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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF RIVERSIDE

12 **DEAN PARSONS**, individually and on behalf
13 of all others similarly situated,

14 Plaintiff,

15 vs.

16 **LA SIERRA UNIVERSITY**, a California
17 Non-Profit Corporation,

18 Defendant.

Case No.: CVRI2000104

**DECLARATION OF JULIAN HAMMOND
IN SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT AND MOTION
FOR APPROVAL OF ATTORNEYS' FEES
AND COSTS, AND ENHANCEMENT
AWARD FOR CLASS REPRESENTATIVE**

Date: May 19, 2022

Time: 8:30 a.m.

Dept. S302

1 I, Julian Hammond, declare as follows:

2 1. I am a member in good standing of the Bar of the State of California.¹ I am admitted to
3 practice before the courts of the State of California, as well as before the United States District Courts
4 for the Northern, Central, Eastern and Southern Districts of California. I am the principal of my own law
5 firm, HammondLaw, P.C. (“HL”). I am counsel for Dean Parsons (“Plaintiff” or “Class Representative”)
6 and the settlement classes in the above-captioned matter. I make this declaration of my own personal
7 knowledge, including my personal knowledge of the firm’s files relating to this action, and if called upon

8 2. I submit this declaration in support of Plaintiff’s Motion for Final Approval of Class
9 Action Settlement, and Motion for Approval of Attorneys’ Fees and Costs, and Enhancement Award for
10 Class Representative.

11 3. As the lead attorney for the Plaintiff and the Classes in this action, I oversaw all aspects
12 of this case since it was filed. This declaration summarizes the nature and history of the litigation, the
13 time reasonably spent by HL attorneys, and the costs incurred. The Declaration also provides support for
14 the hourly rates claimed by my firm. A copy of my firm’s resume is attached as Exhibit 1.

15 4. I have no knowledge of the existence of any conflict of interest between Class Counsel
16 and the Plaintiff, on the one hand, and any members of the Classes, on the other hand.

17 **PERCENTAGE OF THE FUND ANALYSIS**

18 5. Class Counsel seek attorneys’ fees of 1/3 of the \$578,220 Gross Settlement (*i.e.*,
19 \$192,740). This amount is reasonable considering Class Counsel’s extensive experience in wage and
20 hour class actions, the work done by Class Counsel on this case, the manner in which counsel effectuated
21 this result to ensure prompt payment to the Classes by negotiating an excellent Settlement less than a
22 year after the filing of the Complaint, the risk of non-recovery after substantial investment of time and
23 resources undertaken by Class Counsel, and the continued time and expense that Class Counsel will incur
24 by overseeing the administration of the settlement fund should this Court grant approval, or should any
25 Class Member appeal this Court’s Final Approval Order.

26 6. Class Counsel’s fee request is justified in light of the fact that 1/3 of the common fund is
27 a percentage that California courts routinely award in common fund settlements. Class Counsel has been
28 awarded approximately one-third of the common fund in similar wage and hour class actions including

¹ I am also licensed to practice law in the state of New York and the state of Washington, and am admitted to practice as a Barrister-at-Law in both the New South Wales and Victorian Supreme Courts of Australia.

1 *Chindamo v. Chapman University*, Case No. 30-2020-01147814-CU-OE-CXC (Orange County Superior
2 Court) (April 15, 2022) (approving fees of 1/3 of \$1,150,000 wage and hour class action); *Sweetland-Gil*
3 *v. University of the Pacific*, Case No. STK-CV-UOE-2019-0014682 (San Joaquin County Superior
4 Court) (March 4, 2022) (approving fees of 1/3 of \$1,800,000 wage and hour class action); *Senese v.*
5 *University of San Diego*, Case No. 37-2019-00047124-CU-OE-CTL (San Diego County Superior Court)
6 (February 8, 2022) (approving fees of 1/3 of \$3,892,750 wage and hour class action); *Solis et al. v.*
7 *Concordia University Irvine*, Case No. 30-2019-01114998-CU-OE-CXC (Orange County Superior
8 Court) (February 3, 2022) (approving fees of 1/3 of a \$890,000 wage and hour class action); *McCoy et*
9 *al. v. Legacy Education LLC*, Case No. 19STCV2792 (Los Angeles County Superior Court) (November
10 15, 2021) (approving fees of 1/3 of a \$76,000 wage and hour representative action); *Merlan v. Alliant*
11 *International University*, Case No. 37-2019-00064053-CU- OE-CTL (San Diego County Superior Court)
12 (November 2, 2021) (approving fees of 1/3 of a \$711,500 wage and hour class action as “not out of line
13 with class action fee awards calculated using the percentage-of-the-benefit method”); *Stupar et al. v*
14 *University of La Verne*, Los Angeles Superior Court) (October 14, 2021) (approving fees of 33% in
15 \$2,450,000 wage and hour class action); *Normand v. Loyola Marymount University*, Case No.
16 19STCV17953 (Los Angeles Superior Court) (September 9, 2021) (approving fees of 33% in \$3,400,000
17 wage and hour class action); *Veal v Point Loma Nazarene University*, Case No. 37-2019-00064165-CU-
18 OE-CTL (San Diego Superior Court) (August 27, 2021)(approving fees of 33.33% in \$711,000 wage and
19 hour class action); *Pillow et al. v. Pepperdine University*, Case No. 19STCV33162 (Los Angeles Superior
20 Court)(July 28, 2021) (approving fees of 33% in \$940,000 wage and hour class action); *Moore et al. v.*
21 *Notre Dame De Namur University*, Case No. 19-CIV-04765 (San Mateo County Superior Court) (July 1,
22 2021) (approving fees of 33% in \$882,880 wage and hour class action); *Peng v. The President and Board*
23 *of Trustees of Santa Clara College*, Case No. 19CV348190 (Santa Clara County Superior Court) (April
24 21, 2021) (approving fees of 33% in \$1,900,000 wage and hour class action); *Morse v Fresno Pacific*
25 *University*, Case No. 19-CV-04350 (Merced County Superior Court) (April 6, 2021) (approving fees of
26 33% in \$1,534,725 wage and hour class action); *Miner, et al. v. ITT Educational Services, Inc.*, Case No.
27 3:16-cv-04827-VC (N.D. Cal.) (March 19, 2021) (approving fees of 33% in a \$5.2 million wage and hour
28 class action); *Granberry v. Azusa Pacific University*, Case No. 19STCV28949 (Los Angeles County
Superior Court) (March 5, 2021) (approving fees of 33% in a \$1,112,100 wage and hour class action);
Ott v. California Baptist University, Case No. RIC1904830 (Riverside County Superior Court) (January
26, 2021) (33% fee award in \$700,000 wage and hour class action); *Pereltsvaig v. Cartus Corp.*, Case
No. 19CV348335 (Santa Clara County Superior Court) (Jan. 13, 2021) (approving fees of 1/3 in a

1 \$300,000 wage and hour class action); *Pereltsvaig v. Leland Stanford Jr. University*, Case No. 17-CV-
2 311521 (Cal. Sup. Ct. Santa Clara Cnty. Jan. 4, 2019) (approving fee of 33% in \$886,890 wage and hour
3 class action); and other wage and hour class actions.

4 7. In my professional experience, percentage-of-the-fund awards are frequently used as the
5 basis for awarding successful plaintiffs' attorneys their fees in common fund settlements. My
6 understanding is that the courts' bases for favoring percentage-of-the-fund awards in common fund
7 settlements include (1) fairly compensating the attorneys based on the benefits brought to the class; (2)
8 providing an incentive for counsel to efficiently litigate cases, rather than spend excessive hours to
9 prolong litigation and justify a higher lodestar; (3) providing incentive for settlement, which is
10 particularly preferred in class actions; (4) equitably spreading the attorneys' fees among class members
11 who benefit from their work at a rate that closely mirrors percentages paid on individual contingency fees
12 cases; and (5) relieving some of the workload on an overtaxed judicial system while still providing
13 fairness to the class through judicial oversight of class settlements.

14 8. Class Counsel's fee request is justified under these factors. Class Counsel agreed to
15 represent Plaintiff on behalf of himself and the putative Classes on a contingency basis, and further agreed
16 to advance all litigation costs. Class Counsel also took on this case despite the known risks associated
17 with Plaintiff's claims and the class allegations, and the unpredictable risks that are common to most
18 complex employment class actions that develop only over the course of the litigation. Such unpredictable
19 factors include, of course, the possibilities of changes or developments in the law and actions by
20 defendants or defense counsel. Despite all of this, Class Counsel were able to obtain a very favorable
21 settlement in a short time after filing this lawsuit.

22 9. The requested percentage of the distribution is consistent with (or lower than) the fee that
23 my firm would have expected if we had negotiated individual retainer agreements with each Class
24 Member. Such an award ensures that we can receive an appropriate fee for the risks undertaken by our
25 firm and the benefit conferred to the Class, particularly when it would be impossible *ex ante* to enter a
26 fair fee arrangement with all the members of the Class.

27 **LODESTAR-MULTIPLIER ANALYSIS**

28 10. Plaintiff's Counsel has calculated our combined lodestar amount (reasonable hours times
reasonable hourly rates) for which compensation is requested, to be \$185,073 through April 18, 2022.
Plaintiff's requested lodestar amount represents approximately 271 hours of work by attorneys and other
staff who worked on this case, billed at regular, established billing rates. Plaintiff's Counsel
contemporaneous billing records are attached hereto as Exhibit 2.

1 **A. Work Performed by Plaintiff's Counsel**

2 11. In this section of the declaration, I provide a summary of the general tasks performed by
3 Plaintiff's Counsel at each stage of the litigation in order to assist the Court in evaluating the
4 reasonableness of the hours submitted by Plaintiff's Counsel. I have divided the time spent litigating this
5 case into four separate phases. Phase I consisted of pre-filing work including fact investigation, case
6 analysis, drafting of pleadings, and case management related matters. Phase II consists of discovery and
7 preparation for mediation. Phase III consisted of attendance at mediation and settlement negotiations up
8 until the Settlement Agreement had been signed. Phase IV has consisted of post-settlement motions
(preliminary and final approval) and notice administration.

9 **PHASE I WORK**

10 12. Phase I consisted of pre-filing fact investigation and case analysis, drafting of pleadings
11 throughout the litigation, and matters related to court hearings. The total time expended by Plaintiff's
12 Counsel on these tasks was 51.1 hours for a lodestar of \$35,136, as follows:

	Hammond	Cherniak	Brandler	Total
Fact Investigation	1.0	0.6	2.3	3.9
Pleadings	10.9	19.8	6.5	37.2
Court Hearings	0.8	8.5	0.7	10.0
	12.7	28.9	9.5	51.1

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16 13. The "Fact Investigation" work included researching and analyzing Defendant's policies
17 applicable to adjunct instructors; reviewing documents gathered from Defendant's website and/or
18 provided by Plaintiff including wage statements, handbooks, course contracts, course assignments, and
19 pay stubs; and corresponding with Plaintiff to conduct further factual investigation and obtain
20 information necessary for the Complaint.

21 14. The "Pleadings" work included strategizing/discussing and drafting the PAGA Notice, the
22 initial Complaint, First Amended Complaint, Second Amended Complaint, and Amended PAGA Notice;
23 reviewing Defendant's Answers to Plaintiff's complaints; and research and efforts related to completing
24 service of process on the Defendant during the COVID-19 pandemic when Defendant's campus was
shuttered.

25 15. The "Court Hearing" work includes corresponding with Defendant and with the Court on
26 conference dates; drafting emails, statements, and stipulations related to court hearings; reviewing the
27 Court's telephonic appearance policy; and checking the Court's docket over the course of the litigation
28 to keep abreast of the proceedings/schedule/orders.

PHASE II WORK

16. Phase II consisted of discovery and mediation preparation. During this phase, Plaintiff’s Counsel engaged in informal discovery; drafted an online survey and sent it to Class Members; and reviewed survey responses. Plaintiff’s Counsel also drafted a detailed mediation brief supported by carefully selected excerpts of evidence provided by Defendant and gathered by Plaintiff’s Counsel; and closely reviewed Defendant’s mediation brief. The total time expended by Plaintiff’s Counsel on these tasks was 76.7 hours for a lodestar of \$53,888.50, as follows:

	Hammond	Cherniak	Brandler	Barnes	Total
Discovery / Data Analysis	1.4	8.8	0.7	-	10.9
Mediation Prep	4.6	9.4	12.8	39.0	65.8
	6.0	18.2	13.5	39.0	76.7

17. The “Discovery/ Data Analysis” work included obtaining and analyzing informal discovery; meeting and conferring with Defendant regarding production and data points; and reviewing and analyzing Defendant’s production including: (a) exemplar Contract Teaching Agreements; (b) Plaintiff’s personnel file; (c) exemplar wage statements; (d) LSU’s Faculty Handbook; (e) payroll calendars; (f) a letter to adjuncts announcing their reclassification as hourly non-exempt and new time reporting and meal and rest break policies; (g) class scheduling data for the Adjunct Class Period, including the number of terms taught by Adjunct CMs, the number of courses taught by Adjunct CMs, and class length; and (h) LSU’s COVID expense reimbursement policy. Plaintiff’s Counsel had the data analyzed in order to ascertain the class sizes, number of courses and classes taught by CMs, the number of wage statements issued to CMs, CMs’ average hourly rate and average daily rate, number of classes that were 3.5 hours or 5 hours long, and other relevant data.

18. The “Mediation Preparation” work included combing through the factual record to obtain support for Plaintiff’s arguments including a detailed rebuttal of Defendant’s contention that Plaintiff’s wage and hour claims are barred by the “ministerial exception”; reviewing Defendant’s detailed mediation brief; performing an online survey of CMs regarding unpaid wage claims; drafting a 13-page single spaced mediation brief with a detailed legal and factual analysis of Plaintiff’s claims and a detailed damages model; selecting and assembling supporting 19 supporting exhibits; and discussing the scope of the case and mediation strategy with Ms. Brandler and Mr. Barnes.

PHASE III WORK

19. Phase III consisted of the mediation and settlement negotiations. During this phase, Plaintiff's Counsel prepared for and attended the full-day mediation with Lou Marlin; and negotiated and finalized the long-form Settlement Agreement and Notice.

20. The total time expended by Plaintiff's Counsel on these tasks was 37.3 hours for a lodestar of \$29,936 as follows:

	Hammond	Cherniak	Brandler	Barnes	Total
Mediation Attendance	8.50	-	6.50	7.40	22.40
Post Mediation Settlement	0.80	9.30	4.80	-	14.90
	9.30	9.30	11.30	7.40	37.30

21. The "Mediation Attendance" work included attending the full-day mediation and preparation done immediately before the mediation began.

22. The "Post Mediation Settlement" work included negotiating the Memorandum of Understanding, long form settlement, the escalator clauses, the class definitions and class periods, Releases, and other key settlement terms; and reviewing, editing and finalizing the Settlement Agreement, and the Class Notice.

PHASE IV WORK

23. Phase IV consisted of the obtaining approval of the Settlement and overseeing the administration of Notice to the Class. During this phase, Plaintiff's Counsel drafted a detailed preliminary approval motion and final approval motion; and oversaw the administration of the Class Notice. The total time expended by Plaintiff's Counsel on these tasks was 106.3 hours for a lodestar of \$69,113, as follows:

	Hammond	Cherniak	Brandler	Barnes	Total
Settlement Approval	0.60	56.70	2.00	27.00	86.30
Class Notice	3.90	14.00	2.10	-	20.00
	4.50	70.70	4.10	27.00	106.30

24. The "Settlement Approval" work included drafting the detailed preliminary approval motion consisting of a 22-page brief and a 26-page supporting declaration with an in-depth analysis of Plaintiff's claims, the underlying allegations, Defendant's defenses, the strength of each defense, and maximum and realistic liability on each claim; drafting detailed supplemental briefing, declarations, amending the Settlement Agreement, and revising the Class Notice as directed by the Court in its tentative ruling; drafting the final approval motion, fees motion, and the instant declaration; assisting

1 Settlement Administrator with drafting its declaration; and compiling time and costs for submitting to
2 the Court.

3 25. "Class Notice" included reviewing and approving the Notice and the settlement
4 calculations prior to mailing; meeting and conferring with Defendant and the Settlement Administrator
5 regarding the increased class size and second notice administration; obtaining a Court order continuing
6 the final approval hearing date in order to complete administration of the second notice; reviewing the
7 weekly reports circulated by the Settlement Administrator; and reviewing responses submitted by Class
8 Members.

9 **PLAINTIFF'S COUNSEL'S REASONABLE HOURLY RATE**

10 26. The following paragraphs summarize each attorney's qualifications, some of their
11 principal contributions to the case, and their hourly rate:

12 **a. Julian Hammond**

13 27. *Qualifications and Experience.* I have been practicing law since 2000. I was admitted as
14 a Solicitor in New South Wales in 2000. In 2002, I was admitted to the New York State Bar, and was
15 also admitted as a Barrister in New South Wales. As a Barrister, from approximately 2002 to 2008, I
16 first-chaired four cases and second-chaired at least 10 cases. I also advised high profile institutional
17 clients and advised and represented individuals and groups of individuals in a wide variety of matters,
18 including pharmaceutical product liability, oil-spill, eminent domain and other real estate matters, and
19 breach of contract. Thereafter, and for the majority of my career I have represented plaintiffs in
20 employment and consumer cases. From 2008 until 2010, I worked with Ackermann & Tilajef, P.C. in
21 Los Angeles where I worked with employees in a number of wage and hour class actions, as well as small
22 groups of clients in sexual discrimination, FMLA discrimination, retaliation and similar cases.

23 28. In 2010 I founded my firm. Since the founding of my firm, I have acted as lead or co-
24 lead counsel in over 70 employment and consumer class actions in state and federal courts in California
25 and Washington state. I have represented employees across a variety of industries, including outside
26 salespersons in the liquor distribution industry and in the photocopier industry, securing settlements
27 against major players in both industries for violations of Labor Code § 2802 and securing significant
28 increases in the amount of money employees received for expense reimbursement. I also represented
thousands of truck drivers in California, securing settlements and compensation changes going forward
against the largest trucking companies in the United States for unpaid wages and premium pay. I have
also obtained significant settlements for pet groomers, fitness instructors, and most recently, adjunct
instructors.

1 29. My firm was also the first firm in the country to bring cases and secure settlements
2 pursuant to the Automatic Renewal Law, California Business & Professions Code §§ 17600 *et seq.*
3 (“ARL”) and the Unfair Competition law, California Business & Professions Code §§ 17200 *et seq.*
4 (“UCL”). As lead or co-lead counsel we secured the largest settlement thus far under the ARL and UCL
5 in *Siciliano, et al. v. Apple, Inc.*, Case No. 1:13-CV-257676 (Santa Clara Cnty. Super. Ct., November 5,
6 2018) (\$16,500,000 settlement on behalf of 3.9 million consumers). We also secured settlements under
7 the ARL and the UCL in *Gargir v. SeaWorld Inc.*, Case No. 37-2015-00008175-CU-MC-CTL (Cal. Sup.
8 Ct. San Diego Cty.) (approving HammondLaw as co-class counsel in \$500,000 settlement on behalf of
9 88,000 subscribers to SeaWorld’s annual park passes); *Davis v. Birchbox, Inc.*, Case No. 3:15-cv-00498-
10 BEN-BGS (approving HammondLaw as co-class counsel in \$1,572,000 settlement on behalf of 149,000
11 subscribers to Birchbox’s memberships); *Goldman v. LifeLock, Inc.* Case No. 1-15-cv-276235
12 (approving HammondLaw as co-class counsel in \$2,500,000 settlement on behalf of 300,000 California
13 subscribers to Lifelock’s identity protection programs); and *Kruger v. Kiwi Crate, Inc.* Case No. 1-13-
14 cv-254550 (Cal. Sup. Ct. Santa Clara Cty.) (approving HammondLaw as class counsel in \$108,000
15 settlement on behalf of 5,400 California subscribers to Kiwi Crate’s subscriptions).

16 30. My firm was also on the Executive Committee in the MDL case titled *In re Ashley*
17 *Madison Customer Data Security Breach Litigation*, Case No. MDL 2669 (E.D. Mis. Dec. 9, 2015)
18 (\$11.2 million claims-made settlement on behalf of approximately 39 million Ashley Madison users
19 alleging privacy violation).

20 31. Since 2016, my firm has been the leader in prosecuting adjunct instructor cases in the
21 state. My firm has successfully recovered over \$35 million in wages and statutory and civil penalties on
22 behalf of adjunct instructors in 22 actions. My firm also recently litigated one adjunct class action all the
23 way through to trial in which the Class prevailed. *Gola v. University of San Francisco*, No. CGC-18-
24 565018 (Cal. Sup. Ct. San Francisco Cnty. March 3, 2021).

25 32. *Billing Rate.* For all of my work at my firm, and for the entire period since I founded the
26 law firm, my time has been billed at standard rates established by the firm based on billing rates for
27 lawyers engaged in complex litigation in California, and nationally, and on my experience with court-
28 awarded and court-approved fees in my own, and comparable firms’ cases. My current billing rate for
this case is \$870 per hour. Based on my knowledge of rates charged by other experienced attorneys
involved in complex litigation, I believe that rate to be at the prevailing market rates for attorneys of
comparable skill and experience in such matters.

1 33. *Significant Responsibilities on this Case.* As the principal of HammondLaw I managed
2 every aspect of the litigation and oversaw case development and strategy. I supervised, edited, and
3 approved Plaintiff's pleadings, mediation brief, Settlement Agreement, and approval motions. I also
4 oversaw and actively participated in the discovery process including the analysis of the data produced by
5 Defendant in informal discovery; and was the lead negotiator in the full-day mediation.

6 **b. Adrian Barnes**

7 34. *Qualifications and Experience.* Mr. Barnes graduated from the University of California,
8 Berkeley, in 2001, and from Columbia Law School, in 2007, where he was a member of the *Columbia*
9 *Law Review* and received the Emil Schlesinger Labor Law Prize. Since graduating from law school, Mr.
10 Barnes has spent the majority of his career representing the interests of employees and union members
11 in labor and employment cases.

12 35. *Billing Rate.* Mr. Barnes' time on this case is billed at an hourly rate of \$725. Surveys I
13 have reviewed and experts I have consulted demonstrate to me that this rate is similar to rates charged by
14 comparable attorneys for similar class action work and complex litigation.

