03/12/2026	1.7	Reviewed lien filed in related PAGA action.
03/13/2026	0.4	Reviewed settlement agreement requirement to dismiss related PAGA action without prejudice.
03/15/2026	1.4	Researched class representative fiduciary duties and lien issues.
03/18/2026	0.5	Reviewed and revised class notice.
04/02/2026	0.2	Reviewed Defendant's change of address notice.
04/06/2026	0.3	Corresponded with lien holder regarding lien status.
04/07/2026	0.3	Conferenced with opposing counsel regarding lien and status update.
04/08/2026	0.2	Reviewed and revised joint status conference statement.
04/10/2026	0.7	Reviewed and revised request for dismissal of related PAGA action without prejudice.
04/13/2026	0.2	Corresponded with co-counsel regarding dismissal update.
TOTAL	21.8	

HARRY ERGANYAN

Hourly Rate: \$650.00

Date	Hours	Standardized Billing Description
08/15/2025		2.2 Analysis of personnel file and theories.
08/17/2025	1.3	1.3 Searching for and analyzing potentially related/overlapping matters
08/18/2025	1.0	1.0 Discussions with team regarding case strategy moving forward.
09/19/2025	0.9	0.9 Review of long-form and FAC
01/26/2026	0.3	0.3 Reviewing notice of related case
03/15/2026	0.9	0.9 Researching Plaintiff duties and impact of liens
04/07/2026	0.2	0.2 Review Joint Report
04/07/2026	0.5	0.5 Discussion with team regarding the notice of lien.
04/08/2026	0.3	0.3 Discussion with team regarding the notice of lien
04/08/2026	0.4	0.4 Review draft request for dismissal
06/08/2026	0.5	0.5 Discussion with team regarding the MFA and lien
TOTAL	8.5	

MARIAM NAZARETYAN

Hourly Rate: \$650.00

Date	Hours	Standardized Billing Description
08/14/2025	2.0	Reviewed case materials; analyzed factual allegations, claims, and legal issues.
08/18/2025	0.9	Conferred with litigation team regarding case strategy and settlement issues.
08/26/2025	3.5	Reviewed and analyzed draft long-form settlement agreement.
08/26/2025	0.3	Corresponded with litigation team regarding revisions to long-form settlement agreement.
08/26/2025	0.3	Coordinated internally to obtain information for revisions to long-form settlement agreement.
09/08/2025	0.3	Attempted communications with client regarding settlement.
09/11/2025	1.0	Conferenced with client regarding settlement terms and status.
09/19/2025	3.0	Reviewed revisions to long-form settlement agreement; analyzed draft stipulation and First Amended Complaint.
09/19/2025	0.3	Corresponded with co-counsel regarding settlement agreement, stipulation, and First Amended Complaint.
09/25/2025	1.5	Reviewed revisions to stipulation and First Amended Complaint.
09/25/2025	0.3	Corresponded with co-counsel regarding settlement documents.
09/29/2025	0.3	Corresponded with litigation team regarding revisions to long-form settlement agreement.
09/30/2025	0.5	Conferenced with client regarding settlement.
10/01/2025	0.3	Corresponded with litigation team regarding long-form settlement agreement.
10/01/2025	0.3	Corresponded with co-counsel regarding long-form settlement agreement.
01/20/2026	0.3	Coordinated calendaring of court deadlines and internal reminders.
01/26/2026	0.3	Corresponded with litigation team regarding filed Notice of Related Cases and next steps.
01/26/2026	0.5	Reviewed filed Notice of Related Cases.
01/29/2026	0.3	Conferred with litigation team regarding next litigation steps.
02/10/2026	0.3	Corresponded with settlement team regarding case administration.
02/18/2026	0.3	Corresponded with settlement team regarding case administration.
02/20/2026	0.5	Reviewed Defendant's non-opposition and conferred with litigation team.
03/09/2026	0.3	Coordinated preservation of filed documents.
03/09/2026	0.5	Reviewed Court's Preliminary Approval Order.
03/09/2026	0.3	Corresponded with litigation team regarding dismissal of related Los Angeles action.
03/11/2026	0.3	Corresponded with settlement team regarding case administration.
03/12/2026	0.5	Conferred with litigation team regarding Notice of Lien.
04/02/2026	0.3	Coordinated document management and service list updates.
04/06/2026	0.3	Corresponded with Department of Child Support Services regarding lien.
04/06/2026	0.3	Corresponded with opposing counsel regarding lien issues.
04/07/2026	0.5	Conferred with litigation team regarding Notice of Lien.
04/07/2026	0.4	Corresponded with opposing counsel regarding lien issues.
04/07/2026	0.5	Conferenced with Department of Child Support Services regarding lien.
04/07/2026	0.3	Conferenced with opposing counsel regarding lien issues.
04/07/2026	0.5	Drafted joint status report regarding lien.
04/08/2026	0.3	Corresponded with Department of Child Support Services regarding lien.
04/08/2026	0.5	Conferenced with Department of Child Support Services regarding lien.
04/08/2026	0.6	Corresponded with opposing counsel regarding lien issues.
04/08/2026	0.4	Reviewed opposing counsel's revisions to joint report; revised report and corresponded regarding same.
04/08/2026	1.0	Drafted dismissal of related Los Angeles action.
04/08/2026	0.3	Coordinated preservation of filed documents.
04/08/2026	0.3	Conferred with litigation team regarding Notice of Lien.
04/10/2026	0.3	Finalized dismissal request and coordinated filing.
04/14/2026	0.3	Reviewed court docket regarding pending dismissal request.
04/17/2026	0.3	Reviewed court docket regarding pending dismissal request.
04/21/2026	0.3	Reviewed entered dismissal order; coordinated document management and calendaring updates.
05/04/2026	0.4	Corresponded with settlement team regarding case administration.
05/28/2026	0.3	Coordinated calendaring of court deadlines and internal reminders.
06/08/2026	0.3	Corresponded with settlement team regarding Motion for Final Approval.
06/08/2026	0.5	Conferred with litigation team regarding Motion for Final Approval and Notice of Lien.
TOTAL	28.4	

