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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN BERNARDINO

CATHERINE GAMBOA, individually, and on behalf of other members of the general public similarly situated,

Plaintiff,

v.

MOTHERLY COMFORT HOME CARE LLC, a California limited liability company; DOES 1 through 10, inclusive,

Defendants.

Case No.: CIVRS2402550

[Assigned for All Purposes to the Honorable Jay H. Robinson, Dept. R14]

DECLARATION OF TYLER J. WOODS IN SUPPORT OF PLAINTIFF'S MOTION FOR FINAL APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT

Final Approval Hearing:
Date: November 18, 2026
Time: 8:30 a.m.
Dept.: R14

Complaint filed: November 22, 2024
FAC filed: December 26, 2024
Trial date: Not Set

DECLARATION OF TYLER J. WOODS

I, Tyler J. Woods, declare as follows:

1. I am an attorney at law licensed to practice before all of the courts of the State of California. I am a Senior Partner at Wilshire Law Firm, PLC ("WLF" or "Class Counsel"), counsel of record for Plaintiff Catherine Gamboa ("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, Davis in 1999 with a Bachelor of Arts degree in Communications with minors in Spanish and Psychology. I received by Juris Doctor from USC Gould School of Law in 2004.

7. Upon graduating from law school in 2004, I worked for international firm McDermott Will & Emery LLP practicing general litigation which included employment law matters. Since 2010, and exclusively since 2013, my practice has focused on labor and employment matters including handling wage and hour class, collective, and representative actions (including the California Private Attorneys general Act or "PAGA"), including at the law firms of McDermott

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

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

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

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

11. I have also presented monthly webinars on labor and employment issues to hundreds of participants since 2022, including on wage and hour issues. For example, I presented "10 Reasons Employers Get Sued (and How to Avoid These Mistakes" (while a partner with Fisher Phillips) and "Key Insights for Hospitality Employers: Arbitration Agreements 101" (while a partner with Fisher Phillips). My current contingent billing rate of $1,200 per hour.

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

Before joining Wilshire Law Firm, he served as head of the Wage and Hour Department at Warmuth Law, where he gained extensive experience managing wage and hour matters and negotiating settlements on behalf of employees. As a Senior Attorney at WLF, he leads and manages multiple complex wage and hour class and representative actions under the California Private Attorneys General Act ("PAGA"). He is currently overseeing more than one hundred active class action and PAGA representative matters pending in courts throughout the State of California. Mr. Yoo currently bills at an hourly rate of $800.00.

13. Heriberto Ponce is an Attorney at WLF, where he focuses his practice on complex employment litigation, including class and representative actions under the California Private Attorneys General Act ("PAGA"). He graduated from the University of Iowa College of Law in 2021 and was admitted to practice law in the State of California the same year. Before joining WLF, Mr. Ponce practiced at Fisher Phillips LLP, where he represented private employers in a broad range of labor and employment matters, including wage and hour disputes, discrimination, retaliation, and other FEHA related claims. Prior to entering private practice, Mr. Ponce served as a Deputy District Attorney with the Riverside County District Attorney's Office, where he prosecuted criminal matters and gained extensive courtroom experience. Mr. Ponce currently bills at an hourly rate of $550.00.

14. Ruby Carrera is an Associate Attorney at Wilshire Law Firm. She graduated from the University of California, Davis with a Bachelor of Arts in Communications, and earned her Juris Doctor from Santa Clara University School of Law in 2020. She was admitted to the California State Bar in 2022. Ruby has represented clients in both state and federal courts in a wide range of matters, including wrongful termination, workplace harassment, wage and hour disputes, partition actions, and real estate litigation. Before joining Wilshire Law Firm, she focused her practice on single-plaintiff employment cases, where she gained significant experience litigating wage and hour claims and other employment-related disputes. She now focuses her practice on wage-and-hour law, including Private Attorneys General Act of 2004 ("PAGA") matters. Ms. Carrera currently bills at an hourly rate of $550.00.

15. Giancarlo A. Recinos is a Senior Attorney at WLF. He was admitted to practice

law in the State of California in 2012 and is an active member in good standing with the State Bar of California. Mr. Recinos graduated from San Francisco State University with a Bachelor of Arts in Communications and received his Juris Doctor from Southwestern Law School. For over a decade, his practice has focused on employment law and wage -and-hour compliance. Mr. Recinos currently bills at an hourly rate of $950.00.

16. Conor J.D. Gomez was an Attorney at WLF. Mr. Gomez was responsible for finalizing resolved class action and PAGA matters, ensuring that they were carried through the approval and distribution process in an efficient manner and in compliance with court orders. He graduated from the University of California, Los Angeles School of Law in May 2020. Mr. Gomez passed the California Bar Examination on his first attempt and was admitted to practice in May 2021. He is admitted to practice law in the State of California and before the Northern District of California. Mr. Gomez billed at an hourly rate of $575.00.

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

18. In support of the reasonableness of WLF's hourly rates, attached as **Exhibit 1** is a

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

a. The Real Rate Report further shows that in the San Diego market, partners with 21 or more years of experience command third-quartile billing rates of approximately $1,334 per hour, confirming that highly experienced litigators in major Southern California markets routinely bill at the upper end of the rate spectrum.

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

19. In an article entitled "Big Law Rates Topping $2,000 Leave Value 'In Eye of Beholder,'" written by Roy Strom and published by Bloomberg Law on June 9, 2022, the author describes how Big Law firms have crossed the $2,000-per hour rate. The article also notes that law firm rates have been increasing by just under 3% per year. A true and correct copy of this article is attached hereto as **Exhibit 2**.