15 36. *Significant Responsibilities on this Case.* All of Mr. Barnes time in this case was spent
16 drafting the mediation brief, attending the mediation, and preparing the motion for preliminary approval.

17 **c. Polina Brandler**

18 37. *Qualifications and Experience.* Polina Brandler received her B.A. in history cum laude
19 from the Macaulay Honors College at the City University of New York in 2005, and her J.D. from the
20 Benjamin N. Cardozo School of law in 2009. While in law school, Ms. Brandler was an intern for the
21 Honorable Sandra L. Townes of the Southern District of New York. After graduation, she clerked for the
22 Honorable Anita H. Dymant of the Appellate Division of the Los Angeles Superior Court from 2009 to
23 2012. During her time at HL, which is approximately the last decade, Ms. Brandler's practice has focused
24 on wage and hour and consumer class actions. Ms. Brandler has been responsible for all facets of wage
25 and hour actions, from pre-filing investigation, discovery, and motion practice, appeal and/or settlement
26 approval. Ms. Brandler has been approved as class counsel on multiple wage and hour class and
27 representative actions, including several adjunct instructor wage and hour cases.

28 38. *Billing Rate.* Ms. Brandler's time on this case is billed at \$695 per hour. Surveys I have
reviewed and experts I have consulted demonstrate to me that this rate is similar to the rates charged by
comparable attorneys for class action work and complex litigation.

1 39. *Significant Responsibilities on this Case.* Ms. Brandler was assigned responsibilities in
2 almost all aspects of the case, including drafting and/or reviewing drafts from other attorneys of the
3 PAGA notice, complaints, mediation brief, motions and supporting declarations.

4 **d. Ari Cherniak**

5 40. *Qualifications and Experience.* Mr. Cherniak received his B.S. in Philosophy cum laude
6 from Towson University in 2007, and his J.D. from Tulane Law School in 2011. Since joining. HL in
7 2012, Mr. Cherniak’s practice has focused on wage and hour and consumer class actions. Mr. Cherniak
8 served as class counsel on the firm’s wage and hour class and representative actions, including several
9 adjunct instructor wage and hour cases.

10 41. *Billing Rate.* Mr. Cherniak’s time on this case is billed at \$605 per hour. Surveys I have
11 reviewed and experts I have consulted demonstrate to me that this rate is similar to rates charged by
12 comparable attorneys for similar class action work and complex litigation.

13 42. *Significant Responsibilities on this Case.* Mr. Cherniak was assigned responsibilities in
14 almost all aspects of the case, including preparing drafts of complaints, reviewing / editing the motions
15 for preliminary and final approval, reviewing / editing the Settlement Agreement, drafting CMC
16 statements, stipulations, and drafting/ reviewing the mediation brief. Mr. Cherniak also oversaw the case
17 calendar.

18 **HOURS SPENT ON LITIGATION ARE REASONABLE**

19 43. I was responsible for managing Plaintiff’s Counsel’s work. In managing the case, I made
20 every effort to litigate this matter efficiently by coordinating the work of attorneys, minimizing
21 duplication, and assigning tasks in a time and cost-efficient manner, based on the timekeepers’ experience
22 levels and talents. In particular, I assigned most of the day-to-day work associated with drafting
23 pleadings, briefs, and motions, to attorneys with lower billing rate, with oversight by me.

24 44. In my professional judgment, there can be no question that the involvement of each of the
25 attorneys in the case was necessary to provide adequate and effective representation to Plaintiff in this
26 complex litigation. The varied types of abilities and levels of experience of the attorneys who worked on
27 this case allowed us to delegate tasks efficiently and provide skilled coverage. The instances where
28 multiple attorneys contributed to the same task (for example, in contributing to the mediation brief) were,
in my professional judgment, necessary to ensure coordination and accuracy, and to capture the particular
expertise of each attorney.

45. I reviewed the time records of all the timekeepers who billed to this matter and exercised
billing judgment to delete and/or reduce certain time entries based on my experience in similar lodestar

1 calculation and billing judgment determinations in many other complex cases, and based on my
2 knowledge of the tasks assigned to each attorney in this case and how he or she approached each task.

3 46. In sum, it is my opinion and professional judgment that the hours spent by Plaintiff's
4 Counsel were both reasonable and necessary to the effective representation of our clients and the Class.
5 My opinion is informed by my involvement as lead-counsel, over a decade of experience in litigating
6 many large class actions in which, similar to this case, it was necessary to field and manage a team of
7 lawyers, with different levels of experience and types of expertise, to carry out the work required by the
8 case.

9 **REASONABLE HOURLY RATES**

10 47. HL is requesting that its time on this case be compensated on a percentage-of-the-fund
11 basis, with a lodestar-multiplier cross check in which Plaintiff's Counsel's fees are viewed in light of the
12 prevailing market rates. Based on my knowledge of market billing rates and practices and surveys, I
13 believe that our hourly billing rates shown in the Table immediately below are consistent with the rates
14 charged by comparable attorneys for similar class action work and complex litigation; and that the rates
15 we charge are reasonable for attorneys of our experience, reputation, and expertise practicing complex
16 and class action litigation.

17 HammondLaw, P.C. Hourly Rates		
18 Attorney/Timekeeper	19 Year Admitted	20 Rate
21 Julian Hammond, Principal	2000	\$870
22 Adrian Barnes, Counsel	2007	\$725
23 Polina Brandler, Associate	2010	\$695
24 Ari Cherniak, Associate	2011	\$605

25 48. HL's 2022 hourly rates have been approved in hourly rates have been approved in
26 *Chindamo v. Chapman University*, Case No. 30-2020-01147814-CU-OE-CXC (Orange County Superior
27 Court) (April 15, 2022); *Sweetland-Gil v. University of the Pacific*, Case No. STK-CV-UOE-2019-
28 0014682 (San Joaquin County Superior Court) (March 4, 2022); and *Senese v. University of San Diego*,
Case No. 37-2019-00047124-CU-OE-CTL (San Diego County Superior Court) (February 8, 2022).

49. Slightly lower earlier versions of HL's rates have been approved in *Stupar et al. v.*
University of La Verne, Case No. 19STCV333363 (Los Angeles County Superior Court)(October 14,
2021)(approving HL's 2021 hourly rates as reasonable, and within the range of market rates that

1 attorneys with similar levels of skill, experience and reputation in the Los Angeles Area charge for
2 handling matters of similar complexity); *Veal v. Point Loma Nazarene University*, Case No. 37-2019-
3 00064165-CU-OE-CTL (San Diego County Superior Court) (August 27, 2021) (same); *Pillow et al. v.*
4 *Pepperdine University*, Case No. 19STCV33162 (Los Angeles County Superior Court) (July 28,
5 2021)(same); *Mooiman et al. v. Saint Mary's College of California*, Case No. C19-02092 (Contra Costa
6 County Superior Court) (June 10, 2021)(same); *Peng v. The President and Board of Trustees of Santa*
7 *Clara College*, Case No. 19CV348190 (Santa Clara County Superior Court) (April 21, 2021) (awarding
8 2.75 multiplier to my firm's lodestar calculated based on HL's 2020 hourly rates); *Morse v. Fresno*
9 *Pacific University*, Case No. 19-CV-04350 (Merced County Superior Court) (April 6, 2021) (approving
10 HL's 2020 hourly rates as reasonable, and within the range of market rates that attorneys with similar
11 levels of skill, experience and reputation for handling matters of similar complexity); *Granberry v. Azusa*
12 *Pacific University*, Case No. 19STCV28949 (Los Angeles County Superior Court)(March 5, 2021);
13 (approving 1.77 multiplier to my firm's lodestar calculated using HL's 2020 hourly rates); *Ott v.*
14 *California Baptist University*, Case No. RIC1904830 (Riverside County Superior Court)(January 26,
15 2021)(approving HL's 2020 hourly rates as reasonable); and *Pereltsvaig v. Cartus Corp.*, Case
16 No. 19CV348335 (Santa Clara County Superior Court)(Jan. 13, 2021) (approving 1.44 multiplier to my
17 firm's lodestar calculated using HL's 2020 hourly rates).

18 50. My firm's slightly lower 2021 hourly rates are also supported by a declaration of Richard
19 S. Pearl filed by my firm by my firm on October 12, 2021 in *Fisher v MoneyGram International, Inc.*,
20 Case no. RG19009280 (Alameda County Superior Court), and attached as **Exhibit 3**. Mr. Pearl is a
21 renowned expert on California attorneys' fees law and practice, and his declaration provides authoritative
22 evidence that HammondLaw's requested hourly rates, which have increased only slightly since 2021,
23 are well within the range of reasonable in the Los Angeles market.

24 51. HammondLaw's 2019 (and earlier) rates have been approved in *Miner, et al. v. ITT*
25 *Educational Services, Inc.*, Case No. 3:16-cv-04827-VC (N.D. Cal. March 19, 2021)(Approving HL's
26 2019 hourly rates as reasonable); *Morrison v. American National Red Cross*, Case No. 19-cv-02855-
27 HSG (N.D. Cal., Jan. 8, 2021) (approving HL's 2019 hourly rates as "reasonable and in line with
28 prevailing rates in this district for personnel of comparable experience, skill, and reputation"); *Stempien*
v. DeVry University, Inc., Case No. RG19002623 (Alameda County Superior Court)(June 30, 2020)
(approving fees based on 2019 hourly rates without raising any concerns as to the listed hourly rates);
Hogue v. YRC, Case No. 5:16-cv-01338 (C.D. Cal. June 24, 2019) (approving HammondLaw's 2019
hourly rates); *Pereltsvaig v. The Board of Trustees of the Leland Stanford Jr. University*, Case No.

1 17CV311521 (Santa Clara County Superior Court) (Jan. 9, 2019) (approving requested fees based on
 2 2018 hourly rates without raising any concerns as to the listed hourly rates); *Siciliano v. Apple, Inc.*, Case
 3 No. 13-1-cv-257676 (Santa Clara County Superior Court) (Nov. 2, 2018) (approving HL’s 2018 hourly
 4 rates) as reasonable); *Moss v. USF Reddaway, Inc.*, Case No. 5:15-cv-01541 (C.D. Cal. July 25, 2018)
 5 (finding “[t]he attorneys and paralegals who worked on this matter have substantial experience in
 6 complex employment litigation” and approving HammondLaw attorneys’ 2018 hourly
 7 rates); *Maldonado v. Heavy Weight Transport, Inc.*, Case No. 2:16-cv-08838-CAS (C.D. Cal. Dec. 11,
 8 2017) (approving HL’s 2017 hourly rates); and *Hillman v. Kaplan*, Case No. 34-2017-00208078
 9 (Sacramento County Superior Court) (Dec. 7, 2017) (approving fees based on 2017 hourly rates without
 10 raising any concerns as to the listed hourly rates).

11 52. Mr. Barnes’ lower 2021 hourly rate is discussed in the Pearl Decl., filed herewith, and
 12 was approved by the Courts in *Vallimont v. Westat, Inc.*, Case No. 34-2019-00264440-CU-OE-GDS
 13 (Cal. Super. Ct. Sacramento Cnty., Apr. 2, 2021) (approving \$625 hourly rate); *Curtis v. Aegis Treatment*
 14 *Centers, LLC*, Case No. 193712 (Cal. Super. Ct. Shasta Cnty., Mar. 2, 2021) (same); *Pennywell-Foster*
 15 *v. IMKO Workforce Solutions et al.*, Case No. 34-2019-00252683 (Cal. Super. Ct. Sacramento Cnty.,
 16 Nov. 23, 2020) (approving \$600 hourly rate for Mr. Barnes); *Casarez v. Chemtrade West US, LLC*, Case
 17 No. RG19008007 (Cal. Super. Ct. Alameda Cnty., Oct. 30, 2020) (same); *Parks v. Bombardier Mass*
 18 *Transit Corp. et al.*, Case No. RG18898263 (Cal. Super. Ct. Alameda Cnty., Oct. 6, 2020) (same); and
 19 *Stohs et al. v. Samsonite Co. Stores, LLC*, Case No. RG19001392 (Cal. Super. Ct. Alameda Cnty., Sept.
 20 15, 2020) (same).

REQUESTED FEES ARE REASONABLE

21 53. As of April 18, 2022, my firm has spent at least 271 hours working on this case. Using
 22 our firm’s current billing rates, these hours equate to a lodestar of \$185,073. The hours, hourly rates, and
 23 lodestar value for the staff that billed to this case are as follows:

Attorney/Timekeeper	Rate	Hours	Lodestar
Julian Hammond, Principal	\$870	32.50	\$28,275.00
Adrian Barnes, Attorney	\$725	73.40	\$53,215.00
Polina Brandler, Associate	\$695	38.40	\$26,688.00
Ari Cherniak, Associate	\$605	127.10	\$76,895.50
		271.40	\$185,073.50

1 54. The requested attorneys' fees of \$192,740 represents a multiplier of only 1.04 to Plaintiff's
2 Counsel's lodestar to date. I estimate that my firm will spend at least additional 20 to 25 hours finalizing
3 the final approval papers, appearing at the final approval hearing, and seeing the Settlement through to
4 its conclusion, which is not included in Class Counsel's lodestar. Thus, the requested fees will be equal
5 to (or more than) the requested fees by the time this case is concluded.

6 55. The requested fees award is a far less lucrative result than we usually hope and expect to
7 recover when we agreed to represent Plaintiff and the Class with no guarantee of payment, and where we
8 obtained an excellent recovery for the class in light of Defendant's vigorous contention that Plaintiff's
9 claims are barred by the First Amendment's "ministerial exception" which would act as a complete
10 defense to Plaintiff's wage and hour claims; or that, at the very least, would result in a denial of class
11 certification based on the argument that the various factors the Supreme Court looks to when deciding
12 whether the ministerial exception applies raise a host of individual issues that would need to be resolved
13 on an employee by employee basis, rendering this case unsuitable for prosecution on a class-wide basis.

14 56. HL has been awarded higher multipliers in other cases including *Chindamo v. Chapman*
15 *University*, Case No. 30-2020-01147814-CU-OE-CXC (Orange County Superior Court) (April 15,
16 2022)(awarding 1.92 multiplier); *Sweetland-Gil v. University of the Pacific*, Case No. STK-CV-UOE-
17 2019-0014682 (San Joaquin County Superior Court) (March 4, 2022)(awarding 2.52 multiplier); *Senese*
18 *v. University of San Diego*, Case No. 37-2019-00047124-CU-OE-CTL (San Diego County Superior
19 Court) (February 8, 2022) (awarding 2.98 multiplier); *Solis et al. v. Concordia University Irvine*, Case
20 No. 30-2019-01114998-CU-OE-CXC (Orange County Superior Court) (February 3, 2022)(awarding
21 1.45 multiplier); *Stupar et al. v. University of La Verne*, Case No. 19STCV333363 (Los Angeles County
22 Superior Court)(October 14, 2021) (awarding 2.48 multiplier); *Normand v. Loyola Marymount*
23 *University*, Case No. 19STCV17953 (Los Angeles County Superior Court) (September 9, 2021)
24 (awarding 3.53 multiplier); *Mooiman et al. v. Saint Mary's College of California*, Case No. C19-02092
25 (Contra Costa County Superior Court) (June 10, 2021) (awarding 2.0 multiplier); *Peng v. The President*
26 *and Board of Trustees of Santa Clara College*, Case No. 19CV348190 (Santa Clara County Superior
27 Court)(April 21, 2021) (awarding 2.75 multiplier); *Morse v Fresno Pacific University*, Case No. 19-CV-
28 04350 (Merced County Superior Court)(April 6, 2021) (awarding a 3.13 multiplier); *Harris-Foster v.*
University of Phoenix, Case No. RG19019028 (Alameda County Superior Court) (March 17, 2021)
(awarding a 3.05 multiplier); *Granberry v. Azusa Pacific University*, Case No. 19STCV28949 (Los
Angeles County Superior Court) (March 5, 2021) (awarding 1.77 multiplier); *Ott v. California Baptist*
University, Case No. RIC1904830 (Riverside County Superior Court)(January 26, 2021) (awarding 1.56

1 multiplier); *Stempien v. DeVry University, Inc.*, No. RG19002623 (Alameda County Superior
2 Court)(June 30, 2020) (awarding a 2.46 multiplier); and *Hillman v. Kaplan*, No. 34-2017-00208078
3 (Sacramento County Superior Court)(Dec. 7, 2017) (awarding 1.43 multiplier).

4 57. My firm undertook and litigated this case on a contingent fee basis, assuming a significant
5 risk that the litigation would yield no recovery and leave us uncompensated for our time and out of pocket
6 costs. The risk of nonpayment was real because cases against private universities, brought on the theory
7 that universities had misclassified its part-time adjunct instructors as exempt, failed to provide them with
8 wage statements accurately stating the total actual hours they worked, and an hourly rate, and payment
9 for all hours worked, was relatively new and untested in the courts at the time this case was filed, and
10 still are largely today. The theory that adjuncts are piece-rate workers is novel and has not been decided
11 by any appellate court.

12 58. The litigation was complex, involving multiple provisions of California labor law, novel
13 issues not yet conclusively decided by an appellate court, as well as issues regarding class certification.
14 There were also significant risks associated with the ministerial exception, which LSU contended applied
15 and therefore precluded any recovery. The uncertainties of continued litigation presented a very real risk
16 that Plaintiff would be unable to litigate his labor code claims at all and put Class Members at a risk of
17 recovering nothing. In addition to these risks, this case also faced a major risk from the COVID-19
18 pandemic and its impact on the courts and upon Defendant's financial condition.

19 59. Despite these risks, Plaintiff obtained excellent results in this case with the Gross
20 Settlement allocated to Adjuncts representing 55% of the Adjunct Class's realistic recovery (excluding
21 PAGA). The average payment per Adjunct Class Member is \$332.83 and the highest payment is
22 \$5,701.41.

23 60. Plaintiff calculated LSU's realistic exposure after discounts as \$1,416,798 for the risks
24 Plaintiff faced, including LSU's contentions that (a) Adjuncts were exempt employees; (b) the hours
25 worked before the start of the Contracts were included in the course pay and there were no unpaid wages;
26 (c) Adjuncts were never discharged; (d) LSU's actions were not willful; (e) LSU acted in good faith and
27 thus did not "knowingly and intentionally" fail to provide compliant wage statements; (f) Adjuncts were
28 authorized and permitted paid off-duty rest breaks as salaried employees; (g) Adjuncts were permitted to
and regularly did take compliant meal breaks; (h) Adjuncts were free and able to seek reimbursement for
expenses incurred for remote work; and (g) Plaintiff's claims are barred by the ministerial exception.

61. Plaintiff calculated LSU's maximum exposure on the Reimbursement Class claims
approximately \$41.47 per Reimbursement Class Member in light of the fact that LSU retroactively

1 reimbursed Reimbursement CMs \$50 per month for their expenses incurred in working remotely during
2 the Reimbursement Class Period and was at most only liable for unpaid interest. The payment per
3 Reimbursement Class Member of \$50.09 more than covers the estimated out-of-pocket expenses incurred
4 by Reimbursement Class Members.

5 62. Also, as further explained in detail in my declaration in support of preliminary approval,
6 LSU revised its compensation practices with respect to Adjunct CMs including reclassifying Adjunct
7 CMs as hourly non-exempt employees; tracking adjunct instructors' hours and including entries for total
8 hours worked and hourly rates on their wage statements; and paying Adjunct CMs for their hours worked
9 before and after each course. After the filing of this lawsuit, LSU introduced a COVID Temporary
10 Emergency Reimbursement under which it retroactively reimbursed its employees for their expenses
11 incurred in working from home during the COVID pandemic at the rate of \$25 per month for part-time
12 employees and \$50 per month for full-time employees, and has continued reimbursing its employees in
13 these amounts going forward.

14 63. To meet the needs of the case, my firm had to divert attorney time that would otherwise
15 have been spent on the firm's other wage and hour class actions.

16 64. There is no fee splitting agreement with any other firms.

17 **REQUESTED COSTS ARE REASONABLE**

18 65. Plaintiff's Counsel seeks \$19,405.94 in out of pocket litigation expenses summarized as
19 follows:

Filing / Service (OneLegal)	\$2,019.98
Filing/ Service (Bosco Legal)	\$883.70
Mediation fees (Lou Marlin)	\$8,000.00
Riverside Superior Court docket retrieval	\$228.50
Econ One Data Analyst	\$2,000.00
PAGA Filing fee	\$75.00
Survey / witness locator costs	\$5,000.00
Technology Hosting Fees	\$110.00
Research	\$1,088.76
TOTAL	\$19,405.94

66. Filing and service costs that were reasonably necessary for filing and serving Complaints, statements, stipulations, and pleadings, as follows:

Vendor	Date	Court Fee	Vendor Fee	Service Fee
One Legal	11/20/20	\$1,450.00	\$132.85	
One Legal	12/16/20			\$80.00
One Legal	12/18/20			\$130.00
One Legal	8/11/21	\$62.95	\$14.21	
One Legal	8/11/21	\$2.95	\$12.62	\$6.00
One Legal	8/11/21		\$106.55	
One Legal	1/19/22	\$20.00	\$1.85	
Bosco	12/2/20			\$107.95
Bosco	12/8/20			\$30.00
Bosco	12/21/20			\$136.95
Bosco	12/23/20			\$30.00
Bosco	1/4/21			\$127.45
Bosco	1/4/21			\$140.95
Bosco	1/4/21			\$140.95
Bosco	1/7/21			\$30.00
Bosco	1/13/21	\$20.00		\$119.45
TOTALS		\$1,555.90	\$268.08	\$1,079.70

67. Mediation costs represent half of the mediator fee of the private mediator who assisted the parties during the all-day mediation which was fundamental to reaching settlement.

68. Econ One (data analysis) costs were reasonably necessary to analyze the detailed spreadsheets produced by Defendant prior to mediation.

69. Document retrieval costs were reasonably necessary for retrieving case documents from the Court's website.

70. PAGA costs was the payment to the LWDA for Plaintiff's PAGA Notice.

71. Technology Hosting costs were reasonably necessary for maintaining databases necessary for litigating this case.

72. Online Survey / witness location costs were reasonably necessary for Plaintiff's investigation and factual development of her claims and obtaining information necessary for mediation and/ or class certification had mediation failed.