LUCY H. NGUYEN*Hourly Rate: \$600.00*

Date	Hours	Standardized Billing Description
06/16/2026	1.2	Reviewed settlement file, Preliminary Approval Order, and Court's tentative ruling; analyzed requirements for Motion for Final Approval and fee application.
06/17/2026	1.5	Reviewed and revised Motion for Final Approval, supporting declarations, and proposed order; analyzed settlement terms and supporting documentation.
06/18/2026	1.4	Reviewed and reconciled litigation costs; analyzed recoverable costs; prepared cost summary and supporting calculations for fee application.
06/19/2026	1.8	Reviewed attorneys' billing records; prepared lodestar analysis; coordinated with litigation team regarding supporting documentation for fee application.
06/22/2026	2.1	Reviewed and revised Motion for Final Approval materials; coordinated with co-counsel regarding fee application, declarations, and supporting exhibits.
06/23/2026	2.4	Prepared and revised John Yslas declaration; reviewed billing records, litigation costs, and lodestar materials; coordinated collection of WLF billing records.
06/24/2026	3.2	Prepared for compliance hearing; reviewed Court orders and hearing materials; coordinated with co-counsel and litigation team regarding outstanding lien issue, attorneys' fees, billing records, and supporting exhibits; finalized WLF lodestar and billing summaries.
Projected through MFA filing	2.0	Final review and revisions to Motion for Final Approval, attorneys' fee application, supporting declarations, billing exhibits, and filing coordination.
TOTAL	15.6	

WILSHIRE LAW FIRM COST SUMMARY

Recoverable litigation costs after deductions

Description	Amount
Gross Costs Incurred	\$3,242.95
Less: Thomson Reuters/Westlaw Legal Research	(\$545.10)
Less: Postage	(\$24.76)
Recoverable Litigation Costs	\$2,673.09

LEGAL RESEARCH DEDUCTIONS

Thomson Reuters/Westlaw charges excluded from recoverable costs

Date	Vendor	Amount
11/05/2024	Thomson Reuters/Westlaw	\$140.72
12/04/2024	Thomson Reuters/Westlaw	\$86.79
05/05/2025	Thomson Reuters/Westlaw	\$288.00
06/04/2025	Thomson Reuters/Westlaw	\$29.59
TOTAL		\$545.10

POSTAGE DEDUCTIONS

Postage charges excluded from recoverable costs

Date	Expense Type	Amount
10/17/2024	Postage	\$8.16
10/17/2024	Postage	\$8.16
11/07/2024	Postage	\$8.44
TOTAL		\$24.76