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

a. the investigation of the matter, including meeting with Plaintiff, reviewing Defendant's Motherly Comfort Home Care LLC ("Defendant") policies, and requesting and reviewing Plaintiff's time and pay records, personnel file, and exploring the corporate structure of Defendant;

b. filing the Action;

c. attending status conferences and meeting and conferring with Defendant regarding the case;

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

e. selecting a mediator and mediation date;

f. working with opposing counsel for the receipt of a representative sampling and analyzing the same with the aid of a consultant and Plaintiff to perform analyses of liability and exposure prior to attendance of the mediation in this matter;

g. reviewing policy documents from Defendant and researching applicable

defenses;

h. preparing the mediation brief and damages model for use at mediation;

i. attending the mediation;

j. communicating with Plaintiff;

k. negotiating, finalizing and fully executing the settlement agreement;

l. preparing and filing the Motion for Preliminary Approval and supporting documents;

m. attending the hearing on Motion for Preliminary Approval;

n. communicating with any Class Members who sought additional information regarding the settlement; and

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

21. WLF's current lodestar reflects the efficiencies achieved by attorneys experienced in this field with **94.1** hours of work resulting in **$69,530.00** in fees. Attached as **Exhibit 4** is the Attorney's detailed billing. The chart below shows the calculation of hours spent by each of WLF's attorneys on this case:

Attorney	**Hours**	**Hourly Rate**	**Total**
Tyler J. Woods	14.2	$1,200.00	$17,040.00
James Yoo	22.95	$800.00	$18,360.00
Heriberto Ponce	34.8	$550.00	$19,140.00
Ruby Carrera	3.2	$550.00	$1760.00
Giancarlo A. Recinos	6.3	$950.00	$5,985.00
Conor J.D. Gomez	12.6	$575.00	$7,245.00
TOTAL	**94.1**		**$7,245.00**

22. This amount surpasses the requested fee award of $67,954.49, 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 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 Plaintiff is confident in the merits of her claims, a legitimate controversy exists as to each cause of action, posing an actual risk that Plaintiff may not succeed at class certification and/or trial. Any of these obstacles could have prevented recovery completely, meaning Class Counsel would have been left with no compensation for all the time and money invested in litigating this case. Despite these risks, Class Counsel took this case on a contingency basis so that Class Members (a particularly vulnerable group of hourly paid workers) could be compensated for their unpaid wages. Consequently, Class Counsel was precluded from focusing on, or taking on, other cases which could have resulted in a larger, and less risky, monetary gain.

23. In litigation costs, Wilshire Law Firm, PLC, has spent $7,986.59 on items such as filing fees, service fees, mediation fees, and consultant fees. A true and correct copy of a breakdown of costs incurred by my office is attached hereto as **Exhibit 3**. Additionally, we anticipate incurring $300.00 in anticipated future costs for filing fees and service fees for a total of $8,286.59 in costs. Since Class Counsel's costs did not reach the maximum of $10,000.00, the remaining $1,713.41 will revert to and increase the Net Settlement Amount.

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

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

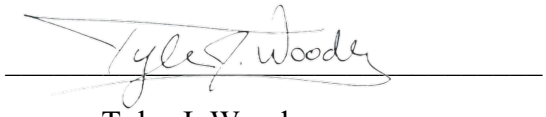
/ / /

/ / /

[*Signature on the next page*]

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

Executed on October 22, 2026 at Los Angeles, California.



Tyler J. Woods

EXHIBIT 1



ELM Solutions

2025 Real Rate Report® powered by LegalVIEW® DynamicInsights

The industry's leading analysis of law firm rates, trends, and practices

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Table of Contents - 2025 Real Rate Report

A Letter to Our Readers • 4

Real Rate Report Overview • 5

Section I: High-Level Data Cuts • 9

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

Section II: Industry Analysis • 71

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

Section III: Practice Area Analysis • 98

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

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

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

Section V: International Analysis • 226

Section VI: Matter Staffing Analysis • 255

Appendix: Data Methodology • 259

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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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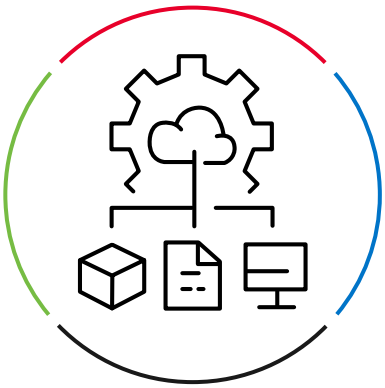
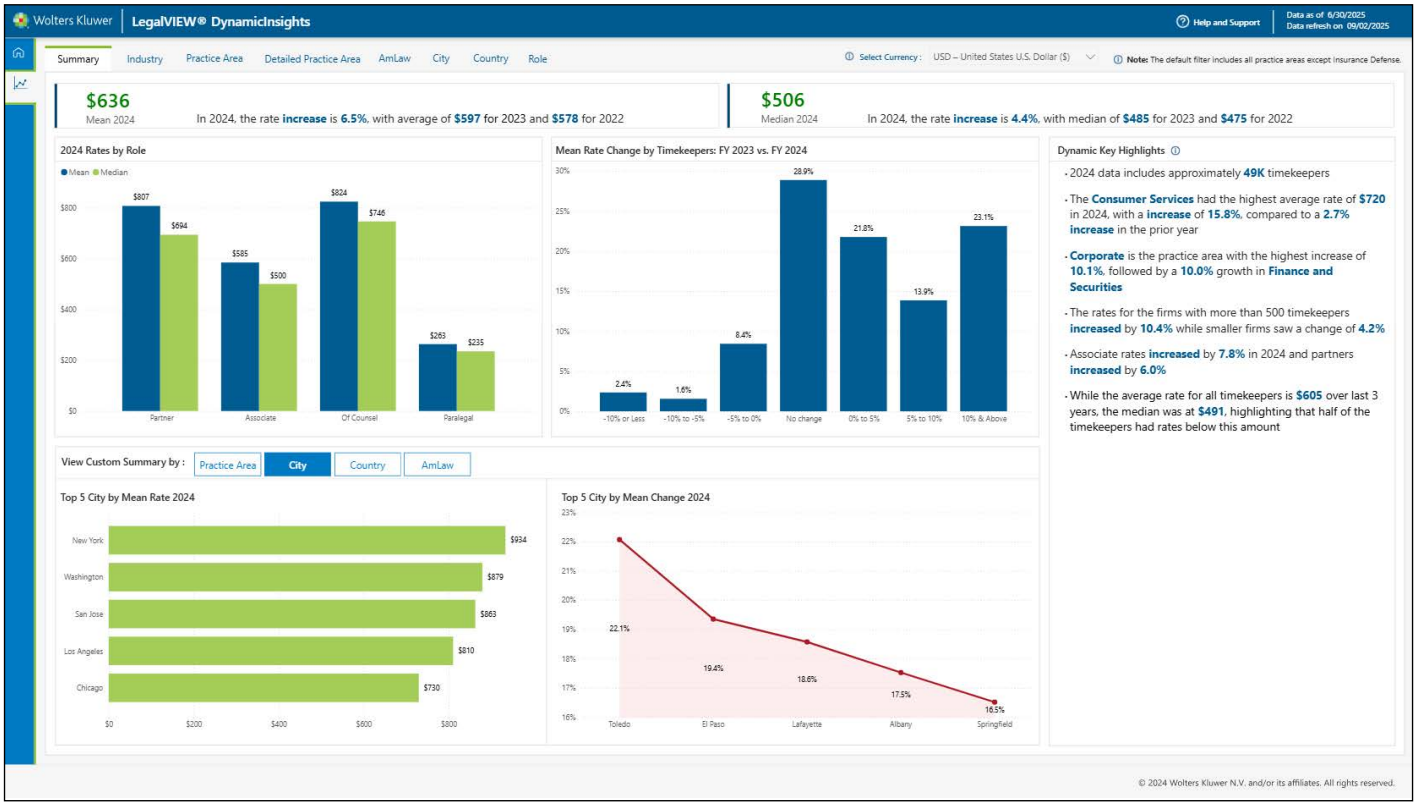
- **Insight-Driven Decision Making:** Enables analysis across key dimensions to support strategic negotiations and financial optimization.