73. Research costs were reasonably necessary for all aspects of the case including drafting pleadings, drafting the mediation brief, and drafting Plaintiff's motions for approval of class settlement.

74. Plaintiff is not seeking reimbursement for \$79.12 incurred in filing documents related to the continued preliminary approval hearing.

1 75. Plaintiff's request is \$594.06 less than the \$20,000 provided for in the Settlement and
2 noticed to the Class. These funds will be added to the Net Settlement and increase the payments to the
3 participating Adjunct CMs.

4 **OBJECTION SUBMITTED BY ONE CLASS MEMBER**

5 76. Only one Class Member, Lisa Goolsby, submitted an objection form. This objection
6 provides no basis for finding the settlement unfair and should be overruled on the merits. Ms. Goolsby's
7 objection form is attached as **Exhibit E** to the Declaration of Erin La Russa Regarding Notice
8 Administration.

9 I declare under penalty of perjury under the laws of the United States and the State of California that the
10 foregoing is true and correct. Executed on April 26, 2022.

11 
12 _____
13 Julian Hammond
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EXHIBIT 1

Approved California Wage and Hour Cases

- ***Chindamo v Chapman University***, Case No. 30-2020-01147814-CU-OE-CXC (Orange County Superior Court) (April 15, 2022) (certifying HammondLaw as co-class counsel for \$1,150,000 settlement of Labor Code §§ 1194, 226(a), 226.2, 226.7, 203, and 2802 claims on behalf of approximately 1,374 adjunct instructors and 4,120 other employees);
- ***Sweetland-Gil v University of the Pacific***, Case No. STK-CV-UOE-2019-0014682 (San Joaquin County Superior Court) (March 4, 2022) (certifying HammondLaw as class counsel for \$1,800,000 settlement of Labor Code §§ 1194, 226(a), 226.2, 226.7, and 203 claims on behalf of approximately 1,100 adjunct instructors);
- ***Senese v. University of San Diego***, Case No. 37-2019-00047124-CU-OE-CTL (San Diego County Superior Court) (February 8, 2022) (certifying HammondLaw as co-class counsel for \$3,892,750 settlement of Labor Code §§ 1194, 226(a), 226.2, 226.7, and 203 claims on behalf of approximately 2,071 adjunct instructors);
- ***Solis et al. v Concordia University Irvine***, Case No. 30-2019-01114998-CU-OE-CXC (Orange County Superior Court) (February 3, 2022) (certifying HammondLaw as class counsel for \$890,000 settlement of Labor Code §§ 1194, 226(a), 226.2, 226.7, 203, and 2802 claims on behalf of approximately 778 adjunct instructors);
- ***McCoy et v Legacy Education LLC***, Case No. 19STCV2792 (Los Angeles County Superior Court) (November 15, 2021) (Labor Code § 2698 et seq. representative action settlement for \$76,000 for violation of Labor Code §§ 1194, 226(a), 226.7, 512, 203, and 2802 on behalf of 31 instructors);
- ***Merlan v Alliant International University***, Case No. 37-2019-00064053-CU- OE-CTL (San Diego County Superior Court) (November 2, 2021) (certifying HammondLaw as co-class counsel for \$711,500 settlement of Labor Code §§ 1194, 226(a), 226.2, 226.7, and 203 claims on behalf of approximately 803 adjunct instructors);
- ***Stupar et al. v University of La Verne***, Case No. 19STCV33363 (Los Angeles County Superior Court) (October 14, 2021) (certifying HammondLaw as class counsel for \$2,450,000 settlement of Labor Code §§ 1194, 226(a), 226.2, 226.7, 512, and 203 claims on behalf of approximately 1,364 adjunct instructors);
- ***Normand et al. v Loyola Marymount University***, Case No. 19STCV17953 (Los Angeles County Superior Court) (September 9, 2021) (certifying HammondLaw as class counsel for \$3,400,000 settlement of Labor Code §§ 1194, 226(a), 226.2, 226.7, and 203 claims on behalf of approximately 1,655 adjunct instructors);
- ***Veal v Point Loma Nazarene University***, Case No. 37-2019-00064165-CU-OE-CTL (San Diego County Superior Court) (August 27, 2021) (certifying

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HammondLaw as class counsel for \$711,500 settlement of Labor Code §§ 1194, 226(a), 226.2, 226.7, and 203 claims on behalf of approximately 670 adjunct instructors);

- ***Pillow et al. v. Pepperdine University***, Case No. 19STCV33162 (Los Angeles County Superior Court) (July 28, 2021) (certifying HammondLaw as class counsel for \$940,000 settlement of Labor Code §§ 1194, 226(a), 226.2, 226.7, and 203 claims on behalf of approximately 1,547 adjunct instructors);
- ***Moore et al v Notre Dame De Namur University***, Case No. 19-CIV-04765 (San Mateo County Superior Court) (July 1, 2021) (certifying HammondLaw as class counsel for \$882,880 settlement of Labor Code §§ 1194, 226(a), 226.2, 226.7, and 203 claims on behalf of approximately 397 adjunct instructors);
- ***Mooiman et al. v Saint Mary's College of California***, Case No. C19-02092 (Contra Costa County Superior Court) (June 10, 2021) (certifying HammondLaw as class counsel for \$1,700,000 settlement of Labor Code §§ 1194, 226(a), 226.2, 226.7, and 203 claims on behalf of approximately 760 adjunct instructors and Labor Code Code § 226(a) claim on behalf of 2,212 other employees);
- ***Peng v The President and Board of Trustees of Santa Clara College***, Case No. 19CV348190 (Santa Clara County Superior Court) (April 21, 2021) (certifying HammondLaw as class counsel for \$1,900,000 settlement of Labor Code §§ 1194, 226(a), 226.2, 226.7, and 203 claims on behalf of approximately 1,017 adjunct instructors and Labor Code Code § 226(a) claim on behalf of 5,102 other employees);
- ***Morse v Fresno Pacific University***, Case No. 19-CV-04350 (Merced County Superior Court) (April 6, 2021) (certifying HammondLaw as class counsel for \$1,534,725 settlement of Labor Code §§ 1194, 226(a), 226.2, 226.7, 512 and 203 claims on behalf of approximately 861 adjunct instructors);
- ***Miner, et al. v. ITT Educational Services, Inc.***, Case No. 3:16-cv-04827-VC (N.D. Cal.) (March 19, 2021) (certifying HammondLaw as class counsel for \$5.2 million settlement of Labor Code §§ 1194, 226(a), 226.2, 226.7, 512 and 2802 claims on behalf of approximately 1,154 adjunct instructors);
- ***Harris-Foster v. University of Phoenix***, Case No. RG19019028 (Alameda County Superior Court, March 17, 2021) (certifying HammondLaw as class counsel for \$2,863,106 settlement of Labor Code §§ 1194, 226(a), 226.2, 226.7 and 2802 putative class action on behalf of approximately 3,447 adjunct instructors);
- ***Granberry v. Azusa Pacific University***, Case No. 19STCV28949 (Los Angeles County Superior Court, March 5, 2021) (certifying HammondLaw as class counsel for \$1,112,100 settlement of Labor Code §§ 1194, 226(a), 226.2, 226.7 and 2802 claims on behalf of approximately 1,962 adjunct instructors);
- ***Ott v. California Baptist University***, Case No. RIC1904830 (Riverside County Superior Court, January 26, 2021) (certifying HammondLaw as co-class counsel for \$700,000 settlement of Labor Code §§ 1194, 226(a), 226.2, 226.7 and 512 claims on behalf of approximately 958 adjunct instructors);

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- ***Pereltsvaig v. Cartus Corporation***, Case No. 19CV348335 (Santa Clara County Superior Court, January 13, 2021) (certifying HammondLaw as class counsel in \$300,000 settlement of Labor Code §§ 226.8(a), 1194, 226(a), 226.7, 510, 512, and 2802 claims on behalf of 126 instructors);
- ***Morrison v. American National Red Cross***, Case No. 19-cv-02855-HSG (N.D. Cal., January 8, 2021) (certifying HammondLaw as class counsel in a \$377,000 Settlement of Labor Code §§ 1194, 226(a), 226.7, 510, 512 and 2802 claims on behalf of 377 instructors who taught training courses);
- ***Brown v. Cernx***, Case No. JCCP004971 (Cal. Sup. Ct. Alameda Cty. July 14, 2020) (certifying HammondLaw as co-class counsel in \$350,000 settlement of Labor Code §§ 1194, 226, 226.7, 510, 512, and 2802 claims on behalf of approximately 309 couriers);
- ***Stempien v. DeVry University***, Case No. RG19002623 (Cal. Sup. Ct. Alameda Cty. June 30, 2020) (certifying HammondLaw as class counsel for \$1,364,880 settlement Labor Code §§ 1194, 226, 226.2, 226.7, and 2802 claims on behalf of approximately 498 adjunct instructors);
- ***McCoy v. Concorde.***, Case No. 30-2017-00936359-CU-OE-CXC (Cal. Sup. Ct. Orange Cty. July 2, 2019) (certifying HammondLaw as class counsel for \$2,500,000 settlement of Labor Code §§ 1194, 226, 226.7, and 512 putative claims on behalf of approximately 636 adjunct instructors);
- ***Hogue v. YRC***, Case No. 5:16-cv-01338 (C.D. Cal. June 24, 2019) (certifying HammondLaw and A&T as co-class counsel for \$700,000 settlement of Labor Code §§ 1194, 226.2, 226.7, and 2802 claims on behalf of approximately 225 truck drivers);
- ***Sands v. Gold's Gym***, Case No. BC660124 (Cal. Sup. Ct. Los Angeles Cty. March 20, 2019) (Labor Code § 2698 *et seq.* representative action settlement for \$125,000 for violation of Labor Code § 1194, 2802 and 246 *et seq.* claims on behalf of 106 fitness instructors);
- ***Garcia v. CSU Fullerton.***, Case No. 30-2017-00912195-CU-OE-CXC (Cal. Sup. Ct. Orange Cty. February 15, 2019) (certifying HammondLaw as class counsel for \$330,000 settlement of Labor Code §§ 1194, 226, 226.7, and 512 claims on behalf of approximately 127 adjunct instructors);
- ***Pereltsvaig v. Stanford***, Case No. 17-CV-311521 (Cal. Sup. Ct. Santa Clara Cty. January 4, 2019) (certifying HammondLaw as class counsel for \$886,890 settlement of Labor Code §§ 1194, 226, 226.7, 512, 2802 and 2699 claims on behalf of approximately 398 adjunct instructors);
- ***Moss et al. v. USF Reddaway, Inc.***, Case No. 5:15-cv-01541 (C.D. Cal. July 25, 2018) (certifying HammondLaw and A&T as co-class counsel for \$2,950,000 settlement of Labor Code §§ 1194, 226, 226.7, and 201-203 claims on behalf of approximately 538 truck drivers);
- ***Beckman v. YMCA of Greater Long***, Case No. BC655840 (Cal. Sup. Ct. Los Angeles Cty. June 26, 2018) (Labor Code § 2698 *et seq.* representative action settlement for \$92,500 for violation of Labor Code § 1194 and 226(a) claims on behalf of approximately 101 fitness instructors);

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- ***Maldonado v. Heavy Weight Transport, Inc.***, Case No. 2:16-cv-08838 (C.D. Cal. December 11, 2017) (certifying HammondLaw and A&T as co-class counsel for \$340,000 settlement of Labor Code §§ 1194, 226, 226.2, 226.7, 226, 201-203, and 2699 claims on behalf of approximately 160 truck drivers);
- ***Hillman v. Kaplan***, Case No. 34-2017-00208078 (Cal. Sup. Ct. Sacramento Cty. December 7, 2017) (certifying HammondLaw as class counsel for \$1,500,000 settlement of Labor Code §§ 1194, 226, 226.7, 201-203 and 2802 claims on behalf of approximately 500 instructors);
- ***Bender et al. v. Mr. Copy, Inc.***, Case No. 30-2015-00824068-CU-OE-CXC (Cal. Sup. Ct. Orange Cty. October 13, 2017) (certifying HammondLaw and A&T as co-class counsel for \$695,000 settlement of Labor Code §2802 claims on behalf of approximately 250 outside sales representatives);
- ***Rios v. SoCal Office Technologies***, Case No. CIVDS1703071 (Cal. Sup. Ct. San Bernardino Cty. September 6, 2017) (certifying HammondLaw and A&T as co-class counsel for \$495,000 settlement of Labor Code §2802 claims on behalf of approximately 180 outside sales representatives);
- ***Russell v. Young's Commercial Transfer, Inc.***, Case No. PCU265656 (Cal. Sup. Ct. Tulare Cty. June 19, 2017) (certifying HammondLaw and A&T as co-class counsel for \$561,304 settlement of Labor Code §§ 1194, 226, 226.2, and 201-203 claims on behalf of approximately 962 truck drivers);
- ***Keyes v. Valley Farm Transport, Inc.***, Case No. FCS046361 (Cal. Sup. Ct. Solano Cty. May 23, 2017) (certifying HammondLaw and A&T as co-class counsel for \$497,000 settlement of Labor Code § 226, 1194, 512 and 2698 *et seq.* claims on behalf of approximately 316 truck drivers);
- ***Numi v. Interstate Distributor Co.***, Case No. RG15778541 (Cal. Sup. Ct. Alameda Cty. March 6, 2017) (certifying HammondLaw and A&T as co-class counsel for \$1,300,000 settlement of Labor Code §§ 1194, 226.2 and 2802 claims on behalf of approximately 1,000 truck drivers);
- ***Keyes v. Vitek, Inc.***, Case No. 2016-00189609 (Cal. Sup. Ct. Sacramento Cty. February 17, 2017) (\$102,000 settlement of PAGA representative action for violation of Labor Code § 226.8 on behalf of 90 truck drivers);
- ***Martinez v. Estes West dba G.I. Trucking, Inc.***, Case. BC587052 (Cal. Sup. Ct. L.A. Cty., April 4, 2017) (certifying HammondLaw and A&T as co-class counsel for \$425,000 settlement of Labor Code §§ 1194, 226, and 201-203 claims on behalf of approximately 156 truck drivers);
- ***Sansinena v. Gazelle Transport Inc.***, Case No. S1500-CV- No 283400 (Cal. Sup. Ct. Kern Cty. December 8, 2016) (certifying HammondLaw and A&T as co-class counsel for \$264,966 settlement of Labor Code §§ 1194, 226, and 201-203 claims on behalf of approximately 314 truck drivers);
- ***Cruz v. Blackbelt Enterprises, Inc.***, Case No. 39-2015-00327914-CU-OE-STK (Cal. Sup. Ct. San Joaquin Cty. September 22, 2016) (certifying HammondLaw and A&T as co-class counsel for \$250,000 settlement of Labor Code §§ 1194, 226, and 201-203 claims on behalf of approximately 79 truck drivers);

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- ***Araiza et al. v. The Scotts Company, L.L.C.***, Case No. BC570350 (Cal. Sup. Ct. L.A. Cty. September 19, 2016) (certifying HammondLaw and A&T as co-class counsel for \$925,000 settlement of Labor Code §226, 510, 512 and 2802 claims on behalf of approximately 570 merchandisers; and Labor Code 226(a) claims on behalf of approximately 120 other employees);
- ***Dixon v. Hearst Television, Inc.***, Case No. 15CV000127 (Cal. Sup. Ct. Monterey Cty. September 15, 2016) (certifying HammondLaw as class counsel for a \$432,000 settlement of Labor Code § 2802 claims on behalf of approximately 55 outside sales representatives);
- ***Garcia et al. v. Zoom Imaging Solutions, Inc.*** SCV0035770 (Cal. Sup. Ct. Placer Cty. September 8, 2016) (certifying HammondLaw and A&T as co-class counsel for \$750,000 settlement of Labor Code § 510, 512, 1194 and 2802 claims on behalf of approximately 160 sales representatives and service technicians);
- ***O'Beirne et al. v. Copier Source, Inc. dba Image Source***, Case No. 30-2015-00801066-CU-OE-CXC (Cal. Sup. Ct. Orange Cty. September 8, 2016) (certifying HammondLaw and A&T as co-class counsel for \$393,300 settlement of Labor Code §2802 claims on behalf of approximately 132 outside sales representatives);
- ***Mead v. Pan-Pacific Petroleum Company, Inc.***, Case No. BC555887 (Cal. Sup. Ct. L.A. Cty. August 30, 2016) (certifying HammondLaw and A&T as co-class counsel for \$450,000 settlement of Labor Code §§ 1194, 226, and 201-203 claims on behalf of approximately 172 truck drivers);
- ***Lange v. Ricoh Americas Corporation***, Case No. RG136812710 (Cal. Sup. Ct. Alameda Cty. August 5, 2016) (certifying HammondLaw as co-class counsel for \$1,887,060 settlement of Labor Code § 2802 claims on behalf of approximately 550 sales representatives);
- ***Alcazar v. US Foods, Inc. dba US Foodservice***, Case No. BC567664 (Cal. Sup. Ct. L.A. Cty. March 18, 2016) (certifying HammondLaw and A&T as co-class counsel for a \$475,000 settlement on behalf of approximately 634 truck drivers);
- ***Harris v. Toyota Logistics***, Case No. C 15-00217 (Cal. Sup. Ct. Contra Costa Cty. February 9, 2016) (certifying HammondLaw and A&T as co-class counsel for \$550,000 settlement reached on behalf of approximately truck 125 drivers);
- ***Albanez v. Premium Retail Services Inc.***, Case No. RG1577982 (Cal. Sup. Ct. Alameda Cty. January 29, 2016) (Private Attorney General Act Settlement for \$275,000 on behalf of approximately 38 employees);
- ***Garcia et al v. Sysco Los Angeles, et al.***, Case No. BC560274 (Cal. Sup. Ct. L.A. Cty. November 12, 2015) (certifying HammondLaw and A&T as co-class counsel for a \$325,000 settlement on behalf of approximately 500 truck drivers);
- ***Cooper et al. v. Savage Services Corporation, Inc.***, Case No. BC578990 (Cal. Sup. Ct. L.A. Cty. October 19, 2015) (certifying HammondLaw and A&T

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as co-class counsel for \$295,000 settlement on behalf of approximately 115 truck drivers);

- ***Gallardo et al. v. Canon Solutions America, Inc.***, Case No. CIVDSS1500375 (Cal. Sup. Ct. San Bernardino Cty. August 5, 2015) (certifying HammondLaw and A&T as co-class counsel for \$750,000 settlement on behalf for approximately 320 outside sales representatives);
- ***Glover v. 20/20 Companies, Inc.***, Case No. RG14748879 (Cal. Sup. Ct. Alameda Cty. August 3, 2015) (Private Attorney General Act Settlement for \$475,000 on behalf of approximately 273 independent contractors);
- ***Mayton et al v. Konica Minolta Business Solutions USA, Inc.***, Case No. RG12657116 (Cal. Sup. Ct. Alameda Cty. June 22, 2015) (certifying HammondLaw as co-class counsel for \$1,225,000 settlement on behalf for approximately 620 outside sales representatives);
- ***Garza, et al. v. Regal Wine Company, Inc. & Regal III, LLC***, Case No. RG12657199 (Cal. Sup. Ct. Alameda Cty. February 21, 2014) (certifying HammondLaw as class counsel for \$1.7 million settlement on behalf of approximately 317 employees);
- ***Moy, et al. v. Young's Market Co., Inc.***, Case No. 30-2011-00467109-CU-OE-CXC (Cal. Sup. Ct. Orange Cty. November 8, 2013) (certifying HammondLaw as co-class counsel for \$2.3 million settlement on behalf of approximately 575 sales representatives);
- ***Gagner v. Southern Wine & Spirits of America, Inc.***, Case No. 3:10-cv-10-04405 JSW (N.D. Cal. December 11, 2012) (certifying HammondLaw as co-class counsel for \$3.5 million settlement reached on behalf of approximately 870 sales representatives);
- ***Downs, et al. v. US Foods, Inc. dba US Foodservice***, Case No. 3:10-cv-02163 EMC (N.D. Cal. September 12, 2012) (certifying HammondLaw as co-class counsel for \$3 million settlement reached on behalf of approximately 950 truck drivers)

Approved California Consumer Cases

- ***Siciliano et al. v. Apple***, Case No. 1-13-cv-257676 (Cal. Sup. Ct. Santa Clara Cty. November 2, 2018) (approving \$16,500,000 settlement of Cal. Bus. Prof. Code §§ 17603, 17200, and 17535 claims on behalf of 3.9 million California subscribers to Apple InApp subscriptions);
- ***In re Ashley Madison Customer Data Security Breach Litigation***, Case No. 4:15-cv- 02669 JAR (E.D. Mis. November 20, 2017) (HammondLaw appointed to the executive committee in \$11.2 million settlement on behalf of 39 million subscribers to ashleymadison.com whose information was compromised in the Ashley Madison data breach);
- ***Gargir v. SeaWorld Inc.***, Case No. 37-2015-00008175-CU-MC-CTL (Cal. Sup. Ct. San Diego Cty. October 21, 2016) (certifying HammondLaw and Berman DeValerio as co-class counsel in \$500,000 settlement of Cal. Bus. Prof.

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Code §§ 17603, 17200, and 17535 claims class action on behalf of 88,000 subscribers to SeaWorld's annual park passes);

- ***Davis v. Birchbox, Inc.***, Case No. 3:15-cv-00498-BEN-BGS (S.D. Cal. October 14, 2016) (certifying HammondLaw and Berman DeValerio as co-class counsel in \$1,572,000 settlement of Cal. Bus. Prof. Code §§ 17603, 17200, and 17535 claims on behalf of 149,000 subscribers to Birchbox's memberships);
- ***Goldman v. LifeLock, Inc.*** Case No. 1-15-cv-276235 (Cal. Sup. Ct. Santa Clara Cty. February 5, 2016) (certifying HammondLaw and Berman DeValerio as co-class counsel in \$2,500,000 settlement of Cal. Bus. Prof. Code §§ 17603, 17200, and 17535 claims on behalf of 300,000 California subscribers to Lifelock's identity protection programs); and
- ***Kruger v. Kiwi Crate, Inc.*** Case No. 1-13-cv-254550 (Cal. Sup. Ct. Santa Clara Cty. July 2, 2015) (certifying HammondLaw as class counsel in \$108,000 settlement of Cal. Bus. Prof. Code §§ 17603, 17200, and 17535 claims on behalf of 5,400 California subscribers to Kiwi Crate's subscriptions).

