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

DARRIN CRAWFORD, individually, and on
behalf of all others similarly situated,

Plaintiff,

vs.

DOUBLE J ENTERPRISES, INC., a California
corporation; and DOES 1 through 10, inclusive,

Defendants.

Case No.: 2024CUOE022910

*[Assigned for All Purposes to the Hon.
Charmaine H. Buehner, Dept. 44]*

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

Final Approval Hearing:

Date: August 20, 2026

Time: 1:30 p.m.

Dept.: 44

Action Filed: March 28, 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 Plaintiff Darrin Crawford (“Plaintiff”). I have personal knowledge of the facts set forth in this declaration and could and would competently testify to them under oath if called as a witness.

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

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

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

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

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

7. Upon graduating from law school in 1996, I worked for a boutique law firm practicing general litigation which included employment law matters. Since 2000 (that is, the last 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 Private Attorneys General Act, or “PAGA”), including in the international law firms of Morgan,

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

7 8. In late June 2022 I left Seyfarth Shaw LLP and joined my current firm, Wilshire
8 Law Firm, PLC, to represent plaintiff employees. I have been and am handling many wage and
9 hour class and representative actions litigating such matters on behalf of plaintiff employees in
10 numerous Superior Courts and District Courts. From matters representing both plaintiffs and
11 defendants, I have successfully mediated the resolution of many wage and hour class, collective,
12 and representative actions. Just since starting to settle cases in late April 2023 I have already
13 successfully mediated matters in which I have been counsel or co-counsel resulting in **over \$275**
14 **million** in settlements and verdicts which are in the process of being finalized, and with numerous
15 upcoming mediations scheduled. In those and numerous other matters, I have managed and
16 assisted with the litigation and settlement of many wage and hour PAGA and class actions. In
17 those actions, I performed similar tasks as those performed in the course of prosecuting this
18 action. Indeed, I recently tried and prevailed in achieving a jury verdict in a certified wage and
19 hour class action in the matter of *Aguilar-Flores v. Javier's – CC LLC*, Los Angeles County
20 Superior Court, Case No. 19STCV36438 (settled after verdict).

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

28 10. I have also published numerous blogs on labor and employment issues including

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

7 11. Diego Aviles is a Junior Partner at WLF. Mr. Aviles graduated from the University
8 of California, Irvine, with a Bachelor of Arts in Political Science as well as a Bachelor of Arts in
9 Criminology, Law, and Society, and received his Juris Doctor from the Santa Clara University
10 School of Law in 2015. During law school, Mr. Aviles was President for the Santa Clara
11 Employment Law Society, Board Member of the Honors Moot Court, and President of the Santa
12 Clara University La Raza Chapter. He clerked for the Equal Employment Opportunity
13 Commission in San Francisco, California, and also worked with the Workers’ Rights Clinic in
14 San Jose, California, among other employment law firms. He was admitted to practice law in the
15 State of California in 2017. Since graduating from law school, he has focused his legal work
16 exclusively on employment matters, including wage-and-hour class action and PAGA
17 representative action litigation, and he has helped obtain dozens of settlements on behalf
18 California workers. He has been appointed Class Counsel numerous times in California and most
19 recently achieved a published California Appellate opinion in the matter of *Alberto v. Cambrian*
20 *Homecare, et al.*, 91 Cal.App.5th 482 regarding employment arbitration agreements. He has also
21 been a member of the California Employment Lawyers Association (CELA) since at least 2019.
22 Mr. Aviles currently bills at an hourly rate of \$850.00.

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

1 13. Mariam Nazaretyan is an Associate Attorney at WLF. She was admitted to practice
2 law in the State of California in 2021. Ms. Nazaretyan graduated from Loyola Marymount
3 University with a Bachelor of Arts in Political Science. She received her Juris Doctor from
4 Southwestern Law School. During law school, she was a student editor for the Journal of
5 International Media and Entertainment Law and secretary of the Student Bar Association. Since
6 graduating, Ms. Nazaretyan's practice has been focused on international humanitarian law and
7 employment law. Ms. Nazaretyan currently bills at an hourly rate of \$650.00.

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

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

1 rates of \$1,300 per hour reasonable for plaintiff's 32-year attorney and \$1,000 per hour reasonable
2 for a 14-year attorney. The multiplier here is even more compelling given Class Counsel
3 represents approximately 85 Class Members.

4 16. WLF has been approved as class counsel by courts in California. *See, e.g., Matthew*
5 *Veliz v. DrinkPak, LLC*, Los Angeles County Superior Court, Case No. 22STCV37384, *Ismael*
6 *Villegas-Sanchez v. COE Orchard Equipment, Inc.*, Sutter County Superior Court, Case No.
7 CVCS22-0002261; *Jessica Bronsal v. PTI Technologies Inc.*, Ventura County Superior Court,
8 Case No. 202200570361CUOE; *Miguel A. Vigil Ruiz v. The De Ruosi Group, LLC*, San Joaquin
9 County Superior Court, Case No. STK-CV-UOE-2022-8780; *Gutierrez v. Top Drawer Merch,*
10 *LLC et al*, Los Angeles County Superior Court, Case No. 23STCV04299; *Wing v. Road*
11 *Machinery, LLC et al*, Kern County Superior Court, Case No. BCV-22-102896; *Hernandez v.*
12 *SGPS Showrig Los Angeles, Inc.*, Los Angeles County Superior Court, Case No. 22STCV28155;
13 *Azevedo v. Tulare Nursing & Rehabilitation Hospital, Inc.*, Tulare County Superior Court, Case
14 No. VCU293325; *Haser v. Universal Chain of California, Inc.*, Sacramento County Superior
15 Court, Case No. 34-2022-00332268; *Caldera v. Performance Online, Inc. et al*, Riverside County
16 Superior Court, Case No. CVRI2306013; *Goosby v. CiminoCare, Inc.*, Sacramento County
17 Superior Court, Case No. 34-2022-00329033; *Rooks v. Hot Cakes Restaurant Group, Inc.*, San
18 Joaquin County Superior Court, Case No. STK-CV-UOE-2022-11056; *Garcia v. Compassionate*
19 *Heart*, Orange County Superior Court, Case No. 30-2022-01294409-CU-OE-CXC; *Parra v.*
20 *Citrus Valley Management Services, Inc.*, Riverside County Superior Court, Case No.
21 CVRI2301768; *Torres v. HomeShield Pest Control Inc.*, Placer County Superior Court, Case No.
22 S-CV-0049525; *Cabrera v. Creekside Auto Group*, Santa Clara County Superior Court, Case No.
23 23CV415661; *Simpson v. Arcos*, Riverside Superior Court, Case No. CVRI2303337; *Payne v.*
24 *Planned Parenthood: Shasta-Diablo, Inc.*, San Francisco County Superior Court, Case No. CGC-
25 23-607359. The total hours expended on this action are reasonable and in line with those
26 expended in comparable cases.

