

John G. Yslas (SBN 187324)
john.yslas@wilshirelawfirm.com
Eugene Zinovyev (SBN 267245)
eugene.zinovyev@wilshirelawfirm.com
John Brown (SBN 233605)
john.brown@wilshirelawfirm.com
Gabriella Solé (SBN 346164)
gabriella.sole@wilshirelawfirm.com
Courtney M. Miller (SBN 327850)
courtney.miller@wilshirelawfirm.com
WILSHIRE LAW FIRM, PLC
660 S. Figueroa Street, Sky Lobby
Los Angeles, California 90017
Telephone: (213) 381-9988
Facsimile: (213) 381-9989

Attorneys for Plaintiff

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

AGUILA TOBIAS ACOSTA, individually, and
on behalf of all others similarly situated,

Plaintiff,

v.

LA PLAYA HOTEL GROUP, LLC, a Delaware
limited liability company; HOTEL CARMEL
GROUP, LLC, a Delaware limited liability
company; CASA LOMA BEACH HOTEL, LLC,
a Delaware limited liability company; NORTH
COAST GROUP, LLC, a Delaware limited
liability company; and DOES 1 through 10,
inclusive,

Defendants.

Case No.: 25CV003941

*[Assigned for All Purposes to the Honorable
Thomas W. Wills, Dept. 15]*

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

Final Approval Hearing:

Date: July 10, 2026

Time: 8:30 a.m.

Dept.: 15

Action Filed: September 30, 2024

DECLARATION OF JOHN G. YSLAS

I, John G. Yslas, declare as follows:

1. I am an attorney at law licensed to practice before all of the courts of the State of California. I am a Senior Partner at Wilshire Law Firm, PLC (“WLF” or “Class Counsel”), counsel of record for Plaintiff Aguila Tobias Acosta (“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 or
5 took a major leading role in defending employers on numerous wage and hour class, collective and
6 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 **well over**
14 **\$255 million** in settlements and verdicts which are in the process of being finalized, and with
15 numerous upcoming mediations scheduled. In those and numerous other matters, I have managed
16 and 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 action.
18 Indeed, I recently tried and prevailed in achieving a jury verdict in a certified wage and hour class
19 action in the matter of *Aguilar-Flores v. Javier's – CC LLC*, Los Angeles County Superior Court,
20 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 the
26 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 on

1 wage and hour issues. For example, I published “Headline News: Wal-Mart v. Dukes-Impact on
2 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. Eugene Zinovyev (“Mr. Zinovyev”) is a Junior Partner at WLF. He graduated from
8 the University of California Berkeley with a Bachelor of Arts in Political Economy of Industrial
9 Societies, and received his Juris Doctor from the University of California, San Francisco School
10 of Law in 2009. He has practiced employment and wage and hour law since on both the plaintiff
11 and defense sides. Mr. Zinovyev has tried multiple jury cases to verdict as well as numerous bench
12 trials. He has also briefed published appellate court decisions in both state and federal court. Mr.
13 Zinovyev is admitted to practice before all Federal District Courts in California as well as the 9th
14 Circuit Court of Appeals. He is also a member of the California Employment Lawyers Association.
15 He has mediated and settled dozens of class and representative actions as well as individual civil
16 matters. Mr. Zinovyev’s hourly billing rate is \$950.00.

17 12. John Brown (“Mr. Brown”) is an Associate Attorney at WLF. He was admitted to
18 practice law in the State of California in 2004. Mr. Brown graduated from UC Berkeley with a
19 Bachelor of Arts and received his Juris Doctor from UCLA School of Law. His current practice
20 has been focused on class action employment law. Mr. Brown has participated in dozens of
21 settlements totaling tens of millions of dollars, from the memorandum of understanding and
22 settlement agreement drafting stage through to final approvals from the court. Mr. Brown’s hourly
23 billing rate is \$650.00.

24 13. Gabriella Solé (Ms. Solé) is an Associate Attorney at WLF. She was admitted to
25 practice law in the State of California in 2022. Ms. Solé graduated from University of California,
26 Los Angeles with a Bachelor of Arts in Sociology. She received her Juris Doctor from University
27 of San Francisco, School of Law. During law school, she was a First Year Moot Court Director on
28 the Moot Court Board. Since graduating, her practice has been mainly focused on wage and hour

1 class action litigation. Ms. Solé’s hourly billing rate is \$550.00.