EXHIBIT 2

JULIAN HAMMOND, ESQ. BILLING RECORDS

Date	Hours	Description
10/15/20	0.1	JH read Plaintiff email re: attached contracts and paystubs
10/15/20	0.1	JH read Plaintiff email re: change in classification for all adjunct professors
10/18/20	0.1	JH read PB email re: PAGA letter for review;
10/18/20	0.1	JH send PB email re: revision to PAGA;
10/19/20	0.1	JH send Plaintiff email re: filing PAGA
10/19/20	0.1	JH read Plaintiff email re: filing PAGA;
10/19/20	0.1	JH send Plaintiff email re: PAGA letter
10/23/20	0.1	JH read AC email re: course data online; attached draft complaint and academic calendar
10/26/20	0.1	JH read AC email re: research results for other cases
10/27/20	0.1	JH read AC email re: complaint
10/28/20	0.1	JH send AC email re: filing complaint and comments;
10/28/20	0.1	JH read AC email re: class period info;
10/28/20	0.1	JH read AC email re: meal/rest breaks;
10/29/20	0.1	JH send AC email re: alleging PAGA claims;
10/29/20	0.1	JH read AC email re: PAGA claims;
10/29/20	0.1	JH read AC email re: complaint w/ no meal breaks
10/29/20	0.1	JH read AC email re: file request
11/3/20	1.4	Edited complaint
11/3/20	0.1	JH read AC email re: wage statements link / Plaintiff file request
11/9/20	4.1	further Edits to complaint
11/9/20	0.1	JH send PB email re: attached complaint
11/10/20	0.2	Call with PB re: edit complaint
11/11/20	0.1	JH read PB email re: meal break and injunctive relief;
11/11/20	0.1	JH read AC email re: reviewing and filing complaint;
11/18/20	0.1	JH read AC email re: Riverside County Superior Court is now processing filings
11/23/20	0.1	JH read AC email re: attached confirmation for court filing; initial CMC date; judge assigned;
12/1/20	0.2	Research secretary of state for service
12/1/20	0.1	JH read AC email re: attached conformed complaint and notice of dept. assignment
12/1/20	0.1	JH read AC email re: service of process attempts;
12/1/20	0.1	JH send AC email re: service by mail;
12/1/20	0.1	JH read AC email re: agent for service;
12/7/20	0.1	JH send AC email re: mailing service docs;
12/7/20	0.1	JH send AC email re: notice of unsuccessful service of process from OneLegal
12/7/20	0.1	JH read AC email re: acknowledgement re filed docs;
12/7/20	0.1	JH read AC email re: attached case re CCP 415.21;
12/7/20	0.1	JH send AC email re: research la sierra lawsuits
12/9/20	0.1	JH read AC email re: attached conformed copy of complaint
12/11/20	0.1	JH read AC email re: attached complaint in word
12/11/20	0.1	JH read One Legal email re: notification of unsuccessful service of process;
12/14/20	0.1	JH read AC email re: service of process;
12/16/20	0.1	JH read One Legal email re: confirmation for process serving of Notice of CMC, Notice of Assignment
12/16/20	0.1	JH read One Legal email re: invoice for filing of notice of CMC, notice of dept. assignment
12/18/20	0.1	JH read One Legal email re: service of process order complete; attached confirmation report;
12/18/20	0.1	JH read One Legal email re: transaction re service of summons, complaint and cover sheet;
12/21/20	0.1	JH read AC email re: serving process on individuals;
12/22/20	0.1	JH read AC email re: amended complaint and PAGA notice for filing;
12/22/20	0.1	JH send PB email re: review amended complaint and PAGA notice;
1/4/21	0.1	JH read Bosco email re: attached POS of summons
1/7/21	0.1	JH send LSU Counsel email re: scheduling call to chat;
1/8/21	0.1	JH read AC email re: attached defendant's answer to plaintiff's complaint;
1/12/21	0.1	JH read AC email re: defendant's answer to plaintiff's complaint; initial CMC (1/19) off calendar;

1/14/21	0.1	JH read Court notice re: Judge Waters order re Case reassignment and CMC to be continued;
1/18/21	0.1	JH read AC email re: notice of case reassignment to Craig Riemer Dept. 1; initial CMC on 3/5;
1/26/21	0.1	JH read AC email re: notice of case reassignment to Dept. 2, Carol Greene;
2/1/21	0.1	JH send opposing counsel email re: call to discuss case;
2/1/21	0.1	JH send AC email re: notice of case reassignment;
2/1/21	0.1	JH send opposing counsel email re: mediator preference;
2/1/21	0.1	JH read opposing counsel email re: mediator's availability;
2/1/21	0.1	JH send opposing counsel email re: mediator's availability;
2/2/21	0.1	JH read, review re: La Sierra University's Answer to Plaintiff's First Amended Complaint
2/10/21	0.1	JH read opposing counsel email re: mediator and mediation dates;
2/10/21	0.1	JH send opposing counsel email re: mediator and mediation dates;
2/19/21	0.1	JH read AC email re: initial CMC date; possible mediation;
2/25/21	0.1	JH read opposing counsel email re: courtesy copy of the Joint Case Management Statement
2/26/21	0.1	JH read Dept 2 email re: notice of telephonic appearance;
3/4/21	0.1	JH read AC email re: case reassigned to David Chapman;
3/18/21	0.1	JH review notice of telephonic appearance;
3/22/21	0.1	JH read AC email re: case reassigned ; Recusal, notice of reassignment and notice of telephonic appearance;
3/30/21	0.1	JH review CMC notice;
3/30/21	0.1	JH review notice of telephonic appearance;
4/13/21	0.1	JH read opposing counsel email re: production of documents
4/22/21	0.1	JH read opposing counsel email re: mediation time
4/23/21	0.1	JH read AC email re mediation start time
4/24/21	0.1	JH read Marlin email re: changing start time
5/13/21	0.1	JH send opposing counsel email re supplemental data produced for mediation;
5/13/21	0.1	JH read AC email re LSU reimbursement policy; expense report and cellular phone, internet allowance;
5/14/21	0.1	discussion with PB re mediation brief / informal discovery status
5/19/21	0.1	JH read opposing counsel email re: online courses / data for Unreimbursed Expense Class members;
5/19/21	0.1	JH send opposing counsel email re comments to the settlement agreement
5/20/21	0.1	JH read MD email re: attached data points spreadsheet;
5/20/21	0.1	JH read opposing counsel email re: update on long form agreement;
5/21/21	0.1	JH read opposing counsel email re: additional documents production
5/21/21	0.1	JH emails x 4 with AB re: mediation brief /exhibits and mediation date
5/24/21	0.1	JH read MD email re: data points unique employees / reimbursement data
5/25/21	1.3	call with AC and AB re: 203 and 226 claim
5/25/21	0.1	JH send AC email re: handbook;
5/25/21	0.1	JH read AC email re: contracts and pay stubs;
5/25/21	0.1	JH send AC, Adrian email re: link to La Sierra bulletins;
5/28/21	0.1	JH read opposing counsel email re: documents supporting the ministerial exception defense
6/2/21	0.1	JH send opposing counsel email re: numbers for the class, paga class, and wage statements
6/2/21	0.1	JH send PB email re: attached data points;
6/2/21	0.1	JH emails x 4 with MD email re: number of pay periods
6/2/21	0.1	JH read opposing counsel email re: additional documents produced subject to the mediation privilege
6/2/21	0.3	JH emails x5 with AB email re: finalize brief; damages analyses
6/3/21	0.1	JH read opposing counsel email re: additional documents subject to the mediation privilege
6/3/21	0.1	JH read PB email re: list of documents produced;
6/3/21	0.1	JH read opposing counsel email re: requested data points; copy of PAGA letter
6/4/21	0.1	JH email x2 with PB re: expense reimbursement policies applicable to Class Members
6/6/21	0.1	JH emails x2 with PB re: revised mediation brief; decision re ministerial exemption
6/7/21	1.1	review mediation brief;
6/7/21	0.1	JH read AC email re: attached draft settlement agreement for review;
6/8/21	0.1	JH read opposing counsel email re: Defendant's Mediation Brief
6/9/21	0.1	JH read PB email re: question re Adrian's title and role;

6/9/21	0.1	JH read opposing counsel email re: draft settlement agreement
6/14/21	8.5	attend mediation; prep before mediation
6/14/21	0.1	JH read PB email re: ministerial exception argument
6/14/21	0.1	JH review completed MOU;
6/14/21	0.1	JH read opposing counsel email re: revised MOU;
6/14/21	0.1	JH read Marlin email re: final version of MOU
6/15/21	0.1	JH read AC email re: draft settlement, notice, and amended complaint
6/15/21	0.1	JH emails x2 with AC email re: Dept S302 availability for motion
6/15/21	0.1	JH read AC email re: changes to settlement
7/2/21	0.1	JH read AC email re: Defendant's edits to the Settlement
7/8/21	0.1	JH read AC email re: defendant redlined SA; discussion re edits
7/8/21	0.1	JH read Adrian email re: LSU survey of class members
7/10/21	0.1	JH read AB email re: draft preliminary approval papers
7/15/21	0.1	JH read AC email re: motion + decl with changes;
7/15/21	0.1	JH read AC email re: Settlements approved by Judge Bermudez
7/31/21	0.1	JH emails x3 with AC, PB email re: status of settlement agreement
8/3/21	0.1	JH read AC email re: update on notice
8/16/21	0.1	JH review La Sierra's answer to SAC;
8/23/21	0.1	AC emails x 3 with JH, pB re: dial in info for 9-2 prelim approval hearing; review notice of telephonic hearing
10/13/21	0.1	JH read AC email re: motion granted re prelim approval, hearing off calendar;
10/14/21	0.1	JH read CPT email re: Notice Administration - Introduction;
10/25/21	0.1	JH read CPT email re: Confirmation of Class List;
10/25/21	0.1	JH read CPT email re: Request for Approval of Administration Timeline & Mailing Documents;
10/28/21	0.1	JH read AC email re: class size and escalator;
11/15/21	0.1	JH read CPT email re: attached prelim calculations for approval;
11/15/21	0.1	JH read CPT email re: class size;
11/17/21	0.1	JH read opposing counsel email re: approval of prelim calculations;
11/18/21	0.1	JH read CPT email re: confirmation of mailing;
11/26/21	0.1	JH read CPT email re: attached weekly report;
11/26/21	0.1	JH read AC email re: attached draft decl. for review and CMO requirements;
12/3/21	0.1	JH read CPT email re: attached weekly report;
12/9/21	0.1	JH read CPT email re: attached notice responses received;
12/10/21	0.1	JH read AC email re: objections received;
12/13/21	0.1	JH read CPT email re: objection form sent;
12/13/21	0.1	JH read AC email re: objection form
12/14/21	0.1	JH read CPT email re: dispute re number of credits;
12/17/21	0.1	JH read CPT email re: attached weekly report;
12/21/21	0.1	JH read CPT email re: attached additional opt-outs;
12/27/21	0.1	JH read CPT email re: attached weekly report;
1/6/22	0.1	JH read AC email re: CM order statement; getting decl. from Pearl;
1/6/22	0.1	JH read CPT email re: attached additional opt out;
1/7/22	0.1	JH read CPT email re: attached weekly report;
1/7/22	0.1	JH read opposing counsel email re: update on resolving notice dispute;
1/14/22	0.1	JH read CPT email re: attached weekly report;
1/21/22	0.1	JH read CPT email re: update re disputes;
1/28/22	0.1	JH read CPT email re: attached weekly report;
2/1/22	0.1	JH read CPT email re: Request for Approval of Revised Preliminary Calculations;
2/2/22	0.1	zoom with AC re: class notice
2/3/22	0.1	JH read CPT email re: attached weekly report;
2/3/22	0.1	JH read CPT email re: attached additional opt out;
2/10/22	0.1	JH read CPT email re: confirmation of mailing;
2/18/22	0.1	JH read CPT email re: attached weekly report;

3/4/22	0.1	JH read CPT email re: additional opt outs;
3/11/22	0.1	JH read CPT email re: attached weekly report;
3/11/22	0.1	JH read CPT email re: attached weekly report;
3/18/22	0.1	JH read CPT email re: attached weekly report;
3/21/22	0.1	JH read CPT email re: additional reimbursement opt-outs;
3/25/22	0.1	JH read CPT email re: attached weekly report;
4/1/22	0.1	JH read CPT email re: attached weekly report;

ARI CHERNIAK, ESQ. BILLING RECORDS

Date	Hours	Description
10/15/20	0.1	AC read JH email re: discuss contracts and paystubs
10/16/20	0.1	AC read PB email re: download the "position description doc" ; attached link
10/16/20	0.1	AC send PB email re: position posting
10/20/20	0.1	AC read PB email re: submit and mail the attached PAGA notice
10/20/20	0.4	AC file/ serve PAGA Notice
10/23/20	0.1	AC send JH, PB email re: course data online ; attached draft complaint and academic calendar
10/23/20	2.4	AC draft complaint
10/26/20	0.1	AC send JH email re: research results for other cases
10/27/20	0.1	AC send JH email re: complaint
10/28/20	0.1	AC read PB email re: complaint with edits;
10/28/20	0.1	AC read JH email re: filing complaint and comments;
10/28/20	0.1	AC send JH email re: class period info;
10/28/20	0.1	AC send PL email re: complaint and summons for filing;
10/28/20	0.7	AC review covers sheets with PL; review Riverside local rules and complete guidelines
10/28/20	0.1	AC send Plaintiff email re: complaint for review;
10/28/20	0.1	AC read Plaintiff email re: approval of complaint;
10/28/20	0.1	AC send JH email re: meal/rest breaks;
10/29/20	0.1	AC read JH email re: alleging PAGA claims;
10/29/20	0.1	AC send JH, PB email re: PAGA claims;
10/29/20	0.1	AC read PB email re: client work info;
10/29/20	0.1	AC send JH, PB email re: complaint w/ no meal breaks
10/29/20	0.1	AC send JH, PB email re: file request
10/29/20	0.2	AC revise Complaint; discuss meal break claim with JH
10/29/20	0.2	AC draft file request; send out
11/3/20	1.5	AC edit complaint;
11/10/20	0.1	AC send email PL re: update the cover sheet, summons, and affidavit; file on OneLegal
11/10/20	0.1	AC send PL email re: cover sheet and summons
11/10/20	1.1	AC review / redline complaint; zoom call re: filing
11/11/20	0.1	AC send JH email re: reviewing and filing complaint;
11/11/20	0.1	AC send PL email re: file attached complaint;
11/11/20	0.1	AC read PL email re: file attached complaint
11/18/20	0.1	AC send JH email re: Riverside County Superior Court is now processing filings
11/23/20	0.1	AC send JH email re: attached confirmation for court filing; initial CMC date; judge assigned;
12/1/20	0.1	AC send Server email re: service of process;
12/1/20	0.1	AC send JH email re: conformed complaint and notice of dept. assignment
12/1/20	0.1	AC send JH email re: service of process attempts;
12/1/20	0.1	AC read JH email re: service by mail;
12/1/20	0.1	AC send JH email re: agent for service;
12/1/20	0.1	AC read Bosco email re: attached rate sheet; service of process payment;
12/1/20	0.1	AC send Bosco email re: service of process payment;
12/1/20	0.7	AC research service/ call onelegal re: service; print and mail
12/2/20	0.2	AC emails x 3 with Bosco email re: service of process update;
12/7/20	0.1	AC emails x 2 with Bosco re: service of process update;
12/7/20	0.1	AC read JH email re: mailing service docs;
12/7/20	0.1	AC read JH email re: notice of unsuccessful service of process from OneLegal
12/7/20	0.1	AC send JH email re: acknowledgement re filed docs;
12/7/20	0.1	AC emails x 2 with Bosco re: Proof of Substitute service
12/7/20	0.1	AC send JH email re: attached case re CCP 415.21;
12/7/20	0.1	AC read JH email re: research la sierra lawsuits

12/7/20	0.5	AC research service of process on security guard ; CCP 415.21; emails JH re same
12/8/20	0.1	AC read Bosco email re: attached proof of service of summons for court filing;
12/8/20	0.1	AC send Bosco email re: attached proof of service of summons for court filing;
12/9/20	0.1	AC send JH email re: attached conformed copy of complaint
12/11/20	0.1	AC send JH email re: attached complaint in word
12/11/20	0.1	AC read One Legal email re: notification of unsuccessful service of process;
12/14/20	0.1	AC send JH email re: service of process;
12/14/20	0.1	AC emails x 2 with Simpluris re: address search for service of process
12/15/20	0.1	AC emails x 2 Simpluris email re: address search for service of process
12/16/20	0.1	AC emails x 2 with Simpluris email re: address search for service of process
12/18/20	0.4	AC amend complaint
12/21/20	0.1	AC emails x 2 with Simpluris re: update re address search;
12/21/20	0.1	AC send JH email re: serving process on individuals;
12/21/20	0.4	AC research address for process service; send to process server; email JH re: same; email Bosco re: service order
12/22/20	0.1	AC emails x 6 with Bosco re: update on service of complaint; POS for filing
12/22/20	0.1	AC send PB, JH email re: amended complaint and PAGA notice for filing;
12/22/20	0.1	AC read Bosco email re: service of process on CEO
12/23/20	0.3	file/serve notice of change of address
12/23/20	2.1	AC draft CMC statement + attachments
1/4/21	0.1	AC send Plaintiff email re: attached Alternative Dispute Resolution (ADR) Information Packet for review
1/4/21	0.3	AC x9 emails with Bosco re: deadline for same day filing; complaint processing
1/4/21	0.1	AC send PB email re: attached amended complaint for review;
1/4/21	0.1	AC read PB email re: uploading filed PAGA;
1/4/21	0.1	AC read PB email re: attached redlined FAC;
1/4/21	0.1	AC read Bosco email re: service confirmation re Plaintiff's FAC; Case Management Statement
1/4/21	0.6	AC review FAC and file / serve
1/4/21	1.1	AC review CMC statement and file
1/8/21	0.1	AC send PB, JH email re: attached defendant's answer to plaintiff's complaint;
1/11/21	0.1	AC send Bosco email re: court processing times;
1/11/21	0.1	call clerk re: declination and CMC scheduling
1/12/21	0.1	AC send JH, PB email re: defendant's answer to plaintiff's complaint; initial CMC (1/19) off calendar;
1/12/21	0.2	call with clerk re: CMC and judge assignment
1/13/21	0.3	AC e-mails x 4 with opposing counsel re: redlined Amended Complaint; stipulation
1/13/21	0.1	AC send Bosco email re: attached stip to file FAC for court filing;
1/14/21	0.1	AC read Bosco email re: paid invoice re rush service;
1/18/21	0.1	AC send JH email re: notice of case reassignment to Craig Riemer Dept. 1; initial CMC on 3/5;
1/18/21	0.1	AC send opposing counsel re: courtesy copy of Plaintiff's Motion for Peremptory Disqualification;
1/18/21	0.1	AC read e-Submit email re: delivery confirmation
1/18/21	0.6	draft and file declination to Judge Reimer
1/22/21	0.1	AC read Riverside courts email re: attached document received re motion for peremptory
1/22/21	0.3	call clerk re: status of filings
1/26/21	0.1	AC send JH email re: notice of case reassignment to Dept. 2, Carol Greene;
2/1/21	0.1	AC send opposing counsel email re: courtesy copies of the signed Order, FAC and case assignment;
2/1/21	0.1	AC read JH email re: notice of case reassignment;
2/1/21	0.1	AC read eSubmit email re: confirmation re document received

2/1/21	0.1	AC read Bosco email re: conformed copy of filing re joint stip to file FAC;
2/1/21	0.1	AC send SR email re: amended complaint
2/1/21	0.7	review docket; serve FAC; draft and file POS for FAC and dept. assignment
2/1/21	0.2	review CMC order issued by Dept. 1
2/2/21	0.1	AC read, review re: La Sierra University's Answer to Plaintiff's First Amended Complaint
2/10/21	0.6	draft CMC statement
2/12/21	0.1	AC send marlin email re: mediation availability;
2/12/21	0.1	AC read marlin email re: mediation availability;
2/16/21	0.1	AC read opposing counsel email re: plaintiff's mediation availability;
2/17/21	0.2	AC emails x6 with opposing counsel and Marlin re: mediation availability;
2/19/21	0.1	AC send JH email re: initial CMC date; possible mediation;
2/19/21	1.4	draft CMC statement; send to PB and JH along with case assignment;
2/22/21	0.4	draft informal discovery; send to JH / PB for review
2/24/21	0.1	call clerk re: March 5 CMC
2/24/21	0.2	AC emails x 3 with opposing counsel re: attached draft CMC statement for review;
2/25/21	0.8	AC emails x 12 with opposing counsel re: joint CMC statement; review and revise statement
2/25/21	0.1	AC read opposing counsel email re: courtesy copy of the Joint Case Management Statement
2/26/21	0.1	AC send opposing counsel email re: informal discovery list
2/26/21	0.1	AC read Dept 2 email re notice of telephonic appearance;
3/2/21	0.1	AC review notice of case reassignment; joint CMC statement;
3/2/21	0.1	AC send PB email re: CMC statement and dial in info;
3/4/21	0.1	AC send PB, JH email re: case reassigned to David Chapman;
3/18/21	0.1	AC review notice of telephonic appearance;
3/19/21	0.1	AC read opposing counsel email re: preparing joint CMC statement
3/22/21	0.1	AC send JH email re: case reassigned ; Recusal, notice of reassignment and notice of telephonic appearance;
3/22/21	0.4	update CMC statement; review and file reassignment; file statement
3/23/21	0.1	AC send opposing counsel email re: CMC continued until April 8; attached notice;
4/5/21	0.2	review docket; download CMC continuance
4/9/21	0.1	AC send opposing counsel email re: production documents and data
4/13/21	0.1	AC read opposing counsel email re: production of documents
4/22/21	0.1	AC send opposing counsel email re mediation start time
4/22/21	0.1	AC read opposing counsel email re mediation time
4/23/21	0.1	AC send JH email re: mediation start time
4/26/21	0.1	AC read Marlin email re: changing start time
4/26/21	0.1	AC send opposing counsel email re: production of documents and data
4/26/21	0.1	AC emails x 6 with opposing counsel, Marlin re: mediation start time
5/3/21	0.1	AC send opposing counsel email re: update on production
5/3/21	0.1	AC read opposing counsel email re: update on production
5/10/21	0.1	AC send MD email re: adjunct data spreadsheet for analysis
5/10/21	0.4	review/ file data spreadsheet
5/11/21	0.1	AC read MD email re: relevant date ranges, relevant restrictions
5/11/21	0.6	review document production
5/12/21	0.1	AC read MD email re: data for workweeks, pay periods, class sessions, and pay;
5/12/21	0.1	AC emails x 6 with JH, Marlin re: mediation brief
5/12/21	0.1	AC send AB email re: documents for the La Sierra mediation brief
5/12/21	2.2	review production, emails, draft email to opposing counsel re: data issues; review response;
5/12/21	0.3	call with AB re: mediation brief; draft email re brief;
5/13/21	0.1	AC send opposing counsel email re: supplemental data produced for mediation;
5/13/21	0.1	AC emails x 3 with MD re: calculating work weeks and pay periods