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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

Free Newsletter Sign Up

Business & Practice

Big Law Rates Topping $2,000 Leave Value ‘In Eye of Beholder’

By Roy Strom

Column
June 9, 2022, 2:30 AM

Welcome back to the Big Law Business column on the changing legal marketplace written by me, Roy Strom. Today, we look at a new threshold for lawyers’ billing rates and why it’s so difficult to put a price on high-powered attorneys. Sign up to receive this column in your inbox on Thursday mornings. Programming note: Big Law Business will be off next week.

Some of the nation’s top law firms are charging more than $2,000 an hour, setting a new pinnacle after a two-year burst in demand.

Partners at Hogan Lovells and Latham & Watkins have crossed the threshold, according to court documents in bankruptcy cases filed within the past year.

Other firms came close to the mark, billing more than $1,900, according to the documents. They include Kirkland & Ellis, Simpson Thacher & Bartlett, Boies Schiller Flexner, and Sidley Austin.

Simpson Thacher & Bartlett litigator Bryce Friedman, who helps big-name clients out of jams, especially when they’re accused of fraud, charges $1,965 every 60 minutes, according to a court document.

In need of a former acting US Solicitor General? Hogan Lovells partner Neal Katyal bills time at $2,465 an hour. Want to hire famous litigator David Boies? That’ll cost $1,950 an hour (at least). Reuters was first to report their fees.

Eye-watering rates are nothing new for Big Law firms, which typically ask clients to pay higher prices at least once a year, regardless of broader market conditions.

“Value is in the eye of the beholder,” said John O’Connor, a San Francisco-based expert on legal fees. “The perceived value of a good lawyer can reach into the multi-billions of dollars.”

Kirkland & Ellis declined to comment on its billing rates. None of the other firms responded to requests to comment.

Charge It Up

Big Law firms are crossing the $2,000-an-hour threshold after two years of surging rates driven by an increase in demand for lawyers.

Firm	Highest Billing Rate
Hogan Lovells	$2,465
Latham & Watkins	$2,075
Kirkland & Ellis	$1,995
Simpson Thacher & Bartlett	$1,965
Boies Schiller Flexner	$1,950
Sidley Austin	$1,900

Source: Court documents

Bloomberg Law

Law firms have been more successful raising rates than most other businesses over the past 15 years.

Law firm rates rose by roughly 40 percent from 2007 to 2020, or just short of 3 percent per year, Thomson Reuters Peer Monitor data show. US inflation rose by about 28% during that time.

The 100 largest law firms in the past two years achieved their largest rate increases in more than a decade, Peer Monitor says. The rates surged more than 6% in 2020 and grew another 5.6% through November of last year. Neither level had been breached since 2008.

The price hikes occurred during a once-in-a-decade surge in demand for law services, which propelled profits at firms to new levels. Fourteen law firms reported average profits per equity partner in 2021 over $5 million, according to data from The American Lawyer. That was up from six the previous year.

The highest-performing firms, where lawyers charge the highest prices, have outperformed their smaller peers. Firms with leading practices in markets such as mergers and acquisitions, capital markets, and real estate were forced to turn away work at some points during the pandemic-fueled surge.

Firms receive relatively tepid pushback from their giant corporate clients, especially when advising on bet-the-company litigation or billion-dollar deals.

The portion of bills law firms collected—a sign of how willingly clients pay full-freight—rose during the previous two years after drifting lower following the Great Financial Crisis. Collection rates last year breached 90% for the first time since 2009, Peer Monitor data show.

Professional rules prohibit lawyers from charging “unconscionable” or “unreasonable” rates. But that doesn’t preclude clients from paying any price they perceive as valuable, said Jacqueline Vinaccia, a San Diego-based lawyer who testifies on lawyer fee disputes.

Lawyers’ fees are usually only contested when they will be paid by a third party.

That happened recently with Hogan Lovells’ Katyal, whose nearly $2,500 an hour fee was contested in May by a US trustee overseeing a bankruptcy case involving a Johnson & Johnson unit facing claims its talc-based powders caused cancer.

The trustee, who protects the financial interests of bankruptcy estates, argued Katyal’s fee was more than $1,000 an hour higher than rates charged by lawyers in the same case at Jones Day and Skadden Arps Slate Meagher & Flom.

A hearing on the trustee’s objection is scheduled for next week. Hogan Lovells did not respond to a request for comment on the objection.

Vinaccia said the firm’s options will be to reduce its fee, withdraw from the case, or argue the levy is reasonable, most likely based on Katyal’s extensive experience arguing appeals.

Still, the hourly rate shows just how valuable the most prestigious lawyers’ time can be—even compared to their highly compensated competitors.

“If the argument is that Jones Day and Skadden Arps are less expensive, then you’re already talking about the cream of the crop, the top-of-the-barrel law firms,” Vinaccia said. “I can’t imagine a case in which I might argue those two firms are more reasonable than the rates I’m dealing with.”