2 14. Courtney M. Miller (“Ms. Miller” is a Settlement Attorney at WLF. She was
3 admitted to practice law in the State of California in 2019. Ms. Miller graduated from the
4 University of California, Santa Cruz, with a Bachelor of Arts in Sociology. Prior to becoming an
5 attorney, Ms. Miller worked at a boutique civil litigation firm for nearly a decade, primarily
6 handling employment matters. She earned her Juris Doctor from Southwestern Law School in
7 2019. Ms. Miller has prosecuted wage and hour class and PAGA actions, almost exclusively, since
8 2020. As a handling attorney, Ms. Miller obtained over \$30 million dollars in settlements on behalf
9 of California employees. Ms. Miller currently bills at an hourly rate of \$700.00.

10 15. WLF’s hourly rates are comparable to those charged by other class action plaintiffs’
11 counsel and the firms defending class actions. WLF’s rates are well within the range of hourly
12 rates that the Los Angeles legal marketplace would compensate counsel for similar services
13 accomplishing similar results. For example, in *Bronshteyn v. State of California*, Los Angeles
14 County Superior Ct. No. 19SMCV00057, Order Granting Plaintiff’s Motion for Statutory
15 Attorneys’ Fees and Costs filed March 30, 2023, an employment action brought by two small law
16 firms (Levy, Vinick, Burrell & Hyams LLP and Law Offices of Wendy Musell), the court found
17 that counsel’s 2022 hourly rates of \$1,100 and \$1,000 per hour were reasonable for the plaintiff’s
18 five senior attorneys, including \$1,000 per hour for the plaintiff’s 23-year lead counsel and \$850
19 per hour for a senior associate. These rates were then augmented by a 1.75 lodestar multiplier and
20 affirmed by the California Court of Appeals. The rates (and multiplier) requested here are well in
21 line with those found reasonable in *Bronshteyn*. In *Tran v. Golden State FC LLC, et al.* (LASC
22 Case No. BC699931), Fee Order filed 4/8/2022, the court found hourly rates of \$1,300 per hour
23 reasonable for plaintiff’s 32-year attorney and \$1,000 per hour reasonable for a 14-year attorney.
24 The multiplier here is even more compelling given Class Counsel represents approximately 544
25 Class Members.

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

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

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

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

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

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 report provides rate information filtered by geographic market, practice type, and timekeeper role. Page 26 reports third-quartile rates for attorneys handling litigation matters in San Francisco and San Jose, which are the primary Northern California legal markets and serve as the dominant rate-setting centers for complex litigation throughout the region. In San Francisco, the dataset shows third-quartile hourly rates of \$1,378 for litigation partners and \$875 for associates. In San Jose, the report shows third-quartile hourly rates of \$1,250 for litigation partners and \$1,030 for associates. The report’s in-depth city analyses for San Francisco and San Jose further confirm that these markets consistently reflect some of the highest billing rates in the country for experienced litigators and serve as the benchmark markets for Northern California legal services. Courts evaluating fee requests in Fresno routinely look to the prevailing rates in the nearest major metropolitan markets as benchmarks when assessing reasonableness. The closest and most relevant comparison markets for Fresno litigation are San Francisco and San Jose, where experienced partners routinely bill well above \$1,200 per hour based on rates actually charged to clients.

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

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

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

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

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

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

the Class Notice and administering the settlement checks; and

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

20. WLF's current lodestar reflects the efficiencies achieved by attorneys experienced in this field with at least **284.8** hours of work resulting in **\$309,395.00** in fees. The chart below shows the calculation of hours spent by each of WLF's attorneys on this case:

Attorney	Hours	Hourly Rate	Total
Gabriella Solé	5.0	\$550.00	\$2,750.00
Courtney M. Miller	12.0	\$700.00	\$8,400.00
John G. Yslas	79.7	\$1,500.00	\$119,550.00
Eugene Zinovyev	188.1	\$950.00	\$178,695.00
TOTAL	284.8		\$309,395.00

21. This amount surpasses the requested fee award of \$300,000.00, resulting in a negative multiplier. Class Counsel's lodestar does not include the time Class Counsel will spend at the Final Approval Hearing and assisting the Settlement Administrator following final approval. Class Counsel dedicated significant resources to this case by dividing the tasks required according to skill level. The hours expended by each attorney were not duplicative and reflect the extensive investigation and analysis that was required to achieve this Settlement. This time could have been spent on other potentially lucrative cases. Class Counsel's lodestar reflects the efficiencies achieved by attorneys experienced in this field. Moreover, Class Counsel has singularly assumed the risk and costs of litigation purely on a contingency basis. And, while Plaintiff is confident in the merits of his 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

1 group of hourly paid workers) could be compensated for their unpaid wages. Consequently, Class
2 Counsel was precluded from focusing on, or taking on, other cases which could have resulted in a
3 larger, and less risky, monetary gain.