27 17. In cases in which WLF has been approved as class counsel, California courts have
28 approved rates similar to those requested by WLF in the instant case. *See, e.g., Rodolfo Ponce v.*

1 *Youbar, Inc.*, Los Angeles County Superior Court, Case No. 22STCV37519 (WLF's rates were
2 approved as follows: John G. Yslas (\$1,500.00), Samantha A. Smith (\$1,000.00), Jeffrey C. Bils
3 (\$850.00), Aram Boyadjian (\$600.00), Lisa B. Iturriaga (\$550.00), and Andrew Sandoval
4 (\$500.00)); *Sabrina N. Batres v. Wish Automotive II, Inc. dba Infiniti of Van Nuys*, Los Angeles
5 County Superior Court, Case No. 23STCV19968 (WLF's rates were approved as follows: John
6 G. Yslas (\$1,500.00), Jeffrey C. Bils (\$850.00), Aram Boyadjian (\$600.00), Lisa B. Iturriaga
7 (\$550.00), and Andrew Sandoval (\$500.00)); *Diandrea Correa et al. v. CareMeridian, LLC, et.*
8 *al.*, Los Angeles County Superior Court, Case No. 23STCV10707 (WLF's rates were approved
9 as follows: John G. Yslas (\$1,500.00), Samantha A. Smith (\$1,000.00), Jeffrey C. Bils (\$850.00),
10 Fawn F. Bekam (\$800.00), Diego Aviles (\$800.00), Aram Boyadjian (\$600.00), Harry Erganyan
11 (\$600.00), Lisa B. Iturriaga (\$550.00), and Andrew Sandoval (\$500.00)); *Carlos Santos*
12 *Granados v. Sunny Hills Management Co., Inc.*, Los Angeles County Superior Court, Case No.
13 23STCV02109 (WLF's rates were approved as follows: John G. Yslas (\$1,500.00), Samantha A.
14 Smith (\$1,000.00), Jeffrey C. Bils (\$850.00), Diego Aviles (\$750.00), Courtney M. Miller
15 (\$650.00), Aram Boyadjian (\$600.00), Harry Erganyan (\$600.00), Mariam Nazaretyan (\$550.00),
16 Lisa B. Iturriaga (\$550.00), and Andrew Sandoval (\$500.00)); *Kayla Kurges v. Khanna*
17 *Enterprises, Ltd. dba Sheraton Agoura Hills*, Los Angeles County Superior Court, Case No.
18 24STCV01590 (WLF's rates were approved as follows: John G. Yslas (\$1,500.00), Jeffrey C.
19 Bils (\$850.00), Aram Boyadjian (\$600.00), Lisa B. Iturriaga (\$550.00), and Andrew Sandoval
20 (\$500.00)); *Thora Magney et al. v. Levi Strauss & Co., et al.*, Los Angeles County Superior Court,
21 Case No. 24STCV02320 (WLF's rates were approved as follows: John G. Yslas (\$1,500.00),
22 Samantha A. Smith (\$1,000.00), Jeffrey C. Bils (\$850.00), Fawn F. Bekam (\$800.00), Aram
23 Boyadjian (\$600.00), Lisa B. Iturriaga (\$550.00), and Andrew Sandoval (\$500.00)); *Armando*
24 *Muniz, et al. v. Lot LLC, dba Lot Management LLC (fka Red Cow, Inc.) et. al.*, Los Angeles
25 County Superior Court, Case No. 22STCV32901 (WLF's rates were approved as follows: John
26 G. Yslas (\$1,500.00), Samantha A. Smith (\$1,000.00), Jeffrey C. Bils (\$850.00), Diego Aviles
27 (\$750.00), Aram Boyadjian (\$600.00), Harry Erganyan (\$600.00), Mariam Nazaretyan (\$550.00),
28 Lisa B. Iturriaga (\$550.00), and Andrew Sandoval (\$500.00)); *George Munoz v. Century West*,

1 *LLC dba Century West BMW*, Los Angeles County Superior Court, Case No. 23STCV04247
2 (WLF's rates were approved as follows: John G. Yslas (\$1,500.00), Samantha A. Smith
3 (\$1,000.00), Jeffrey C. Bils (\$850.00), Aram Boyadjian (\$600.00), Lisa B. Iturriaga (\$550.00),
4 and Andrew Sandoval (\$500.00)); *Ivan S. Martinez II et. al. v. The Haar Company, et. al.*, Los
5 Angeles County Superior Court, Case No. 23STCV21651 (WLF's rates were approved as follows:
6 John G. Yslas (\$1,500.00), Samantha A. Smith (\$1,000.00), Jeffrey C. Bils (\$850.00), Diego
7 Aviles (\$750.00), Aram Boyadjian (\$600.00), Harry Erganyan (\$600.00), Mariam Nazaretyan
8 (\$550.00), Lisa B. Iturriaga (\$550.00), and Andrew Sandoval (\$500.00)).

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

16 a. The report provides rate information filtered by geographic market,
17 practice type, and timekeeper role. Page 33 of the report reflects rates drawn from 565 partners
18 and 518 associates practicing in Los Angeles. In that dataset, the third-quartile hourly rate is
19 \$1,365 for partners and \$982 for associates. These figures confirm that Los Angeles is a high-
20 rate legal market and that experienced litigation partners routinely bill in excess of \$1,300 per
21 hour based on rates actually paid by clients in 2024. The Real Rate Report further shows that in
22 the San Diego market, partners with 21 or more years of experience command third-quartile
23 billing rates of approximately \$1,334 per hour, confirming that highly experienced litigators in
24 major Southern California markets routinely bill at the upper end of the rate spectrum.

25 b. The 2025 Real Rate Report's practice-area-specific data further supports
26 this conclusion. Page 81 provides third-quartile rates for the detailed practice category
27 "Employment and Labor: Other Litigation," which is directly analogous to the type of work
28 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 the specialized employment litigation market, partners regularly bill well above \$1,200 per hour based on rates actually charged to clients. When this practice-specific benchmark is considered together with the broader regional market data, it confirms that WLF's hourly rate for highly experienced counsel in a representative employment action falls within the upper range of prevailing market rates rather than outside it.

c. The Real Rate Report does not provide 1st quartile or 4th quartile rates, presumably to provide a sense of the average attorney billing rates. Importantly, the third quartile represents the point below which 75% of rates fall; it is not a cap on reasonable rates. By definition, a substantial portion of partners in the relevant benchmark market routinely bill above that level, particularly those with extensive experience, specialized expertise, or leadership roles in complex litigation. Courts evaluating fee requests recognize that leading counsel in complex or representative actions may reasonably bill above median or third-quartile benchmarks where their experience, results obtained, and responsibilities justify higher rates. We firmly believe WLF belongs in the 4th quartile of attorney billing rates in Southern California. As previously discussed, WLF is a nationally recognized employment litigation firm that has been named one of the nation's *Best Law Firms* by U.S. News & World Report and Best Lawyers since 2020, and its attorneys regularly litigate complex wage-and-hour class and representative actions throughout California. I am a UCLA School of Law graduate with nearly three decades of experience litigating labor and employment matters—including as a partner and holding leadership roles at major international law firms when I was on the defense side for 26 years, as well as substantial recent class and representative action results including being one of the few attorneys in the state of California to try a wage and hour class action to verdict (and prevail), and achieving results exceeding \$225 million in just the last three years since starting to settle matters as a plaintiffs' attorney. My credentials and experience place my \$1,500 hourly rate within the highest tier of Southern California employment litigators, consistent with rates that would fall within the fourth quartile beyond those reported in the Real Rate Report.