Worth Your Time

On Cravath: Cravath Swaine & Moore is heading to Washington, opening its first new office since 1973 by hiring former heads of the U.S. Securities and Exchange Commission and Federal Deposit Insurance Corporation. Meghan Tribe reports the move comes as Big Law firms are looking to add federal government expertise as clients face more regulatory scrutiny.

On Big Law Promotions: It’s rare that associates get promotions to partner in June, but Camille Vasquez is now a Brown Rudnick partner after she shot to fame representing Johnny Depp in his defamation trial against ex-wife Amber Heard.

On Working From Home: I spoke this week with Quinn Emanuel’s John Quinn about why he thinks law firm life is never going back to the office-first culture that was upset by the pandemic. Listen to the podcast here.



00:00:00

That's it for this week! Thanks for reading and please send me your thoughts, critiques, and tips.

To contact the reporter on this story: Roy Strom in Chicago at rstrom@bloomberglaw.com

To contact the editors responsible for this story: Chris Opfer at copfer@bloomberglaw.com; John Hughes at jhughes@bloombergindustry.com

Documents

Trustee's Objection

Related Articles

Overworked Big Law Can't Find Enough Lawyers With Demand Surging — Dec. 9, 2021, 3:00 AM

Never Underestimate Big Law's Ability to Raise Billing Rates — Aug. 12, 2021, 3:00 AM

Law Firms

Simpson Thacher
Hogan Lovells
Jones Day
Skadden
Sidley Austin
Quinn Emanuel
Cravath Swaine & Moore
Latham & Watkins
Kirkland & Ellis
Boies Schiller Flexner

Topics

expert fees
compensation of bankruptcy attorney
acquisitions
U.S. trustees
financial markets
client-paid legal fees
data breaches

Companies

Johnson & Johnson
Thomson Reuters Corp

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EXHIBIT 3

Wilshire Law Firm, PLC

Transaction Detail by Account

All Transactions

Accrual Basis

Type	Date	Num	Memo	Description	Amount	Balance
Mediation Fees						
	08/13/2025	BILLJM081325-01	Mediation Fees - Amundson Mediation Inc	50% Mediation Fee	$5,000.00	$5,000.00
Total MEDIATION FEES					$5,000.00	$5,000.00
Consultant Fees						
	10/01/2025	184093	Consulting Fees - Creal Consulting Inc		$955.00	$955.00
Total CONSULTANT FEES					$955.00	$955.00
Filing Fees						
	10/21/2024		Filing Fees - Department of Industrial Relations	PAGA Notice	$75.00	$75.00
	11/04/2024	23965487	Filing Fees - One Legal LLC	Complaint	$15.44	$90.44
	11/21/2024	24074185	Filing Fees - One Legal LLC	Complaint	$15.44	$105.88
	12/19/2024	24202060	Process Service Fees - One Legal LLC	Complaint	$1,503.53	$1,609.41
	01/02/2025	85697	Filing Fees - Valpro Attorney Services, LLC	Serve Motherly Comfort	$118.00	$1,727.41
	01/07/2025	86042	Filing Fees - Valpro Attorney Services, LLC	POS	$45.00	$1,772.41
	05/23/2025	25340597	Filing Fees - One Legal LLC	Notice	$23.63	$1,796.04
	06/16/2025	25609551	Filing Fees - One Legal LLC	CMCS	$23.63	$1,819.67
	07/01/2025	CC073125TA-617	Filing Fees - One Legal LLC	Notice	$23.63	$1,843.30
	07/30/2025	CC083125TA-0800	Filing Fees - One Legal LLC	Notice	$23.63	$1,866.93
	02/05/2026	CC022826TA-0464	Filing Fees - One Legal LLC	Notice	$24.73	$1,891.66
	04/30/2026	CC043026TA-3089	Filing Fees - One Legal LLC	MPA	$87.86	$1,979.52
	06/11/2026	CC063026TA-1043	Filing Fees - One Legal LLC	CMCS	$24.73	$2,004.25
	06/29/2026	CC063026TA-2513	Document Purchase - San Bernardino Superior Court	Document Purchase	$0.11	$2,004.36
	06/29/2026	CC063026TA-2514	Document Purchase - San Bernardino Superior Court	Document Purchase	$2.50	$2,006.86
	07/01/2026	CC073126TA-0147	Filing Fees - One Legal LLC	Notice	$24.73	$2,031.59
Total FILING FEES					$2,031.59	$2,031.59
TOTAL					**$7,986.59**	**$7,986.59**

EXHIBIT 4

Date	Client Matter
04/14/2025	Motherly Comfort Home Care, LLC
04/22/2025	Motherly Comfort Home Care, LLC
04/29/2025	Motherly Comfort Home Care, LLC
04/29/2025	Motherly Comfort Home Care, LLC
05/02/2025	Motherly Comfort Home Care, LLC
05/05/2025	Motherly Comfort Home Care, LLC
05/07/2025	Motherly Comfort Home Care, LLC
05/08/2025	Motherly Comfort Home Care, LLC
05/28/2025	Motherly Comfort Home Care, LLC
06/13/2025	Motherly Comfort Home Care, LLC
06/17/2025	Motherly Comfort Home Care, LLC
06/18/2025	Motherly Comfort Home Care, LLC
09/19/2025	Motherly Comfort Home Care, LLC
06/26/2025	Motherly Comfort Home Care, LLC
06/30/2025	Motherly Comfort Home Care, LLC
07/18/2025	Motherly Comfort Home Care, LLC
08/12/2025	Motherly Comfort Home Care, LLC
08/12/2025	Motherly Comfort Home Care, LLC
08/12/2025	Motherly Comfort Home Care, LLC
08/13/2025	Motherly Comfort Home Care, LLC
09/11/2025	Motherly Comfort Home Care, LLC
09/12/2025	Motherly Comfort Home Care, LLC
09/17/2025	Motherly Comfort Home Care, LLC
09/26/2025	Motherly Comfort Home Care, LLC
09/19/2025	Motherly Comfort Home Care, LLC
09/23/2025	Motherly Comfort Home Care, LLC
09/23/2025	Motherly Comfort Home Care, LLC
09/25/2025	Motherly Comfort Home Care, LLC
09/30/2025	Motherly Comfort Home Care, LLC
10/02/2025	Motherly Comfort Home Care, LLC
10/07/2025	Motherly Comfort Home Care, LLC
10/09/2025	Motherly Comfort Home Care, LLC
10/10/2025	Motherly Comfort Home Care, LLC
10/21/2025	Motherly Comfort Home Care, LLC
10/24/2025	Motherly Comfort Home Care, LLC