4 22. In litigation costs, WLF has spent \$19,668.99 on items such as filing fees, service
5 fees, mediation fees, and expert consultant fees. Since Class Counsel's costs do not exceed the
6 maximum of \$30,000.00, the remaining \$10,331.01 will revert to the Net Settlement Amount. A
7 true and correct copy of WLF's cost reports in this matter is attached hereto as **Exhibit 2**. Plaintiff's
8 total costs include those in WLF's cost reports as well as the anticipated \$60.00 filing fee to file
9 this Motion. All the costs incurred were reasonable and necessary for the prosecution of this case.

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

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

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

15 Executed on June 16, 2026 at Los Angeles, California.

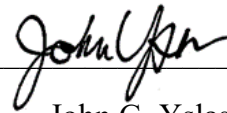
16
17 
18 John G. Yslas

EXHIBIT 1



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analysis of law firm rates,
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Report Editor**Jennifer McIver**

Director, Legal Operations and Industry Insights
Wolters Kluwer ELM Solutions

Lead Data Analysts**Anand Kumar Pathinettam Padian**

Software and Data Engineer
Wolters Kluwer ELM Solutions

Farhan Shaikh

Data Scientist
Wolters Kluwer ELM Solutions

ELM Solutions Creative**David Andrews**

Senior Graphic Designer
Wolters Kluwer ELM Solutions

Contributing Analysts and Authors**Haemi Jung**

Strategic Business Intelligence Manager
Wolters Kluwer ELM Solutions

Manish Sharma

Director, Business Analysis
Wolters Kluwer ELM Solutions

Karen Sekley-Dandrea

Director, Marketing
Wolters Kluwer ELM Solutions

Mat Greener

Project & Program Management Director
Wolters Kluwer ELM Solutions

Executive Sponsor**Brian Jorgenson**

Vice President, Product Management
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Wolters Kluwer ELM Solutions
2929 Allen Pkwy Ste 3300
Houston, TX 77019 United States
ATTN: Marketing
ELMSolutionsSales@wolterskluwer.com

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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.

See clearly. Spend wisely.