19. WLF has performed significant work and incurred litigation costs in prosecuting

1 this matter with no guarantee of any payment. The efforts expended by Plaintiff's counsel to
2 achieve this result include, but are not limited to, the following:

- 3 a. the investigation of the matter, including meeting with Plaintiff, reviewing
4 Defendant's policies, and requesting and reviewing Plaintiff's time and pay
5 records, personnel file, and exploring the corporate structure of Defendant;
- 6 b. filing the Action;
- 7 c. attending status conferences and meeting and conferring with Defendant
8 regarding the case;
- 9 d. meeting and conferring with Defendant regarding mediation, exchange of
10 informal discovery beforehand, and negotiating with opposing counsel
11 regarding the parameters thereof;
- 12 e. selecting a mediator and mediation date;
- 13 f. working with opposing counsel for the receipt of a representative sampling and
14 analyzing the same with the aid of an expert consultant and Plaintiff to perform
15 analyses of liability and exposure prior to attendance of the mediation in this
16 matter;
- 17 g. reviewing policy documents from Defendant and researching applicable
18 defenses;
- 19 h. preparing the mediation brief and damages model for use at mediation;
- 20 i. attending the mediation;
- 21 j. communicating with Plaintiff who requested updates or other information
22 regarding this matter;
- 23 k. negotiating, finalizing and fully executing the settlement agreement;
- 24 l. preparing and filing the Motion for Preliminary Approval and supporting
25 documents;
- 26 m. attending the hearing on Motion for Preliminary Approval;
- 27 n. preparing and filing supplemental papers related to the Motion for Preliminary
28 Approval;

- o. communicating with any Class Members who sought additional information regarding the settlement, including answering questions regarding the settlement and obtaining updated addresses from Class Members for purposes of receiving the Class Notice and administering the settlement checks; and
- p. preparing the instant Motion for Final Approval and supporting documents.

20. WLF's current lodestar reflects the efficiencies achieved by attorneys experienced in this field with **137.6** hours of work resulting in **\$101,750.00** in fees. A true and correct copy of Class Counsel's detailed billing records in this matter is attached hereto as **Exhibit 2**. 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	5.9	\$1,500.00	\$8,850.00
Courtney M. Miller	15.1	\$700.00	\$10,570.00
Harry Erganyan	21.6	\$650.00	\$14,040.00
Diego Aviles	32.7	\$850.00	\$27,795.00
Mariam Nazaretyan	62.3	\$650.00	\$40,495.00
TOTAL	137.6		\$101,750.00

21. This amount surpasses the requested fee award of \$75,055.00, resulting in a negative multiplier. Class Counsel's lodestar does not include the time Class Counsel will spend at the Final Approval Hearing and assisting the Settlement Administrator following final approval. Class Counsel dedicated significant resources to this case by dividing the tasks required according to skill level. The hours expended by each attorney were not duplicative and reflect the extensive investigation and analysis that was required to achieve this Settlement. This time could have been spent on other potentially lucrative cases. Class Counsel's lodestar reflects the efficiencies achieved by attorneys experienced in this field. Moreover, Class Counsel has singularly assumed the risk and costs of litigation purely on a contingency basis. And, while

1 Plaintiff is confident in the merits of his claims, a legitimate controversy exists as to each cause
2 of action, posing an actual risk that Plaintiff may not succeed at class certification and/or trial.
3 Any of these obstacles could have prevented recovery completely, meaning Class Counsel would
4 have been left with no compensation for all the time and money invested in litigating this case.
5 Despite these risks, Class Counsel took this case on a contingency basis so that Class Members
6 (a particularly vulnerable group of hourly paid workers) could be compensated for their unpaid
7 wages. Consequently, Class Counsel was precluded from focusing on, or taking on, other cases
8 which could have resulted in a larger, and less risky, monetary gain.

9 22. In litigation costs, WLF has spent \$17,361.15 on items such as filing fees, service
10 fees, mediation fees, and expert consultant fees and will incur an additional \$60.00 for the filing
11 fee to file this motion. Plaintiff therefore seeks to recover \$17,421.15 in total costs. A true and
12 correct copy of WLF's cost reports in this matter is attached hereto as **Exhibit 3**. Since Class
13 Counsel's costs did not reach the maximum of \$20,000.00, the remaining \$2,578.85 will revert
14 to and increase the Net Settlement Amount.

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

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

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

21 Executed on July 29, 2026 at Los Angeles, California.

22
23 

24 John G. Yslas
25
26
27
28

EXHIBIT 1



ELM Solutions

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analysis of law firm rates,
trends, and practices

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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.

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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