5/13/21	0.1	AC send opposing counsel email re: Unreimbursed Expense Class size/ wage statements
5/13/21	0.1	AC read MD email re: online course data
5/13/21	0.1	AC send opposing counsel email re: online courses/ reimbursement data
5/13/21	0.1	AC send JH email re: LSU reimbursement policy; expense report and cellular phone, internet allowance;
5/19/21	0.1	AC read MD email re data points you asked for
5/19/21	0.1	AC read opposing counsel email re: online courses / data for Unreimbursed Expense Class members;
5/19/21	0.1	AC send MD email re: updated spreadsheets and notes from La Sierra.
5/19/21	0.1	AC send opposing counsel email re: draft long-form settlement
5/19/21	0.1	AC emails x 5 with AB email re: draft mediation brief and exhibitbits
5/19/21	0.2	review/ file discovery
5/20/21	0.2	AC emails x 3 with Marlin email re: mediation fee
5/20/21	0.1	AC read MD email re: attached data points spreadsheet;
5/20/21	0.1	AC read opposing counsel email re: update on long form agreement;
5/20/21	0.1	AC send MD email re: payroll dates and data points for analysis;
5/20/21	0.1	AC send opposing counsel email re: sample contracts and wage statements data
5/20/21	1.5	call with JH; call with Adrian; review data production; review analysis
5/20/21	2	create survey; send to CMs
5/21/21	0.1	AC send opposing counsel email re: LSU Ministerial Exception defense
5/21/21	0.1	AC send AB email re: Ministerial exception briefing
5/21/21	0.1	AC read opposing counsel email re: additional documents production
5/21/21	0.6	call with JH; call with Adrian; review data production; review analysis
5/21/21	1.7	draft Settlement Agreement/ Notice
5/21/21	0.4	send surveys
5/24/21	0.1	AC read MD email re: data points for unique employees / reimbursement data
5/24/21	0.1	AC send AB email re: LSU supporting documents for the ministerial exception.
5/24/21	0.1	AC read Adrian email re: discussion re supporting documents for the ministerial exception.
5/25/21	0.1	AC read JH email re: handbook;
5/25/21	0.1	AC send JH, Adrian email re: contracts and pay stubs;
5/25/21	0.1	AC send opposing counsel email re: contracts from each academic term
5/25/21	0.2	AC emails x 4 with GB re: survey results
5/25/21	0.1	AC read JH email re: link to La Sierra bulletins;
5/25/21	1.3	Zoom call with Adrian and JH re: mediation brief
5/27/21	0.1	AC read AB email re: updated version of the brief
5/27/21	0.7	review/ edit draft mediation brief
5/28/21	0.1	AC read opposing counsel email re documents supporting the ministerial exception defense
6/2/21	0.1	AC read AB email re: updated mediation brief
6/7/21	0.1	AC send JH, PB email re: attached draft settlement agreement
6/8/21	0.1	AC send Plaintiff email re Zoom link
6/8/21	0.1	AC read opposing counsel email re: Defendant's Mediation Brief
6/8/21	0.2	call plaintiff re: mediation; circulate briefs
6/14/21	0.1	AC read opposing counsel email re: revised MOU;
6/14/21	0.1	AC read Marlin email re: final version of MOU
6/14/21	0.2	call with JH re: mediation and settlement
6/15/21	0.1	AC send CPT email re: bid to administer a class settlement
6/15/21	0.1	AC read CPT email re: Attached bid; review bid
6/15/21	0.1	AC send PB, JH, AB email re: draft settlement, notice, and amended complaint
6/15/21	0.1	AC emails x2 with JH email re: Dept S302 availability for motion

6/15/21	0.1	AC send JH email re: changes to settlement
6/15/21	0.1	AC emails x 2 with AB email re: approval papers; filing deadline
6/15/21	3.8	draft settlement Agreement; amended complaint; amend PAGA notice
6/17/21	0.1	AC send opposing counsel email re: draft Settlement Agreement, Class Notice, Second Amended Complaint.
6/17/21	0.4	review PB edits; redline SAC
6/28/21	0.1	AC send opposing counsel email re Defendant's comments re settlement agreement and class notice;
7/1/21	0.1	AC send opposing counsel email re: follow up on the settlement agreement.
7/1/21	0.2	AC read opposing counsel email re: revised agreement is attached; review edits
7/1/21	0.1	AC send opposing counsel email re: stip on SAC;
7/2/21	0.1	AC send JH, PB, Adrian email re: Defendant's edits to the Settlement
7/2/21	0.1	AC read opposing counsel email re: attached stip on SAC;
7/2/21	0.1	AC send opposing counsel email re: signed order; email service of the Second Amended Complaint
7/2/21	0.1	AC read opposing counsel email re: email service of the Second Amended Complaint;
7/2/21	0.1	AC read Riverside court email re: attached filed joint stip to SAC;
7/2/21	0.3	finalize/ file stip on SAC; review PV edits to Settlement;
7/7/21	0.1	AC send opposing counsel email re: service of the SAC
7/8/21	0.1	AC send JH, PB email re: redlined SA; discussion re edits
7/8/21	0.1	AC read AB email re: LSU survey of class members
7/8/21	0.1	AC send GB email re: survey results from LSU
7/8/21	0.1	AC send AB email re: survey response
7/9/21	0.1	AC read AB email re: proposed order, notice of motion/motion
7/9/21	0.1	AC send AB email re: re proposed order, notice of motion/motion.
7/12/21	0.1	AC read AB email re: draft preliminary approval papers
7/13/21	0.1	AC send PB email re: redlines to SA
7/13/21	0.1	AC send AB email re: data points for Kullar analysis
7/13/21	2.8	review AB draft; revise Kullar
7/14/21	0.2	AC 4x emails with PB email re: data points for Kullar; re-classification of adjuncts
7/14/21	4.8	review/ redline declaration; review / redline MPA ISO prelim approval
7/15/21	0.2	AC emails x 3 with PB re: data points for Kullar
7/15/21	0.1	AC send JH, PB, AB email re: motion + decl with changes;
7/15/21	4.5	review/ redline Decl; review / redline MPA
7/15/21	1	research Judge Bermudez orders in other cases; email JH, PB with results
7/19/21	0.1	AC send opposing counsel email re: further edits re SA and complaint;
7/20/21	0.1	AC read opposing counsel email re: recent redlines re SA
7/20/21	0.1	AC send opposing counsel email re: recent version re SA;
7/21/21	0.4	review SA; review notice; emails x 2 to opposing counsel re; same
7/22/21	0.1	AC read opposing counsel email re: Agreement in final.
7/23/21	0.9	final review, PDF and circulate Settlement Agreement; email opposing counsel re: same
7/27/21	0.1	AC send opposing counsel email re: further changes to the Notice
7/27/21	0.1	AC read opposing counsel email re: attached revised notice;
7/27/21	0.4	revise / redline notice;
7/28/21	0.1	AC send opposing counsel email re: further changes in redline
7/28/21	0.1	AC read opposing counsel email re: comments in the class notice.
7/28/21	0.7	review edits; redline notice;
7/29/21	0.1	AC send opposing counsel email re: Settlement should be ready for signature; prelim approval hearing date and deadlines

7/29/21	0.3	review Notice; draft email to PV re: case timeline
8/2/21	0.1	AC send opposing counsel email re: preliminary approval timeline
8/2/21	0.1	AC read opposing counsel email re: preliminary approval timeline;
8/3/21	0.1	AC send PL email re: tables of authorities / contents
8/3/21	0.1	AC send opposing counsel email re: further edits to the Notice
8/3/21	0.1	AC send JH email re: update on notice
8/4/21	0.1	AC read PL email re: motion with tables;
8/4/21	0.1	AC emals x 3 with opposing counsel email re: executed settlement agreement
8/5/21	3.8	review / revise motion + decl.; send to opposing counsel
8/6/21	0.1	AC send PB email re: LSU reimbursement policy;
8/6/21	1.1	further revisions to prelim papers;
8/9/21	0.1	AC send opposing counsel email re signed Agreement; comments to the preliminary approval motion
8/10/21	0.2	AC emails x 3 with opposing counsel re: fully executed settlement agreement; redlines to the MPA; e-service agreement
8/10/21	0.8	review/ edit MPA with Defendant edits
8/11/21	1.7	finalize / file /serve prelim motion
8/16/21	0.1	AC review La Sierra's answer to SAC;
8/16/21	0.2	check docket for page limit app; review order
9/1/21	0.5	review tentative; leave opposing counsel VM and email
9/2/21	0.1	AC send Cy Pres email re: recipient Declaration
9/2/21	0.1	AC send CPT email re: Court requested declaration from CPT
9/2/21	5.2	draft supp decl; draft revised notice, forms, proposed order; draft and send email to Defendant re: addressing tentative
9/3/21	0.1	AC send opposing email re: bids from other admins per CMO ¶ H.3(d)(i)-(-);
9/3/21	0.5	AC emails x 4 with admins re bids; review bids
9/9/21	0.4	AC emails x 3 with opposing counsel re: time to discuss the tentative; call with opposing counsel
9/9/21	1.8	Review Banks decl. and re-draft; send bck to declarant
9/10/21	0.3	further revise banks decl.;
9/17/21	0.4	further revisions to draft Supp decl.
9/20/21	0.1	AC send MD email re: data points for tentative ruling
9/20/21	0.1	AC emails x 3 with opposing counsel re: edits to the Amended Term Sheet / Amended Class Notice; cy pres declaration + CPT decl
9/20/21	0.5	revise/ edit supp decl. re: data points for CM payments
9/23/21	0.1	AC review Defendant declaration + declaration of Human Resources Director
9/23/21	2.1	further review/ edit supp decl; review declarations; revise Notice and finalize ; emails with opposing counsel re: final versions
10/4/21	0.2	review / file stip for CMC;
10/13/21	0.1	AC send JH, PB email re: motion granted re prelim approval, hearing off calendar;
10/13/21	0.1	AC send opposing counsel email re: Court's tentative ruling on preliminary approval
10/13/21	0.4	review tentative; draft email to CPT re; administration
10/14/21	0.2	AC emails x3 with CPT email re: Notice Administration - Introduction; case website
10/15/21	0.2	AC emails x 2 with opposing counsel email re: final approval hearing date
10/15/21	0.4	call with Dept clerk re: final approval date; fees date; file and send order to CPT
10/21/21	0.1	AC send PL email re: time and costs;
10/25/21	0.1	AC read CPT email re: Confirmation of Class List;
10/25/21	0.1	AC read CPT email re: Request for Approval of Administration Timeline & Mailing Documents;
10/26/21	0.2	AC emails x 4 with CPT email re: approval of notice and forms; case website
10/28/21	0.1	AC send JH email re: class size and escalator;

11/3/21	0.1	AC emails x 4 with CPT re: finalized class sizes; notice mailing date
11/9/21	0.2	call clerk re: hearing dates;
11/12/21	0.1	AC send CPT email re: class size;
11/15/21	0.1	AC read CPT email re: attached prelim calculations for approval;
11/15/21	0.1	AC read CPT email re: class size;
11/16/21	0.5	review class data;review Notices; email CPT re: approval of prelim calc and notice
11/17/21	0.1	AC read opposing counsel email re: approval of prelim calculations
11/18/21	0.1	AC read CPT email re: confirmation of mailing;
11/23/21	0.1	AC send CPT email re: posting docs to settlement website;
11/26/21	0.1	AC read CPT email re: attached weekly report;
11/26/21	0.1	AC send CPT email re: plaintiff's settlement share;
11/26/21	0.1	AC send Plaintiff email re: declaration;
11/26/21	0.1	AC emails x 4 with PL email re: costs and receipts;
11/26/21	0.1	AC send JH, PB email re: draft decl. for review; review CMO requirements;
11/26/21	5.5	draft Plaintiff decl. / draft damages analysis; review CMO; call with Plaintiff re: decl
11/26/21	0.2	review costs;
12/3/21	0.1	AC read CPT email re: attached weekly report;
12/3/21	0.1	AC send CPT email re: breakdown of opt outs
12/6/21	0.1	AC read CPT email re: attached weekly reports including opt-outs;
12/9/21	0.1	AC read CPT email re: attached notice responses received;
12/10/21	0.4	AC send JH, PB email re: attached objections received; review objection opt outs; review settlement
12/13/21	0.1	AC read CPT email re: objection form sent;
12/13/21	0.1	AC send JH, PB email re: objection form sent; review objection and circulate
12/13/21	0.1	AC send PL email re: costs breakdown per CMO; calssing costs
12/14/21	0.1	AC read CPT email re: dispute re number of credits;
12/14/21	0.4	review costs compile PL;
12/16/21	0.1	check Settlement website for docs;
12/17/21	0.1	AC read CPT email re: attached weekly report;
12/27/21	0.1	AC read CPT email re: attached additional opt-outs;
12/27/21	0.1	AC read CPT email re: attached weekly report;
1/3/22	0.1	AC send CPT email re: circulating draft decl.;
1/3/22	0.1	AC review CMO and email opposing counsel re: uncashed checks
1/3/22	0.1	AC send CPT email re: circulating draft decl.;
1/3/22	0.1	AC send Opposing Counsel email re: CM order;
1/3/22	4.4	review CMO Order; draft declaration ISO final approval; review plaintiff time records;
1/4/22	0.1	AC read CPT email re: circulating decl.;
1/6/22	0.1	AC emails x 2 with JH email re: plaintiff's service award;
1/6/22	0.1	AC read CPT email re: attached additional opt out;
1/7/22	0.1	AC read CPT email re: attached weekly report;
1/7/22	0.1	AC send CPT email re: update on resolving dispute;
1/7/22	0.1	AC read opposing counsel email re: update on resolving notice dispute;
1/7/22	4.7	draft MPA ISO final approval; MPA ISO fees; review costs breakdown;
1/10/22	0.1	AC read opposing counsel email re: attached stip to continue final approval hearing;
1/10/22	0.4	call with opposing counsel re: escalator clause; draft email to opposing counsel re: same
1/11/22	0.4	review/ edit stip re; final approval; send to opposing counsel
1/13/22	0.1	AC send CPT email re: request for updated bid and timeline;
1/14/22	0.1	AC read CPT email re: attached weekly report;
1/14/22	0.8	call with CPT re: add'l notices; revise stip on final approval;
1/17/22	0.1	AC send CPT email re: notice mailing confirmation;
1/18/22	0.1	AC emails x 5 with CPT re: update on circulating revised bid; sending add'l notices
1/18/22	0.1	AC send opppsing counsel email re: attached revised joint stip to continue final approval;

1/18/22	0.4	call with CPT re: notice mailing; revise stip;
1/20/22	0.2	call Riverside clerk re: final approval date;
1/20/22	0.1	AC send CPT email re: final approval hearing continued; updating case website;
1/21/22	0.1	AC read CPT email re: update re disputes;
1/27/22	0.1	AC send CPT email re: update on additional notice;
1/27/22	0.1	AC read CPT email re: status update on additional notice;
1/28/22	0.1	AC read CPT email re: attached weekly report;
2/1/22	0.1	AC send CPT email re: update on additional notices and data clarifications;
2/1/22	0.1	AC read CPT email re: Request for Approval of Revised Preliminary Calculations;
2/2/22	0.1	AC emails x 5 with CPT email re: revised prelim calculations;
2/3/22	0.1	AC read CPT email re: attached weekly report;
2/3/22	0.1	AC read CPT email re: attached additional opt out;
2/3/22	0.6	review Class Notice; review NSA breakdown; emails x 5 with CPT email re: Updated Timeline, Revised Notice Packet and Revised Bid;
2/4/22	0.1	AC emails x 10 with CPT, opposing counsel re: additional reimbursement class opt outs; NSA calculations;
2/4/22	0.7	redline notice; calls x2 with Parnian re: corrected notice
2/7/22	0.7	further revise add'l notice; review calcs; call with CPT; emails x 4 with CPT re: mailing timeline and opt outs
2/8/22	0.7	further revise add'l notice; review calcs; call with CPT; emails x 5 with CPT re: updated mailing documents for review;
2/10/22	0.1	AC read CPT email re: confirmation of mailing;
2/11/22	0.1	AC read CPT email re: attached weekly report;
2/11/22	0.1	AC send CPT email re: including additional notices in weekly report;
2/11/22	0.1	AC read CPT email re: including additional notices in weekly report;
2/18/22	0.1	AC read CPT email re: attached weekly report;
2/21/22	0.1	AC send CPT email re: response deadline for remailed notices;
2/22/22	0.1	AC read CPT email re: response deadline added to website;
3/7/22	0.1	AC read CPT email re: additional opt outs;
3/7/22	0.5	AC emails x 4 with CPT re: additional info on objections; review objections
3/11/22	0.1	AC read CPT email re: attached weekly report;
3/11/22	0.1	AC read CPT email re: attached weekly report;
3/17/22	0.1	AC send CPT email re: request for draft declaration;
3/18/22	0.1	AC read CPT email re: attached weekly report;
3/21/22	0.1	AC read CPT email re: additional reimbursement opt-outs;
3/22/22	1.8	review/ redline CPT Decl.; review and update time records for fees motion;
3/23/22	0.3	call with CPT re: declaration edits;
3/23/22	0.6	continue to review time records + final approval checklist;
3/25/22	0.1	AC read CPT email re: attached weekly report;
3/28/22	0.5	review / redline CPT Decl.;
3/29/22	0.2	call with CPT re decl. edits;
3/30/22	0.1	AC send PB email re: attached plaintiff decl. for review;
3/30/22	0.1	AC emails x 2 with CPT re: clarification re settlement bid;
4/1/22	0.1	AC read CPT email re: attached weekly report;
4/8/22	0.1	AC send Andrew email re: attached draft motion papers for final approval;
4/18/22	1.1	review opposing counsel edits; further edits and comments to motion and order

POLINA BRANDLER, ESQ. BILLING RECORDS

Date	Hours	Description
10/15/20	0.1	PB read JH email re: discuss contracts and paystubs
10/16/20	0.9	research re docs (contracts, wage statements); looking for and reviewing faculty handbook; SI on cal sec; other online docs
10/16/20	0.7	drafting PAGA notice
10/16/20	0.1	PB send AC email re: download the "position description doc" ; attached link
10/18/20	0.1	PB send JH email re: PAGA letter for review;
10/18/20	0.1	PB read JH email re: revision PAGA;
10/19/20	0.4	editing PAGA letter per JH's comments; research re compensation
10/19/20	0.2	editing paga ltr and email to Plaintiff re PAGA letter to review
10/19/20	0.1	PB send Plaintiff email re: attached draft paga letter for review;
10/19/20	0.1	PB read Plaintiff email re: semester dates;
10/19/20	0.1	PB send Plaintiff email re: comments/edits re PAGA;
10/20/20	0.1	PB send AC email re: submit and mail the attached PAGA notice
10/23/20	0.1	PB read AC email re: course data online; attached draft complaint and academic calendar
10/28/20	1.1	editing AC's draft complaint
10/28/20	0.1	discussing with JH re edits to the draft complaint
10/28/20	0.1	PB send AC email re: complaint with edits;
10/29/20	0.1	PB read AC email re: PAGA claims;
10/29/20	0.1	PB send JH email re: client work info;
10/29/20	0.1	PB read AC email re: complaint w/ no meal breaks
11/3/20	0.1	PB read AC email re: wage statements link and Plaintiff file request
11/3/20	0.4	going over with JH and discussion theory of unpaid wages claim
11/5/20	0.8	call with Plaintiff re unpaid wage claims
11/5/20	0.3	PB review Plaintiff email re: course info and descriptions
11/9/20	0.2	reviewing JH's edits to complaint
11/9/20	0.1	PB read JH email re: attached complaint
11/10/20	0.2	discussion with JH re complaint allegations, editing after JH's revisions
11/11/20	0.1	PB send JH email re: meal break and injunctive relief;
11/11/20	0.1	PB read JH email re: meal break and injunctive relief;
11/11/20	0.1	JH send PB email re: meal break and injunctive relief;
12/22/20	0.1	PB read AC email re: amended complaint and PAGA notice for filing;
12/22/20	0.1	PB read JH email re: review amended complaint and PAGA notice;
12/23/20	0.4	reviewing and editing draft amended complaint
1/4/21	0.3	reviewing amended complaint (including reviewing paga notice)
1/4/21	0.1	PB read AC email re: attached amended complaint for review;
1/4/21	0.1	PB send AC email re: uploading filed PAGA;
1/4/21	0.1	PB send AC email re: attached redlined FAC;
1/8/21	0.1	PB read AC email re: attached defendant's answer to plaintiff's complaint;
1/12/21	0.1	PB read AC email re: defendant's answer to plaintiff's complaint; initial CMC (1/19) off calendar;
1/14/21	0.1	PB read Court notice re: Judge Waters order re Case reassignment and CMC to be continued;
2/2/21	0.1	PB read, review re: La Sierra University's Answer to Plaintiff's First Amended Complaint
2/25/21	0.1	PB read opposing counsel email re: courtesy copy of the Joint Case Management Statement
2/26/21	0.1	PB read Dept 2 email re: telephonic appearance;
3/1/21	0.1	discussion re cmc and handling it
3/2/21	0.1	PB read AC email re: CMC statement and dial in info
3/4/21	0.1	PB read AC email re: reassigned to David Chapman;
3/30/21	0.1	PB review notice of telephonic appearance;
5/14/21	0.1	discussion w/ JH re mediation brief
6/2/21	0.2	discussion re data and mediation brief with JH
6/2/21	0.1	PB read JH email re: attached data points;
6/2/21	0.1	PB read opposing counsel email re: additional documents produced subject to the mediation privilege
6/2/21	0.2	PB emails x4 with AB re: latest version of the mediation brief; appendix; documents re: ministerial exception