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



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



Up to 10% savings on legal spend



Up to 20% improvement in billing guideline compliance



Increased efficiencies free up time for more value-add work

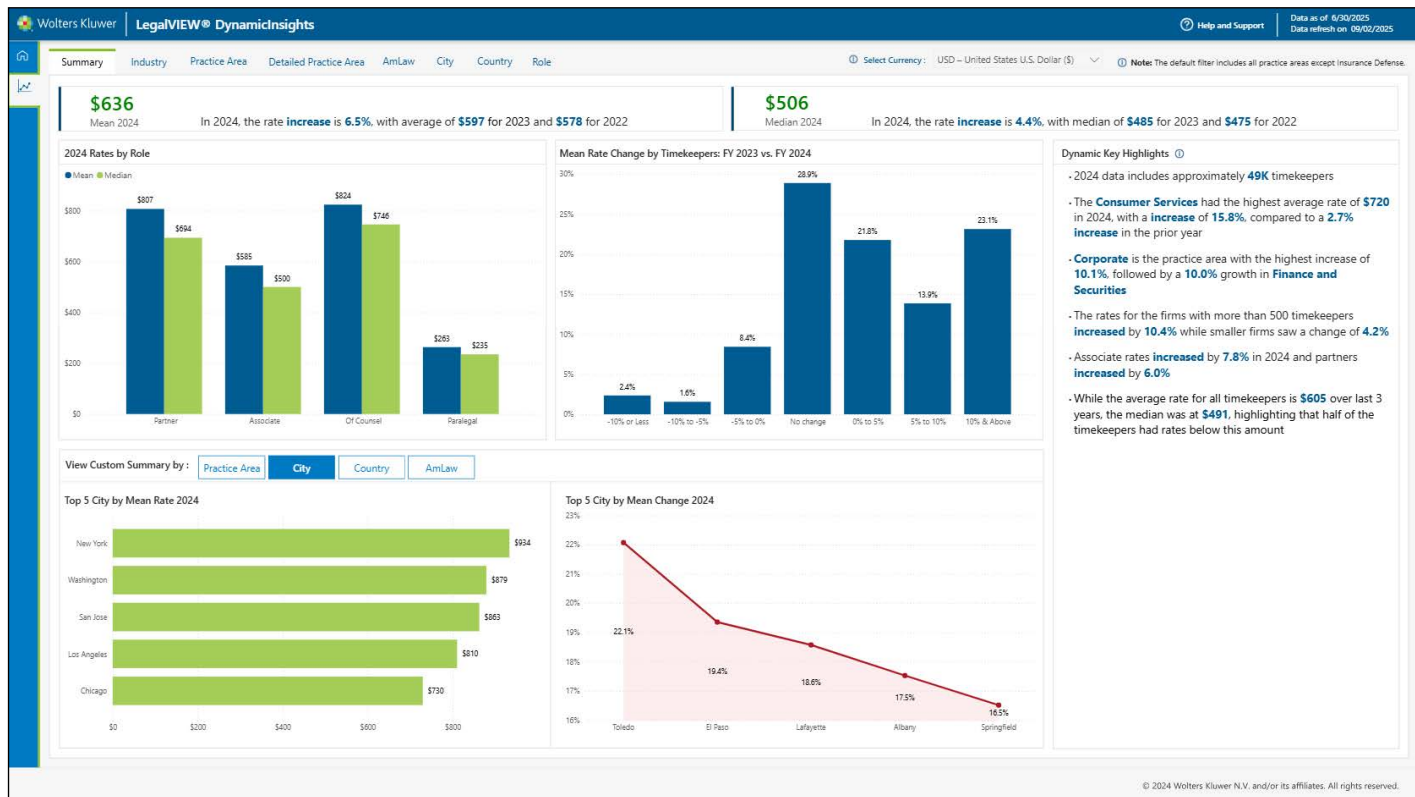
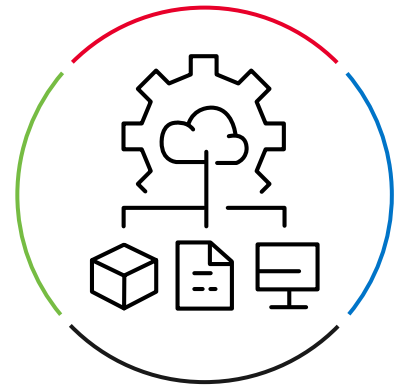