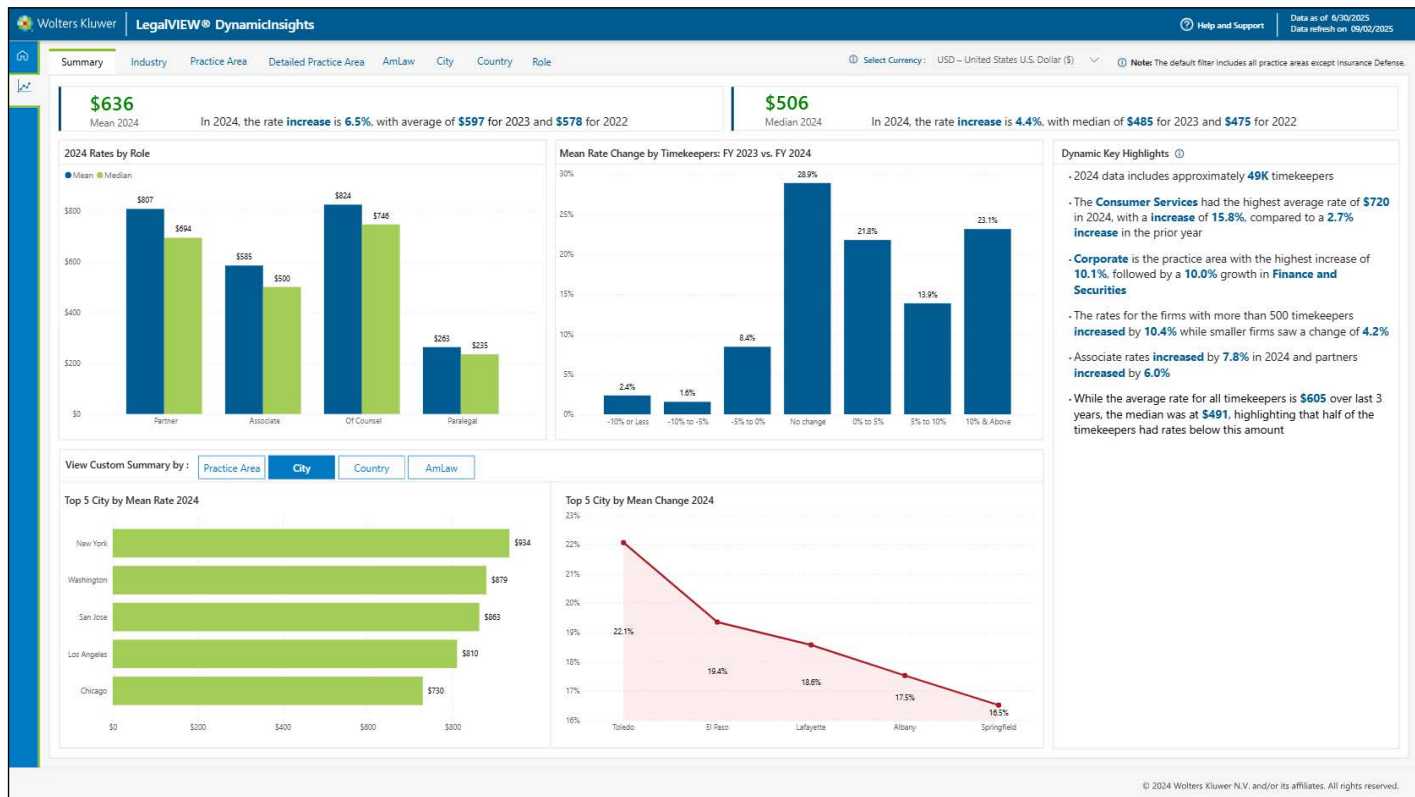
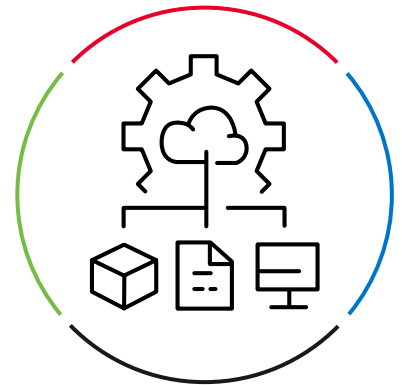


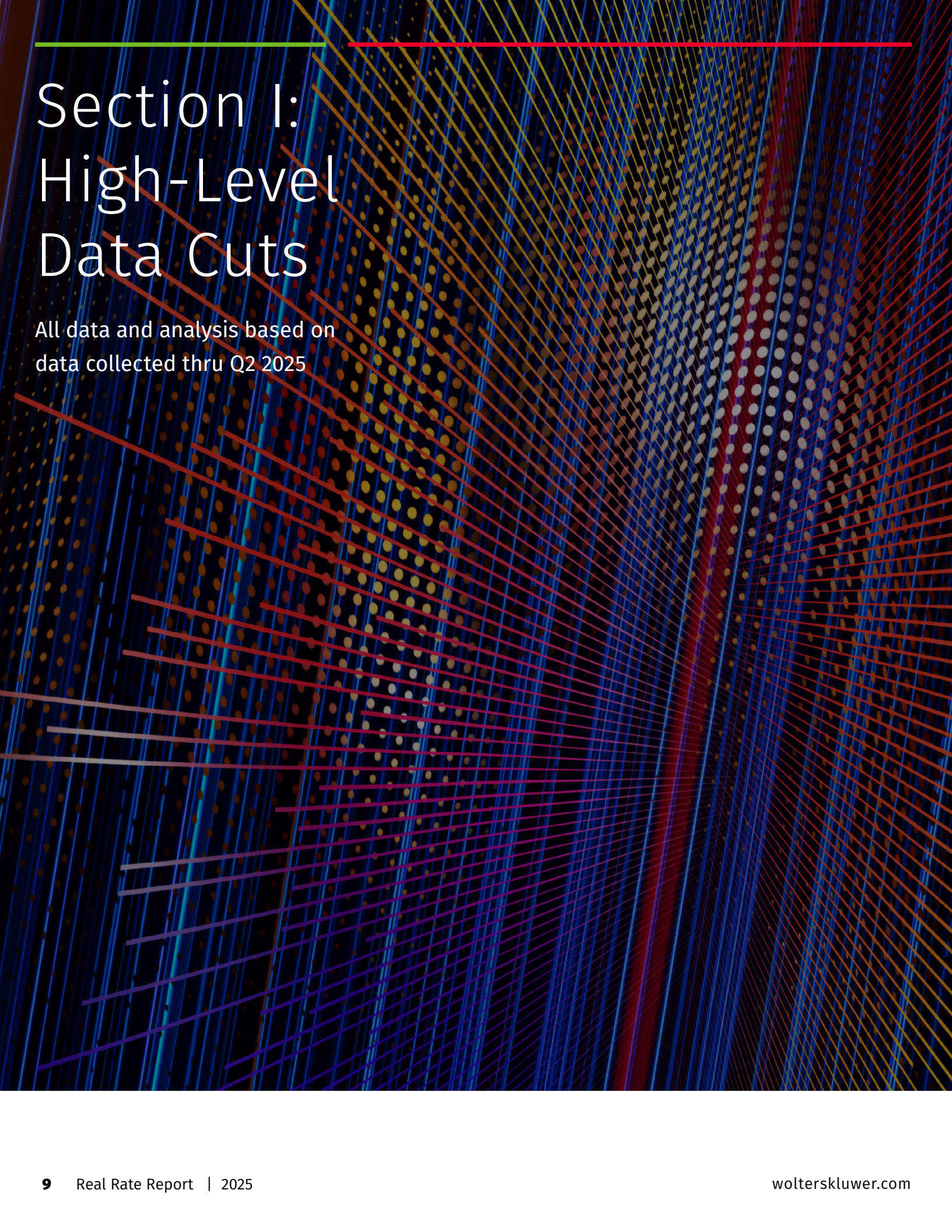
LegalVIEW® DynamicInsights

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 Role

2025 Real Rates for Associate and Partner

Trend Analysis - Mean

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

Section I: High-Level Data Cuts

Cities
By Years of Experience

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



Section II: Industry Analysis

All data and analysis based on
data collected thru Q2 2025

Section II: Industry Analysis

Consumer Services

By Detailed Practice Area and
Matter Type

2025 - Real Rates for Associate and Partner

Trend Analysis - Mean

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

EXHIBIT 2

Crawford v. Double J Enterprises, Inc.