10/28/2025	Motherly Comfort Home Care, LLC
12/29/2025	Motherly Comfort Home Care, LLC
12/30/2025	Motherly Comfort Home Care, LLC
01/21/2026	Motherly Comfort Home Care, LLC
01/27/2026	Motherly Comfort Home Care, LLC
01/27/2026	Motherly Comfort Home Care, LLC
02/03/2026	Motherly Comfort Home Care, LLC
02/03/2026	Motherly Comfort Home Care, LLC
02/03/2026	Motherly Comfort Home Care, LLC
03/13/2026	Motherly Comfort Home Care, LLC
04/13/2026	Motherly Comfort Home Care, LLC
04/21/2026	Motherly Comfort Home Care, LLC
06/15/2026	Motherly Comfort Home Care, LLC

TOTAL

Description of Action Taken or Costs Incurred

Confer with team regarding case status and next steps
Review and analyze request for authority to resolve plaintiff's individual claims; approve request

Confer with team regarding discovery response deadlines and case status
Develop settlement strategy based on facts of case
Confer with team regarding strategy, including conducting discovery before settlement, applicable IWC wage order, and amending complaint to add joint employer
Confer with team regarding case strategy
Review and revise Special Interrogatories, Form Interrogatories, Requests for Production and Request for Admissions prior to service.
Review notice of change of handling attorneys
Review and analyze proposed Compromise & Release in Plaintiff's Worker's Comp case to determine if release impacts claims in wage and hour case
Review and revise joint case management statement
Review and revise Plaintiff's responses to Defendant's Special Interrogatories, Form Interrogatories, Request for Admissions and Requests for Production
Review and finalize revised drafts of Plaintiff's responses to Defendant's Special Interrogatories, Form Interrogatories, Request for Admissions and Requests for Production
Confer with J. Yoo and E. Ponce regarding settlement range and settlement authority
Analyze mediators proposed by Defendant
Advise regarding granting Defendant's requested extension to respond to discovery requests
Analyze Defendant's revisions to pre-mediation discovery requests and advise regarding same

Advise regarding meet and confer strategy regarding Defendant's failure to respond to outstanding discovery requests
Advise regarding scheduling of mediation with Steve Amundson
Discuss and advise regarding staying discovery pending mediation
Outline stipulation to stay discovery pending mediation
Analyze financial records produced by Defendant to determine if Defendant is in financial distress

Analyze prior cases settled with opposing counsel to determine potential settlement range
Review and revise stipulation to stay discovery prepared by opposing counsel
Review defense counsel's confirmation of class and PAGA settlement; confer with team regarding cancellation of mediation
Analyze expert's analysis of Defendant's financial records and recommendation of potential settlement
Outline settlement strategy and opening demand
Review and analyze defendant's response to opening settlement demand, and outline response thereto
Analyze Defendant's reduced settlement offer and outline response thereto
Report class settlement terms for internal approval
Analyze Defendant's proposed payment plan and outline response thereto
Outline two potential options for a proposed payment plan for settlement
Review and revise draft memorandum of understanding
Review and analyze Defendant's revisions to the MOU and outline responses thereto
Review and revise revised MOU that incorporates revised payment plan
Analyze opposing counsel's further revisions to the revised MOU and advise

Confer with E. Ponce regarding incorporating defense counsel's revisions to memorandum of understanding and client inquiry regarding payment timing
Review and revise draft long-form class and PAGA settlement agreement
Review and revise PAGA definition in settlement agreement
Review appearance memo regarding case management conference
Review and analyze Defendant's revisions to the settlement agreement, and outline further revisions in response thereto
Review and revise correspondence to opposing counsel regarding revisions to settlement agreement
Review and approve final draft of settlement agreement
Analyze claims administrator bids to determine most economical bid for administration of settlement
Confer with opposing counsel regarding proposed claims administrator
Advise regarding resolution of discrepency between PAGA allocations in settlement agreement

Advise regarding calculation of damages analysis as part of motion for preliminary approval
Review and revise draft Motion for Preliminary Approval
Coordinate coverage of preliminary approval hearing

Person Billing	Hours	Rate	Fees
Tyler Woods	0.1	$1,200	$120.00
Tyler Woods	0.2	$1,200	$240.00
Tyler Woods	0.1	$1,200	$120.00
Tyler Woods	0.5	$1,200	$600.00
Tyler Woods	0.3	$1,200	$360.00
Tyler Woods	0.1	$1,200	$120.00
Tyler Woods	0.5	$1,200	$600.00
Tyler Woods	0.1	$1,200	$120.00
Tyler Woods	0.3	$1,200	$360.00
Tyler Woods	0.1	$1,200	$120.00
Tyler Woods	1.6	$1,200	$1,920.00
Tyler Woods	0.5	$1,200	$600.00
Tyler Woods	0.4	$1,200	$480.00
Tyler Woods	0.2	$1,200	$240.00
Tyler Woods	0.1	$1,200	$120.00
Tyler Woods	0.2	$1,200	$240.00
Tyler Woods	0.3	$1,200	$360.00
Tyler Woods	0.1	$1,200	$120.00
Tyler Woods	0.1	$1,200	$120.00
Tyler Woods	0.2	$1,200	$240.00
Tyler Woods	0.5	$1,200	$600.00
Tyler Woods	0.3	$1,200	$360.00
Tyler Woods	0.3	$1,200	$360.00
Tyler Woods	0.2	$1,200	$240.00
Tyler Woods	0.3	$1,200	$360.00
Tyler Woods	0.4	$1,200	$480.00
Tyler Woods	0.3	$1,200	$360.00
Tyler Woods	0.2	$1,200	$240.00
Tyler Woods	0.2	$1,200	$240.00
Tyler Woods	0.3	$1,200	$360.00
Tyler Woods	0.3	$1,200	$360.00
Tyler Woods	0.4	$1,200	$480.00
Tyler Woods	0.3	$1,200	$360.00
Tyler Woods	0.2	$1,200	$240.00
Tyler Woods	0.2	$1,200	$240.00