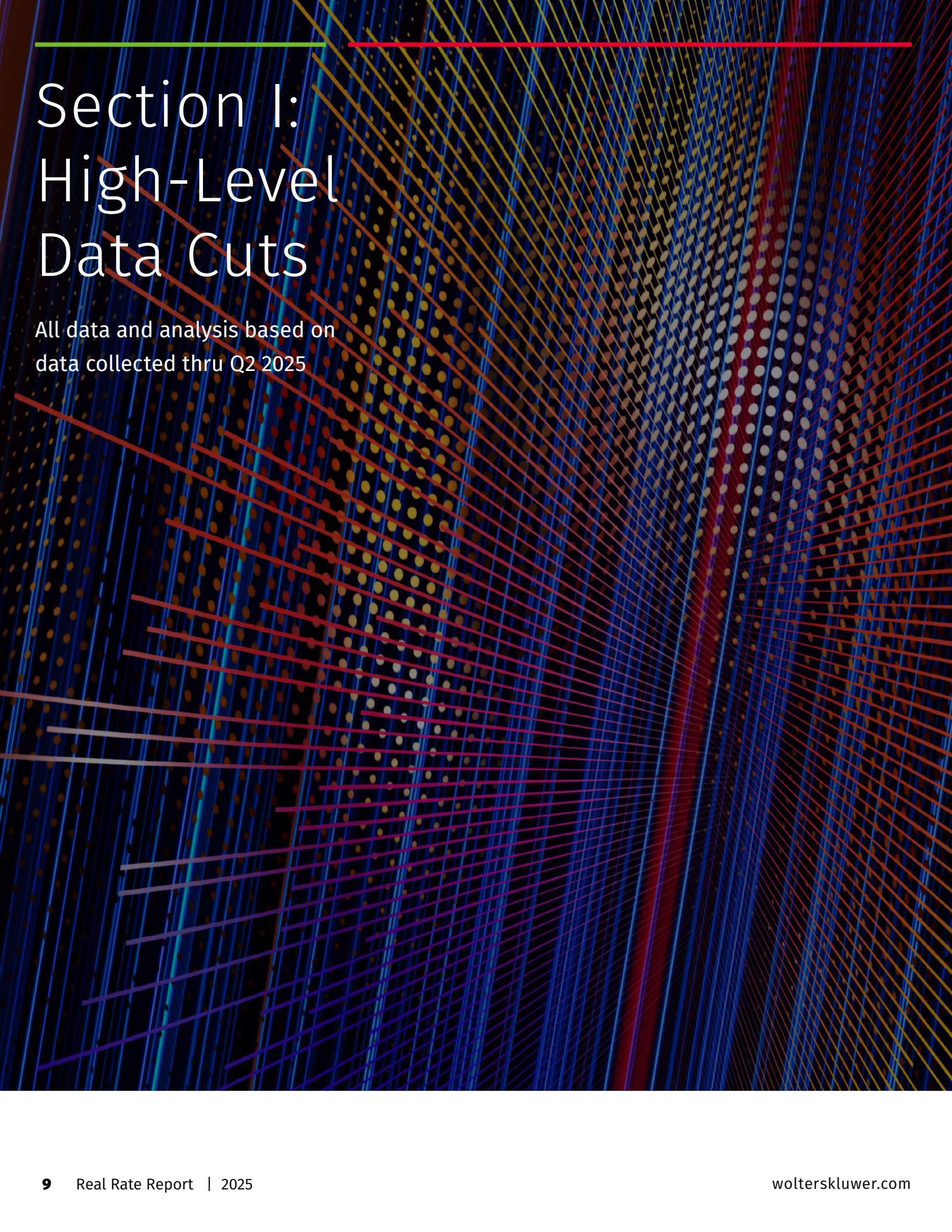
LegalVIEW® DynamicInsights

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

Data that wins awards...and rate negotiations

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





Section I: High-Level Data Cuts

All data and analysis based on
data collected thru Q2 2025

Section I: High-Level Data Cuts

Cities

By Matter Type

2025 Real Rates for Associate and Partner

Trend Analysis - Mean

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



Section II: Industry Analysis

All data and analysis based on
data collected thru Q2 2025

Section II: Industry Analysis

Consumer Services
By Detailed Practice Area and
Matter Type

2025 - Real Rates for Associate and Partner

Trend Analysis - Mean

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

EXHIBIT 2

Expenses Subtotals - Filtered Exp. Type

As of 2026-06-05 09:58:07 Pacific Standard Time/PST • Generated by Jeanette Castillo-Luis

Filtered By
Show: All matters
Matter: ID equals a0LPc00000EF3dg
Expense Type equals E127 — DTF,DTF,E108 — Postage,E102 — Printing

Display Name ↑	Expense Type ↑	Date	Expense: Expense ID	Provider Name	Note	Amount	Reduction Amount	Amount Paid	Amount Due.
Aguila Acosta - Wage & Hour: 8/13/2024	DTF	8/15/2024	E-3236002		Docusign envelope	\$1.89			\$1.89
	Subtotal	Sum				\$1.89	\$0.00	\$0.00	\$1.89
		Count	1						
	E108 — Postage	9/3/2025	E-3277751			\$9.15			\$9.15
		8/15/2025	E-3275590			\$9.15			\$9.15
		11/8/2024	E-3238017			\$8.44			\$8.44
	Subtotal	Sum				\$26.74	\$0.00	\$0.00	\$26.74
		Count	3						
Subtotal		Sum				\$28.63	\$0.00	\$0.00	\$28.63
		Count	4						
Total		Sum				\$28.63	\$0.00	\$0.00	\$28.63
		Count	4						