Detailed Billing

John G. Yslas:

Date Completed	Task Completed	Attorney	Hours	Hourly Rate	Fees
6/1/2025	Research and analysis and factual investigation related to mediation and potential litigation and evaluate discovery issues and overall approach to the case	JY	5.9	\$1,500.00	\$8,850.00
TOTALS:			5.9		\$8,850.00

Courtney M. Miller:

Date Completed	Task Completed	Attorney	Hours	Hourly Rate	Fees
2/6/2026	Draft Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement; Memorandum of Points and Authorities	CM	3.0	\$700.00	\$2,100.00
2/6/2026	Draft Declaration of John G. Yslas in Support of Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement	CM	1.0	\$700.00	\$700.00
2/6/2026	Draft and Order Granting the Motion for Preliminary	CM	0.5	\$700.00	\$350.00

	Approval of Class Action and PAGA Settlement				
2/5/2026	Draft Plaintiff's Declaration in Support of Plaintiff's Motion for Final Approval of Class Action and PAGA Settlement	CM	0.5	\$700.00	\$350.00
3/4/2026	Review Tentative Ruling for Motion for Preliminary Approval of Class Action and PAGA Settlement	CM	0.2	\$700.00	\$140.00
3/4/2026	Attend Hearing on Motion for Preliminary Approval of Class Action and PAGA Settlement and draft Hearing Memo	CM	0.7	\$700.00	\$490.00
3/16/2026	Draft Notice of Ruling for Hearing on Motion for Preliminary Approval of Class Action and PAGA Settlement	CM	0.3	\$700.00	\$210.00
3/27/2026	Call with Client re Settlement	CM	0.5	\$700.00	\$350.00
4/20/2026	Draft Revised Proposed Order for Motion for Preliminary Approval of Class Action and PAGA Settlement	CM	0.2	\$700.00	\$140.00
4/20/2026	Draft Revised Class Notice	CM	0.2	\$700.00	\$140.00
4/20/2026	Draft Amendment to Settlement Agreement	CM	0.5	\$700.00	\$350.00
4/22/2026	Email communication with Defense Counsel re the Amendment to the Settlement Agreement, Revised Class Notice and Revised Proposed Order	CM	0.3	\$700.00	\$210.00
4/23/2026	Draft Attorney Declaration in Support of Hearing on	CM	0.4	\$700.00	\$280.00

	Motion for Preliminary Approval of Class Action and PAGA Settlement				
5/7/2026	Review Notice of Rejection from Court	CM	0.1	\$700.00	\$70.00
5/8/2026	Draft Further Revised Proposed Order for Motion for Preliminary Approval of Class Action and PAGA Settlement	CM	0.2	\$700.00	\$140.00
5/29/2026	Email correspondence from Administrator identifying the case manager	CM	0.1	\$700.00	\$70.00
6/2/2026	Email correspondence between Administrator and Defense Counsel re status of class data	CM	0.1	\$700.00	\$70.00
6/4/2026	Email correspondence to Administrator and Defense Counsel re the timeline	CM	0.2	\$700.00	\$140.00
6/9/2026	Email correspondence from Administrator confirming receipt of the Class Data	CM	0.1	\$700.00	\$70.00
6/10/2026	Email correspondence from Administrator re discrepancies and potential inconsistencies in the Class Data that need resolution	CM	0.2	\$700.00	\$140.00
6/12/2026	Email correspondence from Administrator confirming resolution of discrepancies Class Data; Confirmation by Counsel of the draft Class Notice and Preliminary Calculations	CM	0.3	\$700.00	\$210.00

6/15/2026	Email correspondence from Administrator confirming Class Notice mailed out	CM	0.1	\$700.00	\$70.00
7/27/2026	Email correspondence with attorneys regarding their hours for this matter	CM	0.3	\$700.00	\$210.00
7/27/2026	Draft Proposed Judgment and Order Granting the Motion for Final Approval of Class Action and PAGA Settlement	CM	0.5	\$700.00	\$350.00
7/27/206	Draft Plaintiff's Declaration in Support of Plaintiff's Motion for Final Approval of Class Action and PAGA Settlement	CM	0.5	\$700.00	\$350.00
7/28/2026	Email correspondence with Administrator re Declaration for Motion for Final Approval of Class Action and PAGA Settlement; Review of draft Declaration	CM	0.3	\$700.00	\$210.00
7/28/2026	Draft Plaintiff's Motion for Final Approval of Class Action and PAGA Settlement; Memorandum of Points and Authorities	CM	3.0	\$700.00	\$2,100.00
7/28/2026	Draft Declaration of John G. Yslas in Support of Plaintiff's Motion for Final Approval of Class Action and PAGA Settlement	CM	0.7	\$700.00	\$490.00

7/28/2026	Email correspondence to Defense Counsel re Motion Drafts	CM	0.1	\$700.00	\$70.00
TOTALS:			15.1		\$10,570.00

Harry Erganyan:

Date Completed	Task Completed	Attorney	Hours	Hourly Rate	Fees
04/20/2024	Review of case file and deadlines. Internal strategizing with team and reaching out to OC.	HE	2.5	\$650.00	\$1,625.00
05/07/2024	Analyzing arbitration agreement.	HE	1.8	\$650.00	\$1,170.00
05/23/2024	Review of documents produced by OC via Dropbox and correspondence with OC.	HE	2.5	\$650.00	\$1,625.00
05/24/2024	Review and redline edits to draft stipulation to extend time to respond and sending to OC.	HE	1.0	\$650.00	\$650.00
08/06/2024	Researching Defendant's organization structure.	HE	1.1	\$650.00	\$715.00
08/29/2024	Searching for potentially related/overlapping matters.	HE	1.0	\$650.00	\$650.00
12/3/2024	Case Management Conference prep and appearance.	HE	2.0	\$650.00	\$1,300.00
06/06/2025	Auditing and reviewing Defendant's mediation production including data.	HE	3.5	\$650.00	\$2,275.00

06/20/2025	Continued review of Defendant's informal production of documents and data re mediation.	HE	2.5	\$650.00	\$1,625.00
06/25/2025	Strategizing and inputs re mediation and mediation brief.	HE	0.6	\$650.00	\$390.00
06/26/2025	Reviewing/editing mediation brief.	HE	2.2	\$650.00	\$1,430.00
06/27/2025	Final review of expert report and findings.	HE	0.9	\$650.00	\$585.00
TOTALS:			21.6		\$14,040.00

Diego Aviles:

Date Completed	Task Completed	Attorney	Hours	Hourly Rate	Fees
04/20/2024	Review of statutes of limitation	DA	0.5	\$850.00	\$425.00
04/20/2024	Review of case file, facts, and litigation strategy	DA	2	\$850.00	\$1,700.00
04/30/2024	Analysis of arbitration agreement and possible defenses	DA	0.7	\$850.00	\$595.00
05/13/2024	Review of Client communications re: work injuries	DA	0.3	\$850.00	\$255.00
05/14/2024	Teleconference with Client	DA	0.2	\$850.00	\$170.00
05/21/2024	Email correspondence with opposing counsel re: personnel file	DA	0.2	\$850.00	\$170.00