Tyler Woods	0.2	$1,200	$240.00
Tyler Woods	0.8	$1,200	$960.00
Tyler Woods	0.2	$1,200	$240.00
Tyler Woods	0.1	$1,200	$120.00
Tyler Woods	0.4	$1,200	$480.00
Tyler Woods	0.1	$1,200	$120.00
Tyler Woods	0.3	$1,200	$360.00
Tyler Woods	0.3	$1,200	$360.00
Tyler Woods	0.1	$1,200	$120.00
Tyler Woods	0.2	$1,200	$240.00
Tyler Woods	0.2	$1,200	$240.00
Tyler Woods	0.8	$1,200	$960.00
Tyler Woods	0.1	$1,200	$120.00
	14.2		**$17,040.00**

Date	Client Matter	Description of Action Taken	Attorny	Hours	Rate	Fees
10/14/2024	Motherly Comfort MAT-240910386988	Zoom client interview with C. Gamboa re facts and discrepancies; prepare client call notes	JY	2.5	$800.00	$2,000.00
10/14/2024	Motherly Comfort MAT-240910386988	Reviewed file	JY	1	$800.00	$1,520.00
10/16/2024	Motherly Comfort MAT-240910386988	Review and revise PAGA notice to LWDA (held for additional edit before submission)	JY	0.7	$800.00	$560.00
10/17-18/2024	Motherly Comfort MAT-240910386988	Review, revise and finalize class action complaint for filing (Complaint_Final)	JY	1	$800.00	$2,240.00
11/1/2024	Motherly Comfort MAT-240910386988	Legal research - Personal Attendants v. Caregivers.	JY	2.7	$800.00	$2,160.00
11/1/2024	Motherly Comfort MAT-240910386988	Telephone conference with OPC S. Sherman (w/ M. DeSario) re claims, personal-attendant exemption (Wage Order 15), DWBR overtime; report to team	JY	0.7	$800.00	$560.00
11/2-11/6/2024	Motherly Comfort MAT-240910386988	Review OPC position letter and $5,000 offer; analyze and research personal-attendant exemption and overtime defenses; confer with R. Carrera re response	JY	1.5	$800.00	$720.00
11/13-11/14/2024	Motherly Comfort MAT-240910386988	Settlement-offer call with client (3:30-4:00 PM) re OPC offer and options; strategy discussion with team	JY	0.5	$800.00	$560.00
11/18/2024	Motherly Comfort MAT-240910386988	Draft and send counter-demand to OPC ($12,000) with PTO, off-the-clock, wage-statement and timing-of-pay analysis; review OPC response.	JY	1.2	$800.00	$880.00
11/19/2024	Motherly Comfort MAT-240910386988	Review client pay stubs/wage statements; analyze sick-leave accrual (1 hr per 30), PTO balance and backdating, off-the-clock reporting; draft email retracting offer and electing to proceed with PAGA/class; spotted the 2024 sick-leave accrual error for every employee, pulled the individual offer and chose the PAGA/class path	JY	2	$800.00	$1,120.00
11/19-11/22/2024	Motherly Comfort MAT-240910386988	Consult re complaint filing rejections (Rancho Cucamonga vs. SB Justice Center) and resubmission	JY	0.3	$800.00	$240.00
Dec-24	Motherly Comfort MAT-240910386988	Review and approve First Amended Complaint adding PAGA cause of action (filed 12/26/24)	JY	0.25	$800.00	$720.00
1/28-2/5/2025	Motherly Comfort MAT-240910386988	Review Defendant's Answer; case status	JY	0.3	$800.00	$240.00
4/1-4/11/2025	Motherly Comfort MAT-240910386988	Review Defendant's discovery to Plaintiff (RFA, FROG-E, FROG-G, RFP set one); strategy with R. Carrera re responses and individual-settlement vs. class track	JY	0.5	$800.00	$720.00
4/29-5/6/2025	Motherly Comfort MAT-240910386988	Review client-produced documents (texts, PTO balances, paystubs, task logs); client call 5/2/25 re new meal-break policy and ADP task records; update client call notes; decision to proceed with class/PAGA claims; direct K. MacRostie and M. Martinez	JY	0.75	$800.00	$1,440.00
7/14/2025	Motherly Comfort MAT-240910386988	Case assessment with E. Ponce re strength of claims and settlement/mediation strategy	JY	0.4	$800.00	$320.00
8/12-8/13/2025	Motherly Comfort MAT-240910386988	Mediation scheduling with S. Amundson (10/28/25); fee split; status update	JY	0.3	$800.00	$240.00

9/11-9/17/2025	Motherly Comfort MAT-240910386988	Coordinate financial consultant K. Creal (ability-to-pay review of Defendant's P&L, balance sheets, tax returns 2022-2024); 9/17 email to Creal re mediation-cancellation deadline and settling without mediator	JY	0.3	$800.00	$880.00
9/19/2025	Motherly Comfort MAT-240910386988	Review Creal report ($160K-$225K ability to pay); review Defendant's class data (615 EEs, 13,948 WW, 3,067 PP) and E. Ponce's exposure estimate; 2 PM strategy call with T. Woods and E. Ponce re settlement range and authority	JY	0.75	$800.00	$1,120.00
9/25-9/30/2025	Motherly Comfort MAT-240910386988	Settlement at $200,000 global (class + PAGA) with installment plan and 10% escalator; review OPC confirming email; consult A. Wilcox re installment-payment settlement templates; mediation cancellation	JY	0.7	$800.00	$560.00
12/2025-1/15/2026	Motherly Comfort MAT-240910386988	Review and revise long-form settlement agreement (LFA) draft; transmit revised LFA draft to E. Ponce (1/15/26)	JY	1.6	$800.00	$1,280.00
1/27-1/30/2026	Motherly Comfort MAT-240910386988	Review OPC redline of LFA (new Sec. 5.3; ADEA/OWBPA release); 1/30/26 email to OPC accepting edits and setting path to finalize	JY	1.1	$800.00	$880.00
2/3-2/10/2026	Motherly Comfort MAT-240910386988	revise LFA; Review administrator bids (Phoenix $9,500); review/revised draft Class Notice (Ex. A); 2/10/26 transmit LFA and Class Notice to OPC	JY	1.5	$800.00	$1,120.00
2/19-2/27/2026	Motherly Comfort MAT-240910386988	Follow up with OPC re Class Notice; review notice-period correction; direct client execution of LFA (2/27/26)	JY	0.4	$800.00	$320.00
		TOTALS		22.95		$18,360.00