WILSHIRE
LAW FIRM

Client Cost Report

Account	Type	Date	Num	Name	Matter Display Name	Line Memo	Amount
501500 Cost of Sale : Court Filing Fees	Bill	7/15/2025	92977	Valpro Attorney Services LLC	La Playa Hotel Group LLC (Acosta) - Wage & Hour (Class Action)	92977-Aguila Acosta-Pay Transfer Fee \$435/ \$	\$668.50
501500 Cost of Sale : Court Filing Fees	Bill	7/31/2025	93700	Valpro Attorney Services LLC	La Playa Hotel Group LLC (Acosta) - Wage & Hour (Class Action)	93700-Aguila Acosta-Pay Transfer Fee \$1000.	\$1,235.00
501500 Cost of Sale : Court Filing Fees	Check	12/11/2025	140173	Superior Court of California	La Playa Hotel Group LLC (Acosta) - Wage & Hour (Class Action)	Aguila Acosta - Sanctions	\$50.00
501500 Cost of Sale : Court Filing Fees	C r e d i t Card	7/9/2025	CC073125TA-1081	One Legal LLC	La Playa Hotel Group LLC (Acosta) - Wage & Hour (Class Action)	25739010-256730-Atty Svc for Court Filing-Change of Address-La Playa Hotel Group LLC (Acosta) - Wage & Hour (Class Action)	\$25.75
501500 Cost of Sale : Court Filing Fees	C r e d i t Card	7/10/2025	CC073125TA-1177	One Legal LLC	La Playa Hotel Group LLC (Acosta) - Wage & Hour (Class Action)	25799443-256730-Atty Svc for Court Filing-Stip,Prop Ord,POS-La Playa Hotel Group LLC (Acosta) - Wage & Hour (Class Action)	\$17.50
501500 Cost of Sale : Court Filing Fees	C r e d i t Card	7/10/2025	CC073125TA-1183	One Legal LLC	La Playa Hotel Group LLC (Acosta) - Wage & Hour (Class Action)	25800384-256730-Atty Svc for Court Filing-Stip & Ord-La Playa Hotel Group LLC (Acosta) - Wage & Hour (Class Action)	\$47.43
501500 Cost of Sale : Court Filing Fees	C r e d i t Card	8/15/2025	CC083125TA-1406	One Legal LLC	La Playa Hotel Group LLC (Acosta) - Wage & Hour (Class Action)	26075312-256730-Atty Svc for Court Filing-Stip & Ord-Aguila Acosta-8/13/2024	\$17.50
501500 Cost of Sale : Court Filing Fees	C r e d i t Card	8/25/2025	CC083125TA-2807	One Legal LLC	La Playa Hotel Group LLC (Acosta) - Wage & Hour (Class Action)	26068549-256730-Atty Svc for Court Filing-Notice-Aguila Acosta-8/13/2024	\$21.37
501500 Cost of Sale : Court Filing Fees	C r e d i t Card	9/2/2025	CC093025TA-0921	One Legal LLC	La Playa Hotel Group LLC (Acosta) - Wage & Hour (Class Action)	26082388-256730-Atty Svc for Court Filing-Stip,Prop Ord,POS-Aguila Acosta-8/13/2024	\$21.37
501500 Cost of Sale : Court Filing Fees	C r e d i t Card	10/1/2025	CC103125TA-0461	One Legal LLC	La Playa Hotel Group LLC (Acosta) - Wage & Hour (Class Action)	26392556-256730-Atty Svc for Court Filing-Amended Comp,POS-Aguila Acosta-8/13/2024	\$29.63
501500 Cost of Sale : Court Filing Fees	C r e d i t Card	12/11/2025	CC123125TA-1551	One Legal LLC	La Playa Hotel Group LLC (Acosta) - Wage & Hour (Class Action)	26957421-256730-Atty Svc for Court Filing-Declar,Order,POS-Aguila Acosta-8/13/2024	\$91.58
501500 Cost of Sale : Court Filing Fees	C r e d i t Card	12/12/2025	CC123125TA-1583	One Legal LLC	La Playa Hotel Group LLC (Acosta) - Wage & Hour (Class Action)	26981517-256730-Atty Svc for Court Filing-Remote Appearance-Aguila Acosta-8/13/2024	\$17.50
503300 Cost of Sale : Professional Fees	Bill	7/1/2025	15393	Berger Consulting Group LLC	La Playa Hotel Group LLC (Acosta) - Wage & Hour (Class Action)	15393-La Playa Hotel Group LLC (Acosta)-14.4 hrs of work	\$6,480.00
Total							\$8,723.13