06/06/2024	Review of personnel file and paystubs for facial violations	DA	1.2	\$850.00	\$1,020.00
06/06/2024	Legal Research and analysis of enforceability of standing meal period waivers, on-call policy, and plaintiff schedules	DA	0.4	\$850.00	\$340.00
06/07/2024	Strategize on claims for PAGA notice and complaint	DA	0.5	\$850.00	\$425.00
06/07/2024	Research of Defendant's corporate structure, ownership, and finances	DA	1.3	\$850.00	\$1,105.00
06/10/2024	Teleconference with opposing counsel re: arbitration and mediation	DA	0.4	\$850.00	\$340.00
06/10/2024	Review of stipulation to extend responsive pleading deadline	DA	0.2	\$850.00	\$170.00
06/11/2024	Review and edits to LWDA Notice letter	DA	0.5	\$850.00	\$425.00
08/15/2024	Review and edits to First Amended Complaint	DA	0.8	\$850.00	\$680.00
09/06/2024	Review of Defendant's Case Management Statement	DA	0.2	\$850.00	\$170.00
09/23/2024	Review of Defendant's Confidentiality Agreement and application to arbitration agreement re: Alberto v. Cambrian Homes	DA	0.9	\$850.00	\$765.00

09/25/2024	Teleconference with opposing counsel re: arbitration and mediation	DA	0.4	\$850.00	\$340.00
09/25/2024	Analysis of Bob Holzer Automotive and correspondence with opposing counsel re: mediation	DA	0.6	\$850.00	\$510.00
10/31/2024	Strategize on issues related to Defendant's anticipated financial hardship issues	DA	0.2	\$850.00	\$170.00
11/05/2024	Review of correspondence from Defendant re: entity responsible for payroll	DA	0.3	\$850.00	\$255.00
12/10/2024	Review and edits to Plaintiff's Notice of Case Management Conference	DA	0.2	\$850.00	\$170.00
01/28/2025	Review of Defendant's Case Management Statement	DA	0.2	\$850.00	\$170.00
01/20/2025	Review and edits to joint case management statement	DA	0.3	\$850.00	\$255.00
02/03/2025	Review of mediator's calendar, fees, and availability to mediate on a class/PAGA basis	DA	0.4	\$850.00	\$340.00
02/04/2025	Review of mediator's invoice	DA	0.2	\$850.00	\$170.00
04/16/2025	Review and edits to Request for Dismissal of Bob Holzer Automotive, Inc.	DA	0.5	\$850.00	\$425.00
05/23/2025	Teleconference with client re representation and pending wage claims	DA	0.5	\$850.00	\$425.00
05/23/2025	Email correspondence to client re: representation	DA	0.2	\$850.00	\$170.00

05/29/2025	Email correspondence with mediator re: mediation date	DA	0.2	\$850.00	\$170.00
06/12/2025	Review of employee handbooks, job descriptions, and related entities of Defendant	DA	2.5	\$850.00	\$2,125.00
06/24/2025	Email correspondence with expert re: data production and analysis of claims re: regular rate	DA	0.4	\$850.00	\$340.00
06/26/2025	Review and edits to Plaintiff's mediation brief	DA	2.5	\$850.00	\$2,125.00
06/30/2025	Review of expert analysis and exemplars	DA	0.4	\$850.00	\$340.00
07/01/20225	Full-Day Mediation	DA	8.0	\$850.00	\$6,800.00
07/01/2025	Teleconference with client re: mediator's proposal	DA	0.4	\$850.00	\$340.00
07/02/2025	Correspondence with mediator re: settlement proposal	DA	0.2	\$850.00	\$170.00
07/03/2025	Review and edits to long-form settlement agreement	DA	0.9	\$850.00	\$765.00
07/11/2025	Review of edits to long-form settlement	DA	0.4	\$850.00	\$340.00
07/31/2025	Review of bids from third-party administrators	DA	0.3	\$850.00	\$255.00
07/31/2025	Review of invoice from financial expert	DA	0.2	\$850.00	\$170.00
11/04/2025	Review of Court minute order re: OSC Response	DA	0.4	\$850.00	\$340.00
11/12/2025	Prepare and attend CMC + preparation of hearing memo	DA	1.3	\$850.00	\$1,105.00
11/15/2025	Review of litigation costs to date	DA	0.3	\$850.00	\$255.00

TOTALS:			32.7		\$27,795.00
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Mariam Nazaretyan:

Date Completed	Task Completed	Attorney	Hours	Hourly Rate	Fees
04/30/24	Emails to opposing counsel.	MN	0.2	\$650.00	\$130.00
05/07/24	Call with client regarding the arbitration agreement presented by opposing counsel.	MN	1.0	\$650.00	\$650.00
05/21/24	Email to opposing counsel.	MN	0.1	\$650.00	\$65.00
06/05/24	Review of client's personnel file.	MN	0.8	\$650.00	\$520.00
06/10/24	Call with opposing counsel.	MN	0.3	\$650.00	\$195.00
06/10/24	Draft stipulation regarding Defendant's responsive pleading deadline.	MN	1.0	\$650.00	\$650.00
06/10/24	Email to opposing counsel regarding the stipulation.	MN	0.1	\$650.00	\$65.00
06/11/24	Draft letter to the LWDA.	MN	2.0	\$650.00	\$1,300.00
06/11/24	Email to staff to file the draft LWDA letter.	MN	0.1	\$650.00	\$65.00
06/18/24	Email to opposing counsel regarding the stipulation.	MN	0.1	\$650.00	\$65.00
06/19/24	Email to opposing counsel regarding the stipulation.	MN	0.1	\$650.00	\$65.00
06/19/24	Email to staff to file the stipulation.	MN	0.1	\$650.00	\$65.00

08/15/24	Draft first amended complaint in the class action.	MN	1.7	\$650.00	\$1,105.00
08/15/24	Email to staff to file the first amended complaint.	MN	0.1	\$650.00	\$65.00
09/06/24	Draft CM-110.	MN	0.5	\$650.00	\$325.00
09/06/24	Email to staff to file the CM-110.	MN	0.1	\$650.00	\$65.00
09/06/24	Email to opposing counsel.	MN	0.1	\$650.00	\$65.00
09/17/24	Email to opposing counsel.	MN	0.1	\$650.00	\$65.00
09/23/24	Court appearance at case management conference.	MN	0.9	\$650.00	\$585.00
09/23/24	Email to opposing counsel.	MN	0.1	\$650.00	\$65.00
09/24/24	Emails to opposing counsel.	MN	0.2	\$650.00	\$130.00
09/25/24	Call with opposing counsel.	MN	0.2	\$650.00	\$130.00
09/26/24	Draft stipulation regarding Defendant's responsive pleading deadline.	MN	1.0	\$650.00	\$650.00
09/26/24	Email to opposing counsel regarding the joint stipulation.	MN	0.1	\$650.00	\$65.00
09/26/24	Email to staff to file the joint stipulation	MN	0.1	\$650.00	\$65.00
11/1/24	Emails to opposing counsel regarding mediation.	MN	0.2	\$650.00	\$130.00
11/13/24	Email to opposing counsel regarding additional defendants.	MN	0.1	\$650.00	\$65.00
11/25/24	Draft CM-110.	MN	0.5	\$650.00	\$325.00
11/25/24	Email to staff to file the CM-110.	MN	0.1	\$650.00	\$65.00
12/10/24	Draft notice.	MN	0.4	\$650.00	\$260.00