Gamboa v. Motherly Home Comfort – Billing Ledger

Current Quantified Hours **34.8**

Date	Hours	Attorney	Billing Entry
07/21/2026	0.3	HP	Telephone conference with opposing counsel regarding settlement notice packet, outstanding approval issues, and approval to proceed with notice administration.
07/21/2026	0.3	HP	Internal conference regarding settlement notice packet, outstanding approval issues, and next steps for coordinating notice distribution.
07/07/2026	0.2	HP	Review calculations provided by Phoenix Settlement Administrators concerning mailing and notice administration for consistency with settlement terms.
07/06/2026	1.3	HP	Review settlement notice packet prepared by claims administrator, including proposed notice documents, applicable deadlines, settlement terms, and administration procedures.
07/01/2026	0.1	HP	Review email correspondence from opposing counsel regarding settlement administration and notice-related matters.
06/30/2026	0.1	HP	Review email correspondence from claims administrator regarding status of settlement administration and notice process.
06/29/2026	0.2	HP	Review email correspondence from claims administrator concerning settlement administration, notice materials, and next steps.
06/29/2026	0.2	HP	Review Notice of Ruling concerning Court's ruling and resulting settlement approval and administration requirements.
06/25/2026	0.4	HP	Telephone conference with client to provide case status update and discuss settlement approval process and anticipated next steps.
04/21/2026	1.6	HP	Review draft memorandum of points and authorities and supporting declarations concerning settlement approval; analyze factual representations, settlement terms, and consistency among supporting papers prior to circulation to opposing counsel.
04/21/2026	0.6	HP	Internal conference regarding expert involvement and Defendant's financial condition, including financial documentation and implications for settlement approval.
04/21/2026	0.8	HP	Revise memorandum of points and authorities in support of settlement approval, including factual background, settlement terms, financial information, and supporting legal analysis.
04/20/2026	0.4	HP	Review revisions to memorandum of points and authorities for consistency with settlement terms and supporting evidence.
04/13/2026	0.1	HP	Communications with expert regarding Dunk Khullar and issues relevant to expert analysis in connection with settlement approval.
04/13/2026	0.3	HP	Review email correspondence regarding missing data points necessary for damages analysis and settlement approval materials.

04/13/2026	0.2 HP	Communicate with client regarding case status, settlement approval process, and anticipated next steps.
04/07/2026	0.1 HP	Review email correspondence regarding outstanding data necessary for damages and settlement analysis.
04/06/2026	0.1 HP	Review email correspondence regarding missing data necessary for settlement-related analysis.
04/01/2026	0.1 HP	Review email correspondence regarding outstanding data necessary for settlement approval submissions.
04/01/2026	0.3 HP	Review final client declaration in support of settlement approval for consistency with settlement terms and supporting motion.
03/19/2026	0.2 HP	Review email correspondence concerning damages calculations and presentation of damages for settlement approval.
03/18/2026	0.3 HP	Internal communications regarding damages analysis, supporting data, and presentation of potential damages.
03/17/2026	0.2 HP	Review Joint Case Management Statement concerning case status, settlement, and upcoming procedural deadlines.
03/11/2026	0.1 HP	Review fully executed long-form settlement agreement and confirm consistency with final negotiated terms.
03/09/2026	0.2 HP	Review executed settlement agreement received from opposing counsel and confirm execution status and final negotiated terms.
03/09/2026	0.2 HP	Review Court's January 21 minute order concerning case status, settlement proceedings, and applicable deadlines.
03/05/2026	0.3 HP	Internal strategy conference regarding attorney signatures and execution requirements for settlement agreement.
03/04/2026	0.2 HP	Review settlement agreement to confirm complete execution by all necessary parties.
03/03/2026	0.2 HP	Review settlement agreement executed by client and confirm consistency with final negotiated settlement terms.
02/25/2026	0.3 HP	Revise Section 3.2.3 of long-form settlement agreement in response to opposing counsel's comments and proposed language.
02/24/2026	0.2 HP	Revise Section 1 of long-form settlement agreement to accurately reflect negotiated settlement terms.
02/23/2026	0.1 HP	Prepare follow-up correspondence regarding proposed class notice and outstanding notice-related issues.
02/10/2026	1.1 HP	Review long-form settlement agreement and proposed class notice, including settlement provisions, notice language, deadlines, administration procedures, and consistency between documents.

02/03/2026	0.3 HP	Review settlement administrator bids, proposed administration costs, and scope of services.
01/29/2026	0.1 HP	Review Notice of Ruling concerning Court directives and deadlines affecting settlement proceedings.
01/27/2026	0.2 HP	Telephone conference with client regarding potential age-related claims and effect of proposed settlement release.
01/27/2026	0.3 HP	Review proposed settlement release language concerning age-related claims and scope of release.
01/27/2026	0.2 HP	Correspond with opposing counsel regarding release language concerning age-related claims and requested revisions.
01/27/2026	1.6 HP	Review opposing counsel's revisions to long-form settlement agreement, including edits to settlement provisions, releases, administration terms, and parties' obligations.
01/21/2026	0.5 HP	Attend Case Management Conference regarding case status, settlement posture, anticipated approval proceedings, and scheduling matters.
01/07/2026	0.2 HP	Review Joint Case Management Statement in preparation for Case Management Conference.
12/30/2025	0.9 HP	Revise long-form settlement agreement consistent with internal comments and negotiated settlement terms.
12/29/2025	2.6 HP	Prepare long-form settlement agreement memorializing negotiated resolution, including settlement structure, releases, administration, class notice, payment procedures, and approval process.
12/21/2025	0.1 HP	Review email correspondence regarding preparation and anticipated timing of long-form settlement agreement.
12/09/2025	0.2 HP	Review fully executed Memorandum of Understanding and confirm consistency with final negotiated settlement terms.
12/03/2025	0.2 HP	Correspond with opposing counsel providing client-executed Memorandum of Understanding and addressing next steps for settlement documentation.
12/03/2025	0.3 HP	Internal communications regarding client's execution of Memorandum of Understanding and next steps for settlement documentation.
12/02/2025	0.2 HP	Review email correspondence from opposing counsel regarding Memorandum of Understanding and finalization of settlement terms.
11/26/2025	0.4 HP	Telephone conference with client to provide case status update and discuss settlement process and anticipated next steps.
10/30/2025	0.8 HP	Telephone conference with client regarding proposed Memorandum of Understanding; explain material settlement terms, release provisions, approval process, and anticipated next steps.