Wilshire Law Firm, PLC
Client Costs Detailed Report
All Transactions

06/05/26

Accrual Basis

Type	Date	Num	Class	Source Name	Memo	Amount	Balance
500000 · COS							
501500 · Court Filing Fees							
Credit C...	10/02/2024	23821601	LaPlayaHotelGrp(Acosta).W&H	One Legal LLC	23821601-256730-Atty Svc for Court Filing-Comp,CCCS,Sum-LaPla...	1,504.09	1,504.09
Credit C...	10/03/2024	23851314	LaPlayaHotelGrp(Acosta).W&H	One Legal LLC	23851314-256730-Atty Svc for Court Filing-Comp,CCCS,Sum-LaPla...	41.30	1,545.39
Credit C...	10/04/2024	23873095	LaPlayaHotelGrp(Acosta).W&H	One Legal LLC	23873095-256730-Atty Svc for Court Filing-POS-LaPlayaHotelGrp(...	22.20	1,567.59
Credit C...	02/18/2025	24736169	LaPlayaHotelGrp(Acosta).W&H	One Legal LLC	24736169-256730-Atty Svc for Court Filing-CMS-LaPlayaHotelGrp(...	24.99	1,592.58
Credit C...	03/25/2025	24982384	LaPlayaHotelGrp(Acosta).W&H	One Legal LLC	24982384-256730-Atty Svc for Court Filing-Related Case-LaPlayaH...	24.99	1,617.57
Total 501500 · Court Filing Fees						1,617.57	1,617.57
502500 · Legal Expenses							
Credit C...	11/12/2024		LaPlayaHotelGrp(Acosta).W&H	Department of Industrial Relations	RM LWDA-CM-1060874-24 (256730) LaPlayaHotelGrp(Acosta).W&H	75.00	75.00
Total 502500 · Legal Expenses						75.00	75.00
502700 · Mediation Fees							
Bill	12/18/2024	2024-265-KB	LaPlayaHotelGrp(Acosta).W&H	Law Offices of Kevin Barnes	2024-265-KB-LaPlayaHotelGrp(Acosta).W&H-Mediation Fee sked 0...	7,500.00	7,500.00
Total 502700 · Mediation Fees						7,500.00	7,500.00
Total 500000 · COS						9,192.57	9,192.57
TOTAL						9,192.57	9,192.57



WILSHIRE
LAW FIRM

Client Cost Report

Account	Type	Date	Num	Name	Matter Display Name	Line Memo	Amount
501500 Cost of Sale : Court Filing Fees	C r e d i t Card	7/9/2025	CC073125TA-1088	One Legal LLC	La Playa Hotel Group LLC (Acosta) - Wage & Hour (PAGA ONLY)	25739086-260974-Atty Svc for Court Filing-Change of Address-La Playa Hotel Group LLC (Acosta) - Wage & Hour (PAGA ONLY)	\$25.75
Total							\$25.75

Wilshire Law Firm, PLC
Client Costs Detailed Report
All Transactions

06/05/26

Accrual Basis

Type	Date	Num	Class	Source Name	Memo	Amount	Balance
500000 · COS							
501500 · Court Filing Fees							
Bill	02/03/2025	87292	LaPlayaHotelGrp(Acosta).PAGA	Valpro Attorney Services, LLC	87292-LaPlayaHotelGrp(Acosta).PAGA-File POS	45.00	45.00
Credit C...	01/22/2025	24541424	LaPlayaHotelGrp(Acosta).PAGA	One Legal LLC	24541424-260974-Atty Svc for Court Filing-Comp,CCCS,Sum-LaPla...	1,507.66	1,552.66
Credit C...	03/25/2025	24982400	LaPlayaHotelGrp(Acosta).PAGA	One Legal LLC	24982400-260974-Atty Svc for Court Filing-Related Case-LaPlayaH...	24.99	1,577.65
Total 501500 · Court Filing Fees						1,577.65	1,577.65
503200 · Process Service Fees							
Bill	02/03/2025	87214	LaPlayaHotelGrp(Acosta).PAGA	Valpro Attorney Services, LLC	87214-LaPlayaHotelGrp(Acosta).PAGA-Servee: La Playa Hotel Group	138.00	138.00
Total 503200 · Process Service Fees						138.00	138.00
Total 500000 · COS						1,715.65	1,715.65
TOTAL						1,715.65	1,715.65