6/3/21	0.1	PB read opposing counsel email re: additional documents subject to the mediation privilege
6/3/21	0.1	PB send JH email re: list of documents produced;
6/3/21	0.1	PB read opposing counsel email re: requested data points; copy of PAGA letter
6/3/21	0.1	PB send opposing counsel email re: PAGA Notice attached
6/3/21	2.7	reviewing docs produced in discovery, reviewing data analysis and data produced by Defendant, and editing mediation brief
6/4/21	0.2	discussion with JH re mediation brief/damages analysis
6/4/21	0.1	PB emails x2 with JH email re: expense reimbursement policy applicable to Class Members
6/4/21	0.1	PB send opposing counsel email re: update on brief and documents/data
6/4/21	0.1	PB send MD email re: data discrepancies in workweeks and pay periods numbers;
6/4/21	0.1	PB read MD email re: pay period and workweek counts
6/4/21	0.1	PB send AB email re: Plaintiff's contracts; time to talk re: brief
6/4/21	0.1	PB read AB email re: attached are Plaintiff's contracts. I can chat anytime in the next two hours;
6/4/21	0.1	PB read AB email re: pay stubs and exhibits;
6/4/21	1.2	editing mediation brief
6/4/21	0.2	discussion with JH re mediation brief
6/4/21	1.7	reviewing docs and editing mediation brief
6/5/21	2.3	research re ministerial exception and continuing to edit mediation brief
6/6/21	0.1	PB emails x2 with JH re: attached revised mediation brief; decision re ministerial exemption
6/7/21	0.3	making additional edits/clean up to mediation brief before sending to AB to finalize
6/7/21	0.1	discussion with AB re edits to mediation brief
6/7/21	0.7	reviewing final draft of brief and exhibits, and making edits to both
6/7/21	0.1	PB read AC email re: attached draft settlement agreement for review;
6/7/21	0.1	PB emails x4 with AB email re: finalize the mediation brief
6/8/21	0.9	finalizing mediation brief, exhibits, making final edits to exhibits
6/8/21	0.1	PB send Marlin email re: Plaintiff's mediation brief with exhibit
6/8/21	0.1	PB send Marlin email re: mediation attendance
6/8/21	0.1	PB read opposing counsel email re: Defendant's Mediation Brief
6/9/21	0.1	PB read Marlin email re: attendance at mediation
6/9/21	0.1	PB send JH email re: attendance at mediation
6/11/21	0.7	reading La Sierra mediation brief; discussion with JH
6/14/21	6.5	attend mediation
6/14/21	0.1	PB read opposing counsel email re: revised MOU;
6/14/21	0.1	PB send opposing counsel email re: redlined MOU;
6/14/21	0.1	PB read Marlin email re: final version of MOU
6/15/21	0.1	discussion with AC re amended complaint
6/15/21	0.1	PB read AC email re: draft settlement, notice, and amended complaint
6/17/21	0.5	reviewing and editing AC's draft Settlement Agreement
6/17/21	0.3	review class notice and edit
7/2/21	0.1	PB read AC email re: Defendant's edits to the Settlement
7/8/21	0.1	PB read AC email re: defendant redlined SA; discussion re edits
7/8/21	0.1	PB read AB email re: LSU survey of class members
7/10/21	0.1	PB read AB email re: draft preliminary approval papers
7/14/21	0.4	reviewing prelim app papers, and reviewing damages calc to respond to AC's question
7/14/21	0.2	PB 4x email with AC email re: data points for Kullar; re-classification of adjuncts
7/15/21	0.2	PB emails x3 with AC email re: data points for Kullar
7/15/21	0.1	PB read AC email re: Settlements approved by Judge Bermudez
7/31/21	0.1	PB emails x3 with AC, JH re: status of settlement agreement
8/3/21	0.1	discussion with AC re paga release/period
8/6/21	0.2	discussion with AC re prelim app/2802 claim
8/10/21	0.3	reviewing prelim app mpa
9/9/21	0.2	review cy pres decl
10/13/21	0.1	PB read AC email re: motion granted re prelim approval, hearing off calendar;

10/25/21	0.1	PB read CPT email re: Request for Approval of Administration Timeline & Mailing Documents;
11/15/21	0.1	PB read CPT email re: attached prelim calculations for approval;
11/18/21	0.1	PB read CPT email re: confirmation of mailing;
11/26/21	0.1	PB read AC email re: attached draft decl. for review and CMO requirements;
12/10/21	0.1	PB read AC email re: objections received;
12/13/21	0.1	PB read AC email re: objection form
1/6/22	0.1	PB read AC email re: CM order statement; consider expert decl. re: fees
1/6/22	0.1	PB read CPT email re: attached additional opt out;
1/14/22	0.1	PB read CPT email re: attached weekly report;
1/21/22	0.1	PB read CPT email re: update re disputes;
1/28/22	0.1	PB read CPT email re: attached weekly report;
2/1/22	0.1	PB read CPT email re: Request for Approval of Revised Preliminary Calculations;
2/3/22	0.1	PB read CPT email re: attached weekly report;
2/3/22	0.1	PB read Erin email re: attached additional opt out;
2/7/22	0.1	discussion with AC re corrected notice to adjunct class
2/10/22	0.1	PB read CPT email re: confirmation of mailing;
2/18/22	0.1	PB read CPT email re: attached weekly report;
3/11/22	0.1	PB read CPT email re: attached weekly report;
3/11/22	0.1	PB read CPT email re: attached weekly report;
3/18/22	0.1	PB read CPT email re: attached weekly report;
3/21/22	0.1	PB read CPT email re: attached draft decl. re request for approval
3/25/22	0.1	PB read CPT email re: attached weekly report;
3/30/22	0.1	PB read AC email re: attached plaintiff decl. for review;
4/1/22	0.1	PB read CPT email re: attached weekly report;

ADRIAN BARNES, ESQ. BILLING RECORDS

Date	Hours	Description
5/19/21	7.2	Draft mediation brief; review case file
5/20/21	6.9	Draft mediation brief; conference with Ari Cherniak
5/25/21	7.2	Review additional documents from Defendant; revise mediation brief; zoom meetings with Ari Cherniak and Julian Hammond
5/26/21	1.2	Review data and calculate damages
5/27/21	3.9	Review and revise mediation brief
6/1/21	3.7	Review data and draft table for mediation brief
6/2/21	0.4	Review and revise mediation brief; correspond with Polina Brandler regarding same
6/4/21	0.3	Conference with Polina Brandler regarding mediation brief
6/7/21	5.3	Revise and finalize mediation brief; conferences with Polina Brandler regarding same
6/11/21	2.9	Review defendant's mediation brief; prepare for mediation
6/14/21	7.3	Prepare for mediation; attend mediation
7/6/21	6.4	Draft motion for preliminary approval
7/7/21	7.4	Draft motion for preliminary approval and supporting papers
7/8/21	7.3	Draft motion for preliminary approval and supporting papers
7/9/21	5.4	Draft motion for preliminary approval and supporting papers
7/13/21	0.3	Review email from AC regarding motion for preliminary approval; draft and send response to same
7/14/21	0.2	Conference with Ari Cherniak re: motion to preliminary approval

EXHIBIT 3

1 JULIAN HAMMOND (SBN 268489)
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2 POLINA BRANDLER (SBN 269086)
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3 ARI CHERNIAK (SBN 290071)
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6 (310) 295-2385 (Fax)

7 *Attorneys for Plaintiff and the Class*

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10 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**

11 **COUNTY OF ALAMEDA**

12
13 **JONATHAN FISHER**, individually and on
behalf of all others similarly situated,

14 Plaintiffs,

15 vs.

16
17 MONEYGRAM...,

18 Defendant

CASE NO. RG19009280

Assigned for All Purposes to the
Hon. Evelio M. Grillo, Dept. 21

**DECLARATION OF RICHARD M.
PEARL IN SUPPORT OF PLAINTIFF'S
MOTION FOR AWARD OF
REASONABLE ATTORNEYS' FEES**

Date: November 19, 2021

Time: 10:00 a.m.

Dept: 21

RESERVATION NO. R-2298622

Complaint Filed: March 4, 2019

1 I, RICHARD M. PEARL, hereby declare the following:

2 1. I am a member in good standing of the California State Bar. I am in private practice as the
3 principal of my own law firm, the Law Offices of Richard M. Pearl, in Berkeley, California. I specialize
4 in issues related to court-awarded attorneys' fees, including the representation of parties in fee litigation
5 and appeals, testifying as an expert witness, and serving as a mediator and arbitrator in disputes concerning
6 attorneys' fees and related issues. In this case, I have been asked by counsel for Plaintiff Jonathan Fisher
7 al. ("Class Counsel") to render my opinion as to the reasonableness of the hourly rates they are requesting
8 as part of the lodestar cross-check in this matter.

9 2. To form my opinion, I have reviewed materials that describe and underlie this matter,
10 including the declaration of Julian Hammond and Plaintiff's draft Memorandum of Points and Authorities
11 ISO Motion for Reasonable Attorneys' Fees and Costs. I also have been made aware of the backgrounds
12 and experience of each biller.

13 3. I also have communicated about the case with Plaintiffs' attorneys Julian Hammond and
14 Ari Cherniak.

15 MY QUALIFICATIONS

16 4. Briefly summarized, my background is as follows: I am a 1969 graduate of Berkeley Law
17 School (then Boalt Hall), University of California, Berkeley, California. I took the California Bar
18 Examination in August 1969 and passed it in November of that year, but because I was working as an
19 attorney in Atlanta, Georgia for the Legal Aid Society of Atlanta (LASA), I was not admitted to the
20 California Bar until February 1970. I worked for LASA until the summer of 1971, when I then went to
21 work in California's Central Valley for California Rural Legal Assistance, Inc. (CRLA), a statewide legal
22 services program. From 1977 to 1982, I was CRLA's Director of Litigation, supervising more than fifty
23 attorneys. In 1982, I went into private practice, first in a small law firm, then as a sole practitioner.
24 Martindale Hubbell rates my law firm "AV." I also have been selected as a Northern California "Super
25 Lawyer" in Appellate Law for 2005, 2006, 2007, 2008, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017,
26 2018, 2019, 2020, and 2021. A copy of my Resume is attached hereto as **Exhibit A**.

27 5. Since 1982, my practice has been a general civil litigation and appellate practice, with an
28

1 emphasis on cases and appeals involving court-awarded attorneys’ fees. I have lectured and written
2 extensively on court-awarded attorneys’ fees. I have been a member of the California State Bar’s
3 Attorneys’ Fees Task Force and have testified before the State Bar Board of Governors and the California
4 Legislature on attorneys’ fee issues. I am the author of California Attorney Fee Awards (3d ed Cal. CEB
5 2010) and its 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, and March 2021 Supplements.
6 I also was the author of California Attorney Fee Awards, 2d Ed. (Calif. Cont. Ed. of Bar 1994), and its
7 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, and 2008 Supplements.
8 Many courts have referred to this treatise as “[t]he leading California attorney fee treatise.” *Calvo Fisher*
9 *& Jacob LLP v. Lujan*, 234 Cal. App. 4th 608, 621 (2015); *see, e.g., Int’l Billing Servs., Inc. v. Emigh*, 84
10 Cal. App. 4th 1175, 1193 (2000) (“the leading treatise”); *Orozco v. WPV San Jose, LLC*, 36 Cal. App. 5th
11 375, 409 (2019) (“a leading treatise on California attorney’s fees”). It also has been cited by the California
12 Supreme Court and Court of Appeal on many occasions. *See, e.g., Graham v. DaimlerChrysler Corp.*, 34
13 Cal. 4th 553, 576, 584 (2004); *Lolley v. Campbell*, 28 Cal. 4th 367, 373 (2002); *In re Conservatorship of*
14 *Whitley*, 50 Cal. 4th 1206, 1214–15, 1217 (2010)); *Yost v. Forestiere*, 51 Cal. App. 5th 509, 530 n. 8
15 (2020); *Doe v. Regents of Univ. of California*, 51 Cal. App. 5th 531, 547 (2020); *Highland Springs*
16 *Conference & Training Ctr. v. City of Banning*, 42 Cal. App. 5th 416, 428 n. 11 (2019); *Sweetwater Union*
17 *High Sch. Dist. v. Julian Union Elementary Sch. Dist.*, 36 Cal. App. 5th 970, 988 (2019); *Hardie v.*
18 *Nationstar Mortg. LLC*, 32 Cal. App. 5th 714, 720 (2019); *Stratton v. Beck*, 30 Cal. App. 5th 901, 911
19 (2018); *Syers Props III, Inc. v. Rankin*, 226 Cal. App. 4th 691, 698, 700 (2014). California Superior
20 Courts also cite the treatise with approval. *See, e.g., Davis v. St. Jude Hosp.*, No.
21 30201200602596CUOECX, 2018 WL 7286170, at *4 (Orange Cty. Super. Ct. Aug. 31,
22 2018); *Hartshorne v. Metlife, Inc.*, No. BC576608, 2017 WL 1836635, at *10 (Los Angeles Super.
23 Ct. May 02, 2017). Federal courts also have cited it. *See In re Hurtado*, Case No. 09-16160-A-13, 2015
24 WL 6941127 (E.D. Cal. Nov. 6, 2015); *TruGreen Companies LLC v. Mower Brothers, Inc.*, 953 F.
25 Supp. 2d 1223, 1236 nn.50, 51 (D. Utah 2013). I also authored the 1984, 1985, 1987, 1988, 1990, 1991,
26 1992, and 1993 Supplements to its predecessor, CEB’s California Attorney’s Fees Award Practice. In
27 addition, I authored a federal manual on attorneys’ fees entitled Attorneys’ Fees: A Legal Services Practice
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1 Manual, published by the Legal Services Corporation. I also co-authored the chapter on “Attorney Fees”
2 in Volume 2 of CEB’s Wrongful Employment Termination Practice, 2d Ed. (1997). I also have trained
3 and presented on attorneys’ fees issues on countless occasions. including several times before the
4 California Employment Lawyers Association, Legal Aid at Work, and the California Department of Fair
5 Employment and Housing.

6 6. More than 95% of my practice is devoted to issues involving court-awarded attorney’s fees.
7 In addition to serving as an expert witness on attorneys’ fee matters (see ¶¶ 6 and 7, *infra*), I have been
8 counsel in over 200 attorneys’ fee applications in state and federal courts, primarily representing other
9 attorneys. I also have briefed and argued more than 40 appeals, at least 30 of which have involved
10 attorneys’ fees issues. I have successfully handled five cases in the California Supreme Court involving
11 court-awarded attorneys’ fees: (1) *Maria P. v. Riles* (2017) 43 Cal.3d 1281, which upheld a Code of Civil
12 Procedure (“C.C.P.”) section 1021.5 fee award based on a preliminary injunction obtained against the
13 State Superintendent of Education, despite the fact that the case ultimately was dismissed under C.C.P.
14 section 583; (2) *Delaney v. Baker* (1999) 20 Cal.4th 23, which held that heightened remedies, including
15 attorneys’ fees, are available in suits against nursing homes under California’s Elder Abuse Act; (3)
16 *Ketchum v. Moses* (2001) 24 Cal.4th 1122, which held, *inter alia*, that contingent risk multipliers remain
17 available under California attorney fee law, despite the United States Supreme Court’s contrary ruling on
18 federal law (note that in *Ketchum*, I was primary appellate counsel in the Court of Appeal and “second
19 chair” in the Supreme Court); (4) *Flannery v. Prentice* (2001) 26 Cal.4th 572, which held that in the
20 absence of an agreement to the contrary, statutory attorneys’ fees belong to the attorney whose services
21 they are based upon; and (5) *Graham v. DaimlerChrysler Corp.* (2004) 34 Cal.4th 553, which I handled,
22 along with trial counsel, in both the Court of Appeal and Supreme Court. I also represented and argued
23 on behalf of *amicus curiae* in *Conservatorship of McQueen* (2014) 59 Cal.4th 602, presenting the
24 argument relied upon by the Court. Along with the Western Center on Law and Poverty, I also prepared
25 and filed an *amicus curiae* brief in *Vasquez v. State of California* (2009) 45 Cal.4th 243. For an expanded
26 list of my appellate decisions, see Exhibit A, pp. 4-8.

27 7. I am frequently called upon to opine about the reasonableness of attorneys’ fees, and my
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1 testimony on that issue has been cited favorably by numerous state and federal courts. The following
2 California reported decisions have referenced my testimony favorably:

- 3 • *Sonoma Land Trust v. Thompson*, 63 Cal.App.5th 978, 986 (2021);
- 4 • *Kerkeles v. City of San Jose* (2015) 243 Cal.App.4th 88, 96, 105;
- 5 • *Habitat and Watershed Caretakers v. City of Santa Cruz* (2015) 2015 Cal. App. Unpub.
LEXIS 7156, 2015 WL 5827045;
- 6 • *Laffitte v. Robert Half Int'l Inc.* (2014) 231 Cal.App.4th 860, *aff'd* (2016) 1 Cal.5th 480;
- 7 • *In re Tobacco Cases I* (2013) 216 Cal.App.4th 570;
- 8 • *Heritage Pacific Financial, LLC v. Monroy* (2013) 215 Cal.App.4th 972;
- 9 • *Wilkinson v. South City Ford* (2010) 2010 Cal. App. Unpub. LEXIS 8680, 2010 WL
4292631;
- 10 • *Children's Hospital & Medical Center v. Bonta* (2002) 97 Cal.App.4th 740;
- 11 • *Church of Scientology v. Wollersheim* (1996) 42 Cal.App.4th 628;
- 12 • *Kaku v. City of Santa Clara*, No. 17CV319862, 2019 WL 331053, at *3 (Santa Clara Cty.
Super. Ct. Jan. 22, 2019);
- 13 • *Davis v. St. Jude Hosp.*, No. 30201200602596CUOECX, 2018 WL 7286170, at *4
(Orange Cty. Super. Ct. Aug. 31, 2018);
- 14 • *Hartshorne v. Metlife, Inc.*, No. BC576608, 2017 WL 1836635, at *10 (Los Angeles
Super. Ct. May 2, 2017).¹

15 8. Many federal cases have referenced my expert testimony favorably, including most
16 recently in *Human Rights Defense Center v. County of Napa*, 20-cv-01296-JCS, Doc. 50 (March 28,
17 2021). There, the Court stated that it had “place[d] significant weight on the opinion of Mr. Pearl that the
18 rates charged by all of the timekeepers listed above are reasonable and in line with the rates charged by
19 law firms that engage in federal civil litigation in the San Francisco Bay Area. Mr. Pearl has extensive
20 experience in the area of attorney billing rates in this district and has been widely relied upon by both
federal and state courts in Northern California [] in determining reasonable billing rates.” *Id.* at 18–19.

21 The following reported federal decisions also reference my expert testimony favorably:

- 22 • *Antoninetti v. Chipotle Mexican Grill, Inc.*, No. 08-55867 (9th Cir. 2012), Order filed
Dec. 26, 2012, at 6;
- 23 • *Prison Legal News v. Schwarzenegger* (9th Cir. 2010) 608 F.3d 446, 455 (the expert
24 declaration referred to is mine);
- 25 • *Independent Living Center of S. Cal. v. Kent* (C.D. Cal. 2020) 2020 U.S. Dist. LEXIS
13019;

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27 ¹ Many other trial courts also have relied on my testimony in unreported fee awards.