12/10/24	Email to staff to file the notice.	MN	0.1	\$650.00	\$65.00
12/16/24	Email to opposing counsel regarding additional defendants.	MN	0.1	\$650.00	\$65.00
01/16/25	Email to opposing counsel regarding mediation	MN	0.1	\$650.00	\$65.00
01/20/25	Draft joint report.	MN	0.5	\$650.00	\$325.00
01/30/25	Call with opposing regarding mediation.	MN	0.3	\$650.00	\$195.00
02/03/25	Email to opposing counsel regarding mediation	MN	0.1	\$650.00	\$65.00
03/12/25	Draft pre-mediation discovery request.	MN	1.0	\$650.00	\$650.00
03/12/25	Email to opposing counsel regarding mediation	MN	0.1	\$650.00	\$65.00
04/16/25	Draft request to dismiss defendant and declaration.	MN	1.5	\$650.00	\$975.00
04/17/25	Email to staff to file the request.	MN	0.1	\$650.00	\$65.00
04/17/25	Draft joint report.	MN	0.5	\$650.00	\$325.00
04/17/25	Email to opposing counsel regarding the joint report.	MN	0.1	\$650.00	\$65.00
04/18/25	Email to staff to file the joint report.	MN	0.1	\$650.00	\$65.00
04/22/25	Draft declaration for OSC.	MN	1.0	\$650.00	\$650.00
04/28/25	Email to court regarding request for remote appearance.	MN	0.2	\$650.00	\$130.00
04/29/25	Court appearance at CMC and OSC.	MN	1.0	\$650.00	\$650.00
04/29/25	Draft appearance memo.	MN	0.3	\$650.00	\$195.00
05/06/25	Email to opposing counsel regarding mediation.	MN	0.1	\$650.00	\$65.00
05/23/25	Email and text to client.	MN	0.1	\$650.00	\$65.00

05/23/25	Call with client.	MN	0.3	\$650.00	\$195.00
05/27/25	Texts with client.	MN	0.2	\$650.00	\$130.00
06/02/25	Email to opposing counsel regarding mediation.	MN	0.1	\$650.00	\$65.00
06/04/25	Email to expert regarding mediation.	MN	0.2	\$650.00	\$130.00
06/04/25	Email to opposing counsel regarding mediation.	MN	0.1	\$650.00	\$65.00
06/06/25	Emails to opposing counsel regarding mediation production.	MN	0.2	\$650.00	\$130.00
06/06/25	Email to expert mediation documents.	MN	0.1	\$650.00	\$65.00
06/10/25	Email to opposing counsel regarding mediation production.	MN	0.1	\$650.00	\$65.00
06/10/25	Email to expert regarding mediation.	MN	0.1	\$650.00	\$65.00
06/16/25	Email to expert regarding mediation.	MN	0.1	\$650.00	\$65.00
06/16/25	Email to staff to save document and calendar continued hearing date.	MN	0.1	\$650.00	\$65.00
06/20/25	Review of mediation production.	MN	4.7	\$650.00	\$3,055.00
06/23/25	Continued review of mediation production.	MN	2.3	\$650.00	\$1,495.00
06/23/25	Call with client.	MN	0.6	\$650.00	\$390.00
06/23/25	Draft mediation brief.	MN	1.5	\$650.00	\$975.00
06/24/25	Draft mediation brief.	MN	3.1	\$650.00	\$2,015.00
06/25/25	Email to expert regarding mediation.	MN	0.1	\$650.00	\$65.00
06/25/25	Call with client.	MN	0.2	\$650.00	\$130.00
06/25/25	Continued draft of mediation brief.	MN	3.2	\$650.00	\$2,080.00

06/25/25	Communications with team regarding the mediation brief.	MN	0.6	\$650.00	\$390.00
06/26/25	Email to expert regarding mediation.	MN	0.1	\$650.00	\$65.00
06/26/25	Draft mediation brief.	MN	2.4	\$650.00	\$1,560.00
06/26/25	Email to expert regarding mediation.	MN	0.1	\$650.00	\$65.00
06/26/25	Edits to mediation brief.	MN	0.7	\$650.00	\$455.00
06/30/25	Finalization of mediation brief.	MN	1.0	\$650.00	\$650.00
06/30/25	Email brief to mediator.	MN	0.1	\$650.00	\$65.00
06/30/25	Emails to financial advisor.	MN	0.2	\$650.00	\$130.00
06/30/25	Email of mediation brief to opposing counsel.	MN	0.1	\$650.00	\$65.00
06/30/25	Email to opposing counsel regarding Defendant's financial documents.	MN	0.1	\$650.00	\$65.00
07/01/25	Email to financial advisor.	MN	0.1	\$650.00	\$65.00
07/01/25	Call with class member.	MN	0.4	\$650.00	\$260.00
07/01/25	Research on higher pay.	MN	0.5	\$650.00	\$325.00
07/01/25	Attendance at mediation.	MN	6.5	\$650.00	\$4,225.00
07/01/25	Call with client regarding the mediator's proposal.	MN	0.4	\$650.00	\$260.00
07/02/25	Call with client regarding mediator's proposal.	MN	0.3	\$650.00	\$195.00
07/02/25	Email to opposing counsel.	MN	0.1	\$650.00	\$65.00
07/03/25	Draft long-form settlement agreement.	MN	3.5	\$650.00	\$2,275.00
07/14/25	Edits to class notice.	MN	0.8	\$650.00	\$520.00
07/14/25	Email to settlement team.	MN	0.1	\$650.00	\$65.00
07/31/25	Email to opposing counsel regarding the long-form agreement.	MN	0.1	\$650.00	\$65.00

07/31/25	Email to administrators for bids.	MN	0.2	\$650.00	\$130.00
08/01/25	Draft joint report.	MN	0.5	\$650.00	\$325.00
08/01/25	Emails to opposing counsel regarding the joint report.	MN	0.4	\$650.00	\$260.00
08/01/25	Email to staff to file the joint report.	MN	0.1	\$650.00	\$65.00
08/13/25	Email to court regarding remote appearance.	MN	0.1	\$650.00	\$65.00
08/13/25	Email to opposing counsel regarding remote appearance.	MN	0.1	\$650.00	\$65.00
08/14/25	Court appearance at CMC.	MN	1.7	\$650.00	\$1,105.00
08/14/25	Draft appearance memo.	MN	0.3	\$650.00	\$195.00
09/22/25	Emails to opposing counsel regarding the long-form agreement.	MN	0.2	\$650.00	\$130.00
10/27/25	Email to opposing counsel regarding the long-form agreement.	MN	0.1	\$650.00	\$65.00
10/27/25	Draft joint report.	MN	0.5	\$650.00	\$325.00
10/27/25	Email to opposing counsel regarding the joint report.	MN	0.1	\$650.00	\$65.00
01/20/26	Final edits to the long-form agreement and class notice.	MN	0.4	\$650.00	\$260.00
01/20/26	Email to opposing counsel regarding the long-form agreement.	MN	0.1	\$650.00	\$65.00
01/21/26	Call with client.	MN	0.4	\$650.00	\$260.00
01/23/26	Emails to opposing counsel regarding the long-form agreement.	MN	0.2	\$650.00	\$130.00