10/30/2025	1.3 HP	Review final revisions to Memorandum of Understanding, including opposing counsel's proposed revisions and consistency with negotiated settlement terms.
10/30/2025	0.2 HP	Review email correspondence from opposing counsel regarding proposed MOU revisions and outstanding settlement issues.
10/28/2025	0.8 HP	Revise Memorandum of Understanding in response to opposing counsel's comments and concerns regarding settlement provisions.
10/28/2025	0.3 HP	Internal conference regarding opposing counsel's MOU concerns, proposed revisions, and settlement negotiation strategy.
10/24/2025	0.3 HP	Review proposed escalator language for Memorandum of Understanding and effect on settlement terms.
10/24/2025	0.2 HP	Review email correspondence from opposing counsel regarding concerns with proposed Memorandum of Understanding.
10/21/2025	1.1 HP	Revise Memorandum of Understanding consistent with discussions with opposing counsel and negotiated settlement terms.
10/20/2025	0.2 HP	Review email correspondence from opposing counsel regarding settlement negotiations and proposed MOU terms.
10/15/2025	0.4 HP	Revise Memorandum of Understanding consistent with internal communications and comments.
10/15/2025	0.4 HP	Telephone conference with opposing counsel regarding settlement negotiations and proposed MOU terms.
10/15/2025	0.3 HP	Review First Amended Complaint in connection with settlement negotiations and scope of claims.
10/10/2025	0.6 HP	Review opposing counsel's proposed edits to Memorandum of Understanding and evaluate revisions to settlement terms.
10/09/2025	1.6 HP	Prepare Memorandum of Understanding and revise draft consistent with internal comments regarding negotiated settlement terms.
10/02/2025	0.5 HP	Internal communications regarding potential settlement installment plan and proposed payment structure.
09/26/2025	0.4 HP	Prepare settlement authority email summarizing settlement posture and requested authority.
09/11/2025	1.9 HP	Review and analyze financial documents concerning Defendant's financial condition and ability to fund potential settlement.
09/10/2025	0.4 HP	Telephone conference with opposing counsel regarding potential settlement, Defendant's financial condition, and potential settlement structure.
09/10/2025	0.5 HP	Discussion with opposing counsel regarding potential informal resolution and settlement framework.

	09/10/2025	0.2 HP	Review introductory email from opposing counsel regarding case and potential resolution.
	05/23/2025	1.1 HP	Review case documents and materials provided by client concerning factual background, claims, and potential damages.
	05/07/2025	0.8 HP	Review draft written discovery, including Requests for Production, Special Interrogatories, Requests for Admission, and Form Interrogatories.
	05/06/2025	0.3 HP	Review case notes concerning factual allegations, claims, and case strategy.
	05/01/2025	0.6 HP	Initial case review, including review of available case materials, factual allegations, and asserted claims.

Gamboa v. Motherly Comfort Home Care

Detailed Billing- Ruby Carrera

Date	Activity	Est. hrs
10/17/2024	Review PAGA notice before submission.	0.5
11/7/2024	Arrange client call with Molly and James on the settlement offer.	0.2
11/12/2024	Call to client about the settlement. No answer.	0.1
11/18/2024	Review OPC's settlement position; strategize on counter	0.3
4/11/2025	Flag discovery deadline; plan next steps	0.2
4/15–16/2025	File review and written case evaluation for Tyler (class size, Wage Order 15, PTO claim, cost vs. recovery)	1.5
4/29/2025	Prepare Gamboa transfer email for reassignment	0.2
5/21/2025	Review Jeffrey's email on OPC's extension and meet-and-confer request; forward to assigned attorney	0.2
TOTAl:		**3.2**

OR FILING- Motherly Comfort (Gamboa)- MFA (Email 1of 2)Gamboa v. Motherly Comfort Home Care

Detailed Billing

Giancarlo A. Recinos:

Date Completed	Task Completed	Attorney	Hours	Hourly Rate	Fees
09/30/26	Email correspondence with administrator re: declaration for the MFA;	GR	0.1	$950.00	$950.00
09/30/26	Review and edit administrator declaration for the MFA	GR	0.2	$950.00	$190.00
10/13/26	Draft/Review and edit proposed order and judgment for MFA	GR	0.5	$950.00	$475.00
10/19/26	Draft/Review and edit attorney declaration in support of MFA	GR	1.1	$950.00	$1,045.00
10/19/26	Draft notice of motion and points and authorities for MFA	GR	4.2	$950.00	$3,990.00
10/19/26	Review and edit costs for MFA	GR	0.1	$950.00	$95.00
10/19/26	Interoffice email correspondence with attorney re draft attorney declaration in support of MFA	GR	0.1	$950.00	$95.00
TOTALS:			**6.3**		**$6,840.00**

Date	Client Matter	Description of Action Taken or Costs Incurred	erson Billir	Start 1
########	Motherly Comfort MAT-240910386988	MPA, Decl., Pltf. Decl., PO; review file; email OC requesting missing data; email team re: missing data.	Conor Gomez	11:02 AM
########	Motherly Comfort MAT-240910386988	Atty. Decl, MPA, PO, Plaintiff Decl.	Conor Gomez	8:45 AM
########	Motherly Comfort MAT-240910386988	Review/Incorporate Lit Team Revisions; send same to OC	Conor Gomez	1:30 PM
########	Motherly Comfort MAT-240910386988	Finalize and prepare to file MPA Packet	Conor Gomez	11:35 AM

End 1	Start 2	End 2	Start 3	End 3	Start 4	End 4	Hours	Rate	Fees
1:00 PM	2:00 PM	3:30 PM					3.5	$575.00	$2,012.50
11:55 AM	1:00 PM	1:15 PM	2:00 PM	5:13 PM	5:23 PM	5:41 PM	7	$575.00	$4,025.00
3:00 PM							1.5	$575.00	$862.50
12:00 PM	1:50 PM	2:00 PM					0.6	$575.00	$345.00
						TOTALS	12.6		$7,245.00