- 1 • *In re Transpacific Passenger Air Transportation Antitrust Litigation* (ND Cal 2019) 2019 WL 6327363, 2019=2 Trade Cases P 81,010
- 2 • *Ridgeway v. Wal-Mart Stores, Inc.* (N.D. Cal. 2017) 269 F. Supp. 3d 975, *aff'd on the*
- 3 *merits* (9th Cir. 2020) 269 F.3d 1066;
- 4 • *Beaver v. Tarsadia Hotels* (S.D. Cal. 2017) 2017 U.S. Dist. LEXIS 160214;
- 5 • *Notter v. City of Pleasant Hill* (N.D. Cal. 2017) 2017 U.S. Dist. LEXIS 197404, 2017 WL 5972698;
- 6 • *Villalpando v. Exel Direct, Inc.* (N.D. Cal. 2016) 2016 WL 1598663;
- 7 • *State Compensation Insurance Fund v. Khan et al*, Case No. SACV 12-01072-CJC (JCGx) (C.D. Cal.), Order Granting in Part and Denying in Part the Zaks Defendants' Motion for Attorneys' Fees, filed July 6, 2016 (Dkt. No. 408);
- 8 • *In re Cathode Ray Tube Antitrust Litig.*, Master File No. 3:07-cv-5944 JST, MDL No. 1917 (N.D. Cal. 2016) 2016 U.S. Dist. LEXIS 24951 (Report And Recommendation Of Special Master Re Motions (1) To Approve Indirect Purchaser Plaintiffs' Settlements With the Phillips, Panasonic, Hitachi, Toshiba, Samsung SDI, Technicolor, And Technologies Displays Americas Defendants, and (2) For Award Of Attorneys' Fees, Reimbursement Of Litigation Expenses, And Incentive Awards To Class Representative, Dkt. 4351, dated January 28, 2016, *adopted in relevant part*, 2016 U.S. Dist. LEXIS 88665;
- 9 • *Gutierrez v. Wells Fargo Bank* (N.D. Cal. 2015) 2015 U.S. Dist. LEXIS 67298;
- 10 • *Holman v. Experian Information Solutions, Inc.* (N.D. Cal. 2014) 2014 U.S. Dist. LEXIS 173698;
- 11 • *In re TFT-LCD (Flat Panel) Antitrust Litig.*, No. M 07-1827 SI, MDL No. 1827 (N.D. Cal.), Report and Recommendation of Special Master Re Motions for Attorneys' Fees And Other Amounts By Indirect-Purchaser Class Plaintiffs And State Attorneys General, Dkt. 7127, filed Nov. 9, 2012, *adopted in relevant part*, 2013 U.S. Dist. LEXIS 49885 (N.D. Cal. 2013);
- 12 • *Walsh v. Kindred Healthcare* (N.D. Cal. 2013) 2013 U.S. Dist. LEXIS 176319 (N.D. Cal. 2013);
- 13 • *A.D. v. California Highway Patrol* (N.D. Cal. 2009) 2009 U.S. Dist. LEXIS 110743, at *4, *rev'd on other grounds*, (9th Cir. 2013) 712 F.3d 446, *reaffirmed and additional fees awarded on remand*, (N.D. Cal. 2013) 2013 U.S. Dist. LEXIS 169275;
- 14 • *Hajro v. United States Citizenship & Immigration Service* (N.D. Cal. 2012) 900 F. Supp. 2d 1034, 1054;
- 15 • *Rosenfeld v. United States Dep't of Justice* (N.D. Cal. 2012) 904 F. Supp. 2d 988, 1002;
- 16 • *Garcia v. Resurgent Capital Servs.* (N.D. Cal. 2012) 2012 U.S. Dist. LEXIS 123889;
- 17 • *Stonebrae, L.P. v. Toll Bros., Inc.* (N.D. Cal. 2011) 2011 U.S. Dist. LEXIS 39832, at *9 (thorough discussion), *aff'd* (9th Cir. 2013) 2013 U.S. App. LEXIS 6369;
- 18 • *Armstrong v. Brown* (N.D. Cal. 2011) 2011 U.S. Dist. LEXIS 87428;
- 19 • *Lira v. Cate* (N.D. Cal. 2010) 2010 WL 727979;
- 20 • *Californians for Disability Rights, Inc. v. California Dep't of Transportation* (N.D. Cal. 2010) 2010 U.S. Dist. LEXIS 141030;
- 21 • *Nat'l Federation of the Blind v. Target Corp.* (N.D. Cal. 2009) 2009 U.S. Dist. LEXIS 67139;
- 22 • *Prison Legal News v. Schwarzenegger* (N.D. Cal. 2008) 561 F. Supp.2d 1095 (an earlier motion);
- 23
- 24
- 25
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- 1 • *Bancroft v. Trizechahn Corp.*, No. CV 02-2373 SVW (FMOx), Order Granting Plaintiffs
2 Reasonable Attorneys' Fees and Costs In the Amount of \$168,886.76, Dkt. 278 (C.D.
3 Cal. Aug. 14, 2006);
- 4 • *Willoughby v. DT Credit Corp.*, No. CV 05-05907 MMM (CWx), Order Awarding
5 Attorneys' Fees After Remand, Dkt. 65 (C.D. Cal. July 17, 2006);
- 6 • *Oberfelder v. City of Petaluma* (N.D. Cal. 2002) 2002 U.S. Dist. LEXIS 8635, aff'd (9th
7 Cir. 2003) 2003 U.S. App. LEXIS 11371.

8 9. In addition, I was the fee claimant's principal expert witness in several of the cases listed
9 below, including *Moen v. Regents of U.C.*, *National Federation of the Blind v. Uber*, *City of Oakland v.*
10 *Police and Fire Retirement System*, *Department of Fair Employment and Housing v. Law School*
11 *Admission Council*, *Kaku v. City of Santa Clara*, *Armstrong v. Brown*, and co-counsel in *Cornell v. City*
12 *& County of San Francisco*. I also have served as a consultant and expert witness for the California
13 Attorney General's office and the California Department of Fair Employment and Housing in several of
14 their affirmative fee motions. See, e.g., *Department of Fair Employment & Housing v. Law School*
15 *Admission Council, Inc.*, 2018 WL 57911869 (N.D. Cal. 2018); *In re Tobacco Cases I*, 216 Cal.App.4th
16 570 (2013).

17 **MY OPINION: COUNSEL'S HOURLY RATES ARE REASONABLE.**

18 10. In my opinion, the hourly rates requested by Class Counsel here are well within the range
19 of hourly rates charged by and awarded to San Francisco Bay Area attorneys of reasonably comparable
20 experience and expertise for comparably complex services.

21 11. Under California law, Plaintiff's counsel's rates are reasonable if those rates are "within
22 the range of reasonable rates charged by and judicially awarded comparable attorneys for comparable
23 work" in the applicable community. *Children's Hospital & Medical Center. v. Bonta* (2002) 97
24 Cal.App.4th 740, 783.

25 12. Through my writing and practice, I have become familiar with the non-contingent market
26 rates charged by attorneys in California and elsewhere. I have obtained this familiarity in several ways:
27 (1) by handling attorneys' fee litigation; (2) by discussing fees with other attorneys; (3) by obtaining
28 declarations regarding prevailing market rates in cases in which I represent attorneys seeking fees; and (4)
by reviewing attorneys' fee applications and awards in other cases, as well as surveys and articles on
attorney's fees in the legal newspapers and treatises.

13. Here, Class Counsel request the following 2021 market-based rates:²

Attorney	Position	Admission	Years	Rate
Julian Hammond	Principal	2000	21	\$825
Polina Brandler	Associate	2010	11	\$695
Ari Cherniak	Associate	2011	10	\$575
Adrian Barnes	Consultant	2007	14	\$625
Laura Ho	Partner	1994	27	\$990
Anne Bellows	Associate	2013	8	\$590
Ginger Grimes	Associate	2015	6	\$565
Katharine Fisher	Associate	2015	6	\$565
MC Linthicum	Law Clerk	2020	1	\$350
Scott Grimes	Sr. Paralegal		32	\$365
Stuart Kirkpatrick	Paralegal		9	\$350
Christian Giannini	Case Clerk		2	\$325
Daniel Edelman	Sr. Counsel	1969	52	\$945
Total				

14. Based on my experience, expertise and knowledge of counsel’s background, experience, and work product, it is my opinion that the hourly rates requested here are well within the range of non-contingent market rates charged for reasonably similar services by Bay Area attorneys of reasonably similar qualifications and experience. The following data supports my opinion:

A. Rates Previously Found Reasonable For Plaintiffs’ Counsel.

15. Initially, it is significant to me that the rates Plaintiff’s counsel request here or earlier versions thereof have been found reasonable by numerous other courts. See Hammond Decl., ¶ 54-55; Ho

² Lodestar-based fees generally are determined on the basis of current rates, *i.e.*, the attorneys’ rates at the time the fee motion is made, rather than the historical rates at the time the work was performed. This is a common and accepted practice to compensate attorneys for the delay in payment. *See Graham*, 34 Cal.4th at 583-84; *Robles v. Employment Development Dept.* (2019) 38 Cal.App.5th 191, 205; *See 2 Attorney Fee Awards* (Cont.Ed.Bar 3d ed. 2010 Mar. 2021 Supp.) § 9.111, p. 9-104 (listing other authorities).

(footnote continued on next page)

1 Decl., ¶ 15; Edelman Decl., ¶¶ 4-5. See *Margolin v Regional Planning Comm'n* (1982) 134 Cal.App.3d
2 999, 1005 (prior awards to counsel probative of rates requested).³

3 **B. Rates Found Reasonable in San Francisco Bay Area Cases**

4 16. Counsel's rates also are well within the range of hourly rates that have been found
5 reasonable by various Bay Area trial courts for reasonably comparable services:

6 **(1) 2020 Rates**

- 7 • In *Human Rights Defense Center v. County of Napa*, Order Granting In Part And Denying
8 In Part Motion For Attorneys' Fees, Costs And Expenses at 18, Doc. 50, No. 20-cv-01296
9 (N.D. Cal. March 28, 2021), a prisoner rights action, the court found that the following
10 2020 hourly rates were reasonable:

Firm	Title	Law School Grad. Year	Rate
Rosen Bien Galvan & Grunfeld LLP			
	Partner	1962	\$1,110
	Partner	1981	\$950
	Senior Counsel	2009	\$625
	Senior Paralegal	NA	\$350

- 17 • In *Planned Parenthood Fed'n of Am., Inc. v. Ctr. for Med. Progress*, No. 16-CV-00236-
18 WHO, 2020 WL 7626410 (N.D. Cal. Dec. 22, 2020), at * 3, a RICO action challenging the
19 defendants' invasive tactics, the court found that the following 2020 hourly rates were
20 reasonable:

Firm	Title	Bar Admission	Rate
Arnold & Porter Kaye Scholer LLP			
	Partner	1974	\$1,280

24 ³ Counsel's current rates reflect reasonable increases over awards in prior years. For example, in *Planned*
25 *Parenthood Federation of America, Inc. v. Center for Medical Progress* (N.D. Cal. Dec. 22, 2020) 2020
26 U.S. Dist. LEXIS 241035, at *13, the district court applied a 25% rate increase for the period from 2016
27 to 2020. Similar rate increases in the legal marketplace have been observed by commentators. *See, e.g.,*
28 *Will Billing Rates for Elite Firms Rise in 2020?*, The Recorder (California)(Online) (July 30, 2020);
Simons, Big Law Should Raise Partner Billing Rates 10+ Percent Now, The Recorder (Nov. 15, 2018) at
3 ("In a normal year, partner rates would go up around 5 or 6 percent").

Firm	Title	Bar Admission	Rate
	Partner	1993	\$1,150
	Partner	1990	\$1,085
	Partner	2005	\$1,015
	Partner	2002	\$925
	Senior Associate	2005	\$910
	Senior Associate	2012	\$910
	Senior Associate	2015	\$815
	Associate	2018	\$675
	Staff Attorney	2008	\$545
	Paralegal	NA	\$405
	Paralegal	NA	\$390
Planned Parenthood			
	General Counsel	1982	\$1,115
	Sr. Staff Attorney	2012	\$910

- In *Schneider v. Chipotle Mexican Grill*, 336 F.R.D. 588, 601 (N.D. Cal. 2020), a consumer class action, the court found the following 2020 rates for the putative class’s counsel were reasonable:

Firm	Title	Bar Admission	Rate
Kobre & Kim			
	Partner	1993	\$1,275
	Partner	1987	\$1,275
	Partner	1997	\$995
	Associate	2011	\$695
	Analyst	NA	\$495
	Legal Assistant	NA	\$195
	Legal Assistant	NA	\$195

- In *California Advocates for Nursing Home Reform v. Angell*, Alameda County Superior Court No. RG13700100, Order Awarding Attorneys’ Fees filed October 2, 2020, a writ of mandate challenging unconsented to mental health treatment, the court found that a reasonable hourly rate for the plaintiffs’ lead counsel, a 47 year attorney, was **\$875** per

hour (to which it also applied a 1.75 multiplier).

- In *Lashbrook v. City of San Jose*, N.D. Cal. Case No. 20-cv-01236-NC, a disability access class action, the court found the following hourly rates reasonable:

<u>Bar Admission Year</u>	<u>Rate</u>
1987	\$945
1992	\$895
2006	\$750
2017	\$415
Senior Paralegal	\$325
Paralegals	\$265-285

- In *Stiavetti v. Ahlin*, Alameda County Superior Court No. RG15-779731, Order Granting in Part Motion for Attorneys’ Fees filed May 1, 2020, a challenge to state agencies for subjecting persons found incompetent to stand trial to excessively long waits before being admitted to state hospitals, the court found the following 2020 hourly rates reasonable for Plaintiffs’ ACLU attorneys:

<u>Graduation Year</u>	<u>Rate</u>
1994	\$850
1996	\$775
1999	\$745
2004	\$650
2009	\$490
2014	\$325

- In *Lee One, LLC v. Facebook, Inc.*, N.D. Cal. No. 4:16-cv-06232-JSW, Order and Judgment Granting Motion for Final Approval of Class Action Settlement and Awarding Attorneys’ Fees, Costs, and Service Awards, filed June 26, 2020 [Doc. 211], a class action challenging Facebook’s systems for justifying the rates charged advertisers, the court approved a fee constituting 30% of the \$40 million settlement fund, and in cross-checking

that fee, found the following 2019 hourly rates reasonable (plus a 1.68 lodestar multiplier):

Law Firm	Title	Bar Date	Rate
Cohen Millstein Sellers & Toll			
	Partners	1983	\$940
		2000	\$790
		2004	\$740
	Associates	2012	\$545
		2014	\$505
	Staff Attorney	2012	\$395
	Contract Attorney	2003	\$385
	Law Clerk	2019	\$290
	Contract Attorneys	2014	\$250
		2017	\$250
Gibbs Law Group			
	Partners	1995	\$910
		2000	\$750
		2003	\$720
		2007	\$710
	Associates	2014	\$460
		2016	\$430
Eglet Adams			
	Partners	1988	\$870
		1998	\$800
		1999	\$690

		1999	\$650
	Associate	2011	\$450
	Contract Attorney	1998	\$200
	Investigator	--	\$490
	Paralegals	--	\$300-315

- In *Perez v. Rash Curtis & Associates*, N.D. Cal. No. 4:16-cv-03396-YGR, Order, *inter alia*, Granting in Part and Denying in Part Motion for an Award of Attorneys’ Fees, Costs, and Expenses, filed April 17, 2020 [Doc. 427], a consumer protection action under both federal and state law resulting in a \$267 million judgment, the court awarded counsel a percentage-based common fund fee of 25% of the fund, cross-checked against a lodestar-based fee comprised of a \$634.48 blended rate, and a lodestar multiplier ranging from 13.42 to 18.15 depending on the number of hours eventually spent. The 2020 hourly rates from which the blended rate was derived were as follows:

Admission to Bar	Rate
PARTNERS:	
1997	\$1,000
2002	\$850
2006	\$750
2009	\$650
2013	\$550
ASSOCIATES:	
2010	\$550
2013	\$525
2016	\$400
2017	\$375
2019	\$325
Law Clerk	\$300
Senior Litigation Support Spelist.	\$275-300
Litig. Support Spelist.	\$200-250

- In *In re Wells Fargo & Company Shareholder Derivative Litigation*, N.D. Cal. No. 16-cv-05541-JST, Order Granting Motion for Final Approval and Motion for Attorneys' Fees, filed April 7, 2020 [Doc. 312], a shareholder derivative class action, the court found the following 2020 hourly rates reasonable:

Lieff, Cabraser, Heimann & Bernstein LLP	Law School Graduation Year	Rate
	1972	\$1,075
	1998	\$950
	1993	\$900
	1984	\$850
	2000	\$775
	2001-2002	\$700
	2005	\$650
	2007	\$590
	2008	\$560
	2012	\$480-510
	2015	\$440
	2017	\$395
	Law Clerk	\$375-395
	Paralegal/Clerk	\$345-390
	Litigation Support/Research	\$345-495

- In *Moen v. Regents of Univ. of California*, Alameda County Superior Court No. RG10-530493, Order (1) Granting Final Approval of Class Settlement and (2) Granting Motion for Award of Fees and Costs, filed April 10, 2020, a class action to enforce contractual health care rights, this Court approved the following hourly rates as reasonable (indicating in addition that a 1.5 multiplier would have been applied but for the parties' agreed ceiling):

LAW FIRM	LAW SCHOOL GRADUATION	RATE
Law Offices of Dov Grunschlag	1966	\$975
Sinclair Law Office	1976	\$875
Calvo Fisher LLP	1976	\$875
	1990	\$775
	2000	\$650
	2004	\$625
	Senior Paralegal	\$300
	Paralegal	\$225

1 **(2) 2019 Rates**

- 2 • In *In re National Collegiate Athletic Assn. Athletic Grant-In-Aid Antitrust Litigation*, an
3 antitrust class action, the court found the following 2019 “hourly rates are reasonable.” *See*
4 Order Granting in Part and Denying in Part Plaintiffs’ Motion for Attorneys’ Fees,
5 Expenses, Service Awards, and Taxed Costs, Doc. 1259, at 4, No. 14-md-02541 (N.D. Cal.
6 Dec. 6, 2019).

7

Firm	Title	Bar Admission	Rate
Winston & Strawn LLP			
	Partner	1978	\$1,515
	Partner	1985	\$1,245
	Partner	2002	\$1,105
	Partner	1996	\$1,025
	Associate	2012	\$825
	Associate	2016	\$660
	Associate	2017	\$615

- 8
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- 14 • In an earlier decision in the same case, the court also found the following 2017 hourly rates
15 were “in line with market rates in this District.” *See id.* at Doc. 745 (N.D. Cal. Dec. 6,
16 2017).

17

Firm	Title	Bar Admission	Rate
Hagens Berman Sobol Shapiro LLP			
	Partner	1982	\$950
	Associate	1999	\$630
	Associate	2014	\$475
	Contract Attorney	2013	\$350
	Contract Attorney	2006	\$300
Pearson, Simon & Warshaw LLP			
	Partner	1983	\$1,035
	Partner	1981	\$1,035
	Of Counsel	2001	\$900
	Associate	2006	\$635
	Associate	2008	\$520

- In *Nevarez v. Forty Niners*, N.D. Cal. No. 5:16-cv-07013-LHK(SVK), Order Granting Motion for Final Approval of Class Action Settlement; Granting Motion for Service Awards; and Granting Motion for Attorney’s Fees, Costs, and Expenses, filed July 23, 2020 [Doc. 416], a disability-access class action involving Levi’s Stadium, the court found the following 2019 hourly rates reasonable:

Schneider Wallace Cottrell Konecky LLP:	Law School Grad.	Rate
	1993	\$925
	1977	\$875
	1997	\$840
	2015	\$680
	2014	\$625-\$680
	2007	\$625
	2017	\$575
	2009	\$725
	Paralegal	\$300
Goldstein Borgen Dardarian & Ho		
	1987	\$925
	2006	\$710
	2015	\$450
	2008	\$595
	2013	\$475
	2017	\$400
	Law Student	\$300
	Sr. Paralegals	\$325
	Paralegals	\$275-295

- In *Bartoni et al v. American Medical Response West*, Alameda County Superior Court No. RG08-382130, a meal and rest break class action involving Schneider Wallace and other counsel, the court’s Order Granting Plaintiffs’ Motions on Final Approval of Class Settlement filed July 12, 2019, this Court found the following 2019 hourly rates reasonable, based in part on my testimony:

///

LAW FIRM	BAR ADMISSION DATE	RATE	BILLING YEAR (Parentheticals indicate billers' experience levels and year when they last worked on the case)
Leonard Carder / Hinton Alfert Sumner & Kaufmann			
	1990	\$860	
	1999	\$710	
	2008	\$445	6th year (2014)
	2013	\$445	
Schneider Wallace Cottrell Konecky Wotkyns			
	1996	\$835	
	2009	\$525	
	2014	\$450	
	1997	\$675	15th year (partner) (2012)
	2004	\$475	5th year (2009)
	2005	\$450	4th year (2008)
	2006	\$425	3rd year (2009)
	2007	\$400	2nd year (2009)
	2003	\$525	10th year (2013)
	2014	\$350	1st year (2014)
Kralowec Law, P.C.			
	1992	\$810	
	1986	\$795	
	2008	\$500	6th year (2014)
	2008	\$525	7th year (2016)
Schubert Jonckheer & Kolbe LLP			
	1992	\$600	18th year (2010) (2010)

- In *National Federation of the Blind of California v. Uber Technologies, Inc.*, N.D. Cal. No. 14-cv-04086 NC Amended Order Granting in Part Plaintiffs' Motion for Attorneys' Fees and Costs, filed November 8, 2019 (Dkt. No. 203), a class action against Uber alleging that

1 it violated federal antidiscrimination laws by allowing its drivers to refuse to accept service
 2 dogs, the court found the following 2019 hourly rates reasonable for monitoring Uber's
 3 compliance with the settlement:

Rosen Bien Galvan & Grunfeld LLP	
Class	Rate
1997	\$800
2011	\$525
2016	\$400
Senior Paralegal	\$350
Paralegals	\$250-275

Disability Rights Advocates	
1998	\$785
2014	\$470
2014	\$425
Paralegals	\$230-275

- In *Shaw et al v. AMN Service, LLC et al*, N.D. Cal. No. 3:16-cv-02816 JCS, Order Granting Plaintiffs' Motion for Reasonable Attorneys' Fees and Costs, filed May 31, 2019 [Doc. 167], a wage and hour class action, based in part on my testimony the court found the following 2019 hourly rates reasonable, before applying a 2.4 lodestar multiplier:

BAR ADMISSION DATE	RATE
1996	\$835
2009	\$750
2014	\$675
1996 (Florida)	\$600
2016	\$400
2017	\$380

23 **(3) 2018 Rates.**

- In *Department of Fair Employment and Housing v. Law School Admission Council, Inc.*, N.D. Cal. No. 12-cv-08130-JCS, filed Nov. 5, 2018, reported at 2018 WL 5791869, 2018 U.S. Dist. LEXIS 189191, an action for civil contempt based on violation of a consent decree, the court found the following 2018 hourly rates reasonable:

Years of Experience	Rate
35	\$850
5 and 6	\$425
Law Clerk and 1st year	\$290

- In *Cornell v. City & County of San Francisco*, San Francisco Superior Court No. CGC-11-509240, Fee Order filed Oct. 9, 2018 (on remand from *Cornell v. City & County of San Francisco* (2017) 17 Cal.App.5th 766), an individual police misconduct/employment case, the trial court found the following 2018 hourly rates reasonable for appellate work, before applying a 1.25 multiplier:

Years of Experience:	Rates:
49	\$827
27	\$800
23	\$800
9	\$475
6	\$425

- In *Cole v. County of Santa Clara*, N.D. Cal. No. 16-CV-06594-LHK, Order Granting Final Approval of Class Settlement and Motion for Attorneys’ Fees, filed March 21, 2019, a disability rights class action, the court found the following 2018 hourly rates reasonable:

Bar Admission Date	Rate
Rosen, Bien, Galvan & Grunfeld LLP	
2006	\$650
2010	\$525
2016	\$375
Paralegals	\$225-340
Disability Rights Advocates	
1998	\$775
2005	\$655
2014	\$425
Paralegals	\$230

- In *In re Anthem, Inc. Data Breach Litigation*, the court found the following 2017 billing rates were “reasonable in light of prevailing market rates in this district.” See *In re Anthem, Inc. Data Breach Litig.*, No. 15-MD-02617, 2018 WL 3960068, at *16 (N.D. Cal. Aug. 17, 2018):

Firm	Title	Law School Grad. Year	Rate
Altshuler Berzon			
	Partner	1992	\$860
	Partner	1994	\$820

Firm	Title	Law School Grad. Year	Rate
	Partner	1998	\$770
	Partner	2001	\$690
	Associate	2010	\$460
	Associate	2012	\$405
	Legal Clerks	NA	\$285
	Paralegals	NA	\$250
Gibbs Law Group			
	Partner	1995	\$805
	Partner	1988	\$740
	Partner	2000	\$685
	Partner	2003	\$660
	Partner	2004	\$635
	Partner	2007	\$605
	Partner	2008	\$575
	Associate	2011	\$525
	Associate	2012	\$450
	Associate	2014	\$415
	Associate	2012	\$400
	Associate	2000	\$395
	Associate	2008	\$375
	Associate	2015	\$365
	Associate	2015	\$350
	Associate	2016	\$340
	Contract Attorney	2014	\$240
	Paralegals		\$190-\$220
Lieff Cabraser Heimann & Bernstein			
	Partner	1989	\$900
	Partner	2001	\$675
	Partner	2002	\$650
	Partner	2004	\$625
	Partner	2006	\$565
	Partner	2006	\$510
	Associate	2011	\$455

Firm	Title	Law School Grad. Year	Rate
	Associate	2015	\$370
	Contract Attorneys	1994-2017	\$240

C. Hourly Rates Charged by Other Law Firms.

17. Plaintiff's counsel's rates also are well within the range of the standard hourly non-contingent rates charged by numerous Bay Area law firms that regularly engage in civil litigation of comparable complexity. A chart showing the hourly rates charged by 36 of those San Francisco Bay Area law firms, as stated in court filings, depositions, surveys, or other reliable sources, is attached hereto as **Exhibit B**. The rates requested here are well within the range of those rates.