03/04/26	Email to opposing counsel regarding the court's tentative ruling.	MN	0.1	\$650.00	\$65.00
03/26/26	Draft joint report in the <i>Magallanes</i> matter.	MN	0.5	\$650.00	\$325.00
03/26/26	Email to opposing counsel regarding the joint report	MN	0.1	\$650.00	\$65.00
03/26/26	Email to staff to file the joint report.	MN	0.1	\$650.00	\$65.00
03/30/26	Email to settlement team.	MN	0.1	\$650.00	\$65.00
04/13/26	Court appearance at CMC in the <i>Magallanes</i> matter.	MN	0.7	\$650.00	\$455.00
06/23/26	Email to settlement team.	MN	0.1	\$650.00	\$65.00
TOTALS:			62.3		\$40,495.00

EXHIBIT 3

			Type	Date	Num	Class	Source Name	Memo	Amount	Balance
500000	·	COS								
		501500	·	Court Filing Fees						
			Bill	12/04/2024	84435	BobsTowing(Crawford).W&H	Valpro Attorney Services, LLC	84435-BobsTowing(Crawford).W&H-File POS	45.00	45.00
			Credit Card Charge	04/04/2024	22554050	BobsTowing(Crawford).W&H	One Legal LLC	22554050-CCCS,Summ,Comp-Atty Svc for Court Filing-247896 D	597.11	642.11
			Credit Card Charge	04/10/2024	22554051	BobsTowing(Crawford).W&H	One Legal LLC	22554051-CCCS,Comp,Summ-Atty Svc for Court Filing-247896 D	123.54	765.65
			Credit Card Charge	04/15/2024	22649610	BobsTowing(Crawford).W&H	One Legal LLC	22649610-Filing Service-Atty Svc for Court Filing-247896 Darrin C	92.66	858.31
			Credit Card Charge	04/26/2024	22732279	BobsTowing(Crawford).W&H	One Legal LLC	22732279-CMCS-Atty Svc for Court Filing-247896 Darrin Crawfor	98.83	957.14
			Credit Card Charge	04/26/2024	22741506	BobsTowing(Crawford).W&H	One Legal LLC	22741506-SCS-Atty Svc for Court Filing-247896 Darrin Crawford	1,128.33	2,085.47
			Credit Card Charge	05/02/2024	22787970	BobsTowing(Crawford).W&H	One Legal LLC	22787970-Minute ord re:CMC-Atty Svc for Court Filing-247896 D	98.83	2,184.30
			Credit Card Charge	06/28/2024	23161161	BobsTowing(Crawford).W&H	One Legal LLC	23161161-247896-Atty Svc for Court Filing-Stip-BobsTowing(Crav	121.48	2,305.78
			Credit Card Charge	08/23/2024	23545941	BobsTowing(Crawford).W&H	One Legal LLC	23545941-247896-Atty Svc for Court Filing-1st AmendClass & R	151.34	2,457.12
			Credit Card Charge	09/10/2024	23680298	BobsTowing(Crawford).W&H	One Legal LLC	23680298-247896-Atty Svc for Court Filing-CMS-BobsTowing(Cra	101.92	2,559.04
			Credit Card Charge	10/08/2024	23818077	BobsTowing(Crawford).W&H	One Legal LLC	23818077-247896-Atty Svc for Court Filing-POS-BobsTowing(Cra	118.74	2,677.78
			Credit Card Charge	09/26/2024	23818078	BobsTowing(Crawford).W&H	One Legal LLC	23818078-247896-Atty Svc for Court Filing-POS,Prop Ord-BobsT	9.29	2,687.07
			Credit Card Charge	11/27/2024	24211256	BobsTowing(Crawford).W&H	One Legal LLC	24211256-247896-Atty Svc for Court Filing-CMS-BobsTowing(Cra	98.09	2,785.16
			Credit Card Charge	11/25/2024	24211257	BobsTowing(Crawford).W&H	One Legal LLC	24211257-247896-Atty Svc for Court Filing-Stip & Ord-BobsTowir	8.26	2,793.42
			Credit Card Charge	12/06/2024	24241901	BobsTowing(Crawford).W&H	One Legal LLC	24241901-247896-Atty Svc for Court Filing-Jury Fees Posted-Bol	252.96	3,046.38
			Credit Card Charge	12/02/2024	24241902	BobsTowing(Crawford).W&H	One Legal LLC	24241902-247896-Atty Svc for Court Filing-Jury Fees Posted-Bol	8.26	3,054.64
			Credit Card Charge	12/11/2024	24300654	BobsTowing(Crawford).W&H	One Legal LLC	24300654-247896-Atty Svc for Court Filing-Notice-BobsTowing(C	24.99	3,079.63
			Credit Card Charge	01/22/2025	24550242	BobsTowing(Crawford).W&H	One Legal LLC	24550242-247896-Atty Svc for Court Filing-Joint Stmt-BobsTowir	26.02	3,105.65
			Credit Card Charge	04/30/2025	25180919	BobsTowing(Crawford).W&H	One Legal LLC	25180919-247896-Atty Svc for Court Filing-Declar,POS-BobsTow	129.06	3,234.71
			Credit Card Charge	04/17/2025	25180920	BobsTowing(Crawford).W&H	One Legal LLC	25180920-247896-Atty Svc for Court Filing-Declar,POS-BobsTow	2.07	3,236.78
			Credit Card Charge	04/21/2025	25189414	BobsTowing(Crawford).W&H	One Legal LLC	25189414-247896-Atty Svc for Court Filing-CMS-BobsTowing(Cra	129.06	3,365.84
			Credit Card Charge	04/18/2025	25189415	BobsTowing(Crawford).W&H	One Legal LLC	25189415-247896-Atty Svc for Court Filing-CMS-BobsTowing(Cra	1.03	3,366.87
			Credit Card Charge	04/24/2025	25214591	BobsTowing(Crawford).W&H	One Legal LLC	25214591-247896-Atty Svc for Court Filing-Declar,POS-BobsTow	129.06	3,495.93
			Credit Card Charge	04/22/2025	25214592	BobsTowing(Crawford).W&H	One Legal LLC	25214592-247896-Atty Svc for Court Filing-Declar,POS-BobsTow	2.07	3,498.00
		Total 501500	·	Court Filing Fees					3,498.00	3,498.00

[illegible]