D. Hourly Rate Surveys

18. Relevant surveys also support Class Counsel's requested rates. For example:

- The 2020 Mid-Year Real Rate Report survey compiled by Wolters Kluwer surveys the hourly rates charged in mid-year 2020 by hundreds of San Francisco area attorneys. The "High Level Data Cuts" section at page 31 of the Report, attached hereto as **Exhibit C**, supports counsel's requested rates. Specifically, page 31 describes the mid-year 2020 rates charged by 193 San Francisco partners and 121 associates who practiced "Litigation." For that category, the mid-year 2020 litigation rate for the Third Quartile of surveyed attorneys was **\$950** per hour for partners and **\$567** for associates. Page 35 describes the mid-year 2020 rates charged by 202 San Francisco partners with 21 or more years of experience. For that category, the Third Quartile 2020 partner rate was **\$989** per hour. For 112 partners with fewer than 21 years of experience, it was **\$925** per hour. For associates, page 39 shows that the mid-year 2020 Third Quartile rate was **\$646** for 74 associates with 7 or more years, **\$598** for those 44 associates with 3-6 years, and **\$438** for those 14 attorneys surveyed with fewer than 3 years. Given counsel's expertise and experience, the high-caliber work performed, and the results obtained here, in my opinion the Third Quartile are the most appropriate measure. The rates sought by Plaintiff's

1 attorneys in this motion are well within these published rates. Moreover, in my
2 experience, since mid-year 2020, many San Francisco Area firms have raised their rates
3 by at least 4-6%.

- 4 • The 2018 Peer Monitor Public Rates survey, attached hereto as **Exhibit D**, shows that
5 Plaintiffs' counsel's rates here are well within the range of hourly rates billed by other
6 highly regarded Bay Area law firms.

7 19. The hourly rates set forth above are those charged where full payment is expected promptly
8 upon the rendition of the billing and without consideration of factors other than hours and rates. If any
9 substantial part of the payment were to be contingent or deferred for any substantial period of time, for
10 example, the fee arrangement would be adjusted accordingly to compensate the attorneys for those factors.

11 20. The expense and risk of public interest litigation have not diminished over the years; to the
12 contrary, these cases are in many ways more difficult than ever. As a result, fewer and fewer attorneys
13 and firms are willing to take on such litigation, and the few who are willing to do so can only continue if
14 their fee awards reflect true market value.

15 If called as a witness, I could and would competently testify from my personal knowledge to the
16 facts stated herein.

17 I declare under penalty of perjury under the laws of the State of California that the foregoing is
18 true and correct. Executed this 8th day of October, 2021, in Berkeley, California.

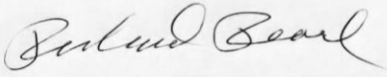
19
20 
21 _____
22 RICHARD M. PEARL

EXHIBIT A

RESUME OF RICHARD M. PEARL

RICHARD M. PEARL
LAW OFFICES OF RICHARD M. PEARL
1816 Fifth Street
Berkeley, CA 94710
(510) 649-0810
(510) 548-3143 (facsimile)
rpearl@interx.net (e-mail)

EDUCATION

University of California, Berkeley, B.A., Economics (June 1966)
Boalt Hall School of Law, Berkeley, J.D. (June 1969)

BAR MEMBERSHIP

Member, State Bar of California (admitted February 1970)
Member, State Bar of Georgia (admitted June 1970) (inactive)
Admitted to practice before all California State Courts; the United States Supreme Court; the United States Court of Appeals for the District of Columbia and Ninth Circuits; the United States District Courts for the Northern, Central, Eastern, and Southern Districts of California, for the District of Arizona, and for the Northern District of Georgia; and the Georgia Civil and Superior Courts and Court of Appeals.

EMPLOYMENT

LAW OFFICES OF RICHARD M. PEARL (April 1987 to Present): Civil litigation practice (AV rating), with emphasis on court-awarded attorney's fees, class actions, and appellate practice. Selected Northern California "Super Lawyer" in Appellate Law for 2005, 2006, 2007, 2008, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, and 2019.

QUALIFIED APPELLATE MEDIATOR, APPELLATE MEDIATION PROGRAM, California Court of Appeal, First Appellate District (October 2000 to 2013) (program terminated).

ADJUNCT PROFESSOR, HASTINGS COLLEGE OF THE LAW (January 1988 to 2014): Taught *Public Interest Law Practice*, a 2-unit course that focused on the history, strategies, and issues involved in the practice of public interest law.

PEARL, McNEILL & GILLESPIE, Partner (May 1982 to March 1987): General civil litigation practice, as described above.

CALIFORNIA RURAL LEGAL ASSISTANCE, INC. (July 1971 to September 1983) (part-time May 1982 to September 1983):

Director of Litigation (July 1977 to July 1982)

Responsibilities: Oversaw and supervised litigation of more than 50 attorneys in CRLA's 15 field offices; administered and supervised staff of 4-6 Regional Counsel; promulgated litigation policies and procedures for program; participated in complex civil litigation.

Regional Counsel (July 1982 to September 1983 part-time)

Responsibilities: Served as co-counsel to CRLA field attorneys on complex projects; provided technical assistance and training to CRLA field offices; oversaw CRLA attorney's fee cases; served as counsel on major litigation.

Directing Attorney, Cooperative Legal Services Center (February 1974 to July 1977) (Staff Attorney February 1974 to October 1975)

Responsibilities: Served as co-counsel on major litigation with legal services attorneys in small legal services offices throughout California; supervised and administered staff of four senior legal services attorneys and support staff.

Directing Attorney, CRLA McFarland Office (July 1971 to February 1974) (Staff Attorney July 1971 to February 1972)

Responsibilities: Provided legal representation to low income persons and groups in Kern, King, and Tulare Counties; supervised all litigation and administered staff of ten.

HASTINGS COLLEGE OF THE LAW, Instructor, Legal Writing and Research Program (August 1974 to June 1978)

Responsibilities: Instructed 20 to 25 first year students in legal writing and research.

CALIFORNIA AGRICULTURAL LABOR RELATIONS BOARD, Staff Attorney, General Counsel's Office (November 1975 to January 1976, while on leave from CRLA)

Responsibilities: Prosecuted unfair labor practice charges before Administrative Law Judges and the A.L.R.B. and represented the A.L.R.B. in state court proceedings.

ATLANTA LEGAL AID SOCIETY, Staff Attorney (October 1969 to June 1971)

Responsibilities: Represented low-income persons and groups as part of 36-lawyer legal services program located in Atlanta, Georgia.

PUBLICATIONS

Pearl, *California Attorney Fee Awards, Third Edition* (Cal. Cont. Ed. Bar 2010) and February 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, and March 2019 Supplements

Pearl, *California Attorney Fee Awards, Second Edition* (Cal. Cont. Ed. Bar 1994), and 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, and 2008 Supplements

Graham v. DaimlerChrysler Corp. and *Tipton-Whittingham v. City of Los Angeles*, Civil Litigation Reporter (Cal. Cont. Ed. Bar Feb. 2005)

Current Issues in Attorneys' Fee Litigation, California Labor and Employment Law Quarterly (September 2002 and November 2002)

Flannery v. Prentice: Shifting Attitudes Toward Fee Agreements and Fee-Shifting Statutes, Civil Litigation Reporter (Cal. Cont. Ed. Bar Nov. 2001)

A Practical Introduction to Attorney's Fees, Environmental Law News (Summer 1995)

Wrongful Employment Termination Practice, Second Edition (Cal. Cont. Ed. Bar 1997) (co-authored chapter on "Attorney Fees")

California Attorney's Fees Award Practice (Cal. Cont. Ed. Bar 1982) (edited), and 1984 through 1993 Supplements

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PUBLIC SERVICE

Member, Attorneys' Fee Task Force, California State Bar

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EXHIBIT B

Exhibit B

Rates Charged by San Francisco Bay Area Law Firms

<i>Altshuler Berzon LLP</i>		
2018 Rates	Graduation Year	Rate
	1968-1983	\$940
	1985	\$920
	1989	\$900
	1991	\$885
	1992	\$875
	1994	\$835
	1998	\$795
	2000	\$740
	2001	\$725
	2008	\$540
	2009	\$515
	2010	\$485
	2012	\$435
	2013	\$415
	2014	\$390
	2015	\$365
	Law Clerks	\$285
	Paralegals	\$250
2017 Rates	Years of Experience/Level	Rates
	Senior Partners	\$930
	Junior Partners (1991-2001)	\$875-690
	Associates (2008-2013)	\$510-365
	Paralegals	\$250
2015 Rates	Years of Experience/Level	Rates
	32	\$895
	Junior Partners	\$825-630

	Associates	\$450-340
	Paralegals	\$250
<i>Arnold Porter LLP</i>		
2021 Rates	Level	Rates
	Partners	\$750-\$1,150
	Senior Counsel	\$910-\$1,280
	Associates	\$545-\$910
	Paralegals	\$390-\$405
2015 Rates	Level	Rates
	Partner	Up to \$1,085
	Associates	Up to \$710
2014 Rates	Years of Experience	Rates
	49	\$995
	45	\$720
	39	\$655
<i>The Arns Law Firm</i>		
2021 Rates	Law School Grad. Date	Rate
	1975	\$950
	2010	\$575
	2013	\$525
<i>Boies Schiller & Flexner LLP</i>		
2017 Rates	Bar Admittance or Law School Graduation	Rates
	1986	\$1,049
	2006	\$972
	1999-2000	\$830
	2004	\$760
	2006	\$680
	2007	\$714
	2009	\$800

2016 Rates	Bar Admittance	Rates
	1988	\$960
	2000	\$830
	2001	\$880
<i>Burson & Fisher</i>		
2020 Rates:	Bar Admission Year	Rate
	PARTNERS:	
	1997	\$1,000
	2002	\$850
	2006	\$750
	2009	\$650
	2013	\$550
	ASSOCIATES:	
	2010	\$550
	2013	\$525
	2016	\$400
	2017	\$375
	2019	\$325
	Law Clerk	\$300
	Senior Litigation Support Specialist	\$275-300
	Litigation Support Specialist	\$200-250

<i>Cooley LLP</i>		
2021 Rates:	Years of Experience	Rates
	27 (Partner)	\$1,415
	27 (Special Counsel)	\$1,210
2020 Rates	Years of Experience	Rates
	26 (Partner)	\$1,275
	26 (Special Counsel)	\$1,140
	12 (Associate)	\$1,120
	22	\$902
2017 Rates	Years of Experience	Rates
	22	\$902
2014 Rates	Years of Experience	Rates
	31	\$1,095
	17	\$770
	9	\$685
<i>Cotchett, Pitre & McCarthy, LLP</i>		
2019 Rates	Year of CA Bar Admission	Rates
	1965	\$950
	1992	\$925
	1994	\$850
	2006	\$750
	Senior Associate	\$600
	Associates	\$375-425
	Paralegals, Case Assistants, Law Clerks	\$225-325
<i>Duane Morris LLP</i>		
2018 Rates	Bar Admission Year	Rates
	1973	\$1,005
	2008	\$605
	2011	\$450
	2017	\$355
	Sr. Paralegal	\$395

2016 Rates	Years of Experience	Rates
	43	\$880
	41	\$880
	26	\$720
	25	\$695
<i>Farella Braun + Martel</i>	Bar Admission	Rates
2020 Rates		
	1972	\$1250
	1980	\$975
	1982	\$925
	1985	\$935
	1991	\$795
	1994	\$895
	2003	\$785
	2011 (Assoc./Partner)	\$710
	Associates	
	2012	\$675
	2014	\$650
	2015	\$560
	2017	\$460
	2018	\$515
	Paralegals	\$285-355
	Case Clerk	\$190
	Practice Support Supervisor	\$325
	Practice Support Proj. Mgr.	\$285
<i>Fenwick & West</i>		
2021 Rates	Cal. Bar Admission	Rates
	1995	\$1,040
	2001	\$860
	2005	\$745
	2010	\$720

	2011	\$665
	2016	\$710
	2017	\$470-495
	2018	\$425
	2020	\$325
	Paralegals	\$395
<i>Gibson Dunn & Crutcher LLP</i>		
2020 Rates	Level	Rates
	Senior Partners	\$1,395 – 1,525
	Senior Associates	\$960
	Mid-level Associate	\$740
	Paralegals	\$480
2019 Rates	Level	Rates
	Senior Partners	\$1,335 – 1,450
	Senior Associates	\$915
	Mid-level Associate	\$625
2017 Rates	Bar Admittance or Law School Graduation	Rates
	1987	\$956
	1987	\$944
	1997	\$960
	2006	\$736
	2008	\$592/\$696
	2013	\$600
	2015	\$520
	2016	\$472
Non-Attorney		\$216-\$335
2016 Rates	Bar Admittance	Rates
	1987	\$852
	2010	\$540
	2013	\$404

2015 Rates	Years of Experience	Rates
	37	\$1,125
	23	\$955
	3	\$575
<i>Haddad & Sherwin, LLP</i>		
2021 Rates:	Years of Experience	Rates
	30	\$875
	26	\$875
2020 Rates:	Years of Experience	Rates
	29	\$850
	25	\$850
2019 Rates:		
	28	\$825
	24	\$825
2018 Rates		
	27	\$800
	23	\$800
	9	\$475
	6	\$425
<i>Hagens Berman Sobol Shapiro LLP</i>		
2017 Rates	Levels	Rates
	Senior Attorney	\$950
	Other Partners	\$578-\$760
	Associates	\$295-\$630
<i>Hooper, Lundy & Bookman</i>		
2019 Rates	Law School Graduation Year	Rates
	1975	\$1,025
	1976	\$965
	1979	\$1,025
	2007	\$815
	2011	\$800

	2015	\$640
	2016	\$600
	2019	\$440
2018 Rates	Law School Graduation Year	Rates
	1975	\$1,025
	1976	\$930
	1979	\$995
	2015	\$570
<i>Jones Day</i>		
2016 Rates	Bar Admission Year	Rates
	2001	\$900
	2014	\$450
2015 Rates	Bar Admission Year	Rates
	2001	\$875
	2014	\$400
<i>Kaplan Fox & Kilsheimer</i>		
2020 Rates	Years of Experience	Rate
	34	\$990
		\$975
	30	\$910
	26	\$895
	21	\$830
	23	\$800
	14 (Of Counsel)	\$735
	13 (Assoc.)	\$660
		\$615
	5	\$450
	3	\$395
	Staff/Project Attorney	\$350-425
	Investigator	\$325

	Paralegals	\$100-290
<i>Keker & Van Nest, LLP</i>		
2019 Rates	Years of Experience	Rates
	39	\$1,075
	9	\$700
2018 Rates	Years of Experience	Rates
	16	\$875
	5	\$600
	3	\$500
2017 Rates	Years of Experience	Rates
	9	\$650
	5	\$525
	Other Partners	\$525-\$975
	Associates	\$340-\$500
	Paralegals/Support Staff	\$120-\$260
<i>Keller Rohrback</i>		
2020 Rates	Years of Experience	Rate
	38	\$995
	33	\$975
	31	\$885
	25	\$755
	10	\$625
	Project Atty (1 yr)	\$300
	Paralegals	\$230-350

<i>Kirkland & Ellis</i>		
2021 Rates	Level	Rates
	Partners	\$1,085-\$1,895
	Of Counsel	\$625-1,895
	Associates	\$625-\$1,195
	Paraprofessional	\$255-475
2017 Rates	Years of Experience	Rates
	20	\$1,165
	9	\$995
	8	\$965
	5	\$845
	4	\$845
	3	\$810
	2	\$555
<i>Latham & Watkins</i>		
2016 Rates	Average	Rates
	Average Partner	\$1,186
	Highest Partner	\$1,595
	Lowest Partner	\$915
	Average Associate	\$755
	Highest Associate	\$1,205
	Lowest Associate	\$395
<i>Lieff Cabraser Heimann & Bernstein, LLP</i>		
2020 Rates	Law School Grad. Year	Rates
	1972	\$1,075
	1998	\$950
	1993	\$900
	1984	\$850
	2000	\$775
	2001-2002	\$700
	2005	\$650

	2007	\$590
	2008	\$560
	2012	\$480-\$510
	2015	\$440
	2017	\$395
	Law Clerk	\$375-\$395
	Paralegal/Clerk	\$345-390
	Litigation Support/Research	\$345-495
2017 Rates	Years of Experience	Rates
	11-16	\$510-\$675
	2-6	\$370-\$455
	0-13 (Contract Atty)	\$415
	Paralegals	\$360
2015 Rates	Year of Bar Admission	Rates
	1972	\$975
	1989	\$850
	2001	\$625
	2006	\$435
	2009	\$435
2014 Rates	Year of Bar Admission	Rates
	1998	\$825
<i>McCracken, Stemerman & Holsberry</i>		
2020 Rates	Law School Grad. Year	Rates
	1975	\$850
	2008	\$750
	2014	\$575
	2018-2019	\$400
<i>Milbank, Tweed, Handley & McCloy LLP</i>		
2016 Rates	Bar Admission Date	Rates
	1983	\$1,025

	1984	\$1,350
	1992	\$1,350
	2002 (Associate)	\$915
<i>Morrison Foerster LLP</i>		
2021 Rates	Law School Grad. Year	Rate
	2002	\$1,200
	2011	\$1,075
	2014	\$925
	2018	\$745
	Paralegal	\$295
2020 Rates	Law School Grad. Year	Rate
	2002	\$1,125
	2011	\$975
	2014	\$810
	2018	\$640
	Paralegal	\$275
2018 Rates	Years of Experience	Rates
	40	\$1,050
	22	\$950
	11	\$875
	3	\$550
	Paralegal	\$325
2017 Rates	Bar Admission Date	Rates
	2007	\$608
	2012	\$575
2016 Rates	Bar Admission Date	Rates
	1975	\$1,025
	1999	\$975
	1993	\$975

<i>Munger, Tolles & Olson</i>		
2021 Rates	Law School Grad. Year	Rate
	1991	\$1,725
	2009	\$995
	2016	\$825
	Paralegal (43 years)	\$365
2020 Rates	Law School Grad. Yr.	Rate
	1991	\$1,610
	2001	\$950
	2009	\$920
	2016	\$725
	Paralegal (42 years)	\$345
2016 Rates (unless otherwise noted)	Bar Admittance or Law School Graduation	Rates
	1966 (Partner)	\$1,000 (2015); \$1,245 (2016)
	1977	\$1,110 (2015)
	1981	\$910
	1985	\$995
	1992	\$875-\$885
	1995	\$910
	2002	\$750
	1976 (Of Counsel)	\$705
	2009 (Associates)	\$615 (2015); \$660 (2016)
	Non-Attorney Timekeepers	\$380-90
<i>O'Melveny & Myers</i>		
2019 Rates	Level	Rates
	Senior Partner	\$1,250
	Partner (1998 Bar Admitted)	\$1,050
	3rd Year Associate	\$640
	2nd Year Associate	\$656

2016 Rates	Bar Admission Date	Rates
	1985	\$1,175
	2004	\$895
	2005	\$780
	2007	\$775
	2010	\$725
	2011	\$700
	2012	\$655
	2013	\$585
	2014	\$515
	2015	\$435
<i>Paul Hastings LLP</i>		
2020 Rates	Years of Experience	Rates
	25	\$1,425
	7	\$885
	5	\$775
	3	\$645
	Research assistant	\$335
2016 Rates	Bar Admission Date	Rates
	1973	\$1,175
	1997	\$895
	1990	\$750
<i>Pearson Simon & Warshaw LLP</i>		
2019 Rates	Years of Experience	Rates
	23-38	\$1,150
	10	\$900
	Of Counsel	\$825
	6	\$500
	4	\$450
	Paralegals	\$225

2018 Rates	Years of Experience	Rates
	22-37	\$1,050
	9	\$650
	Of Counsel	\$725
	5	\$450
	3	\$400
2017 Rates	Years of Experience	Rates
	35-36	\$1,035
	8	\$520
	4	\$400
	2	\$350
<i>Pillsbury & Coleman</i>		
2020 Rates	Law School Grad. Year	Rates
	1979	\$960
	1976	\$675
	1990	\$550
	2010	\$475
	Paralegal	\$225
<i>Quinn Emanuel Urquhart & Sullivan</i>		
2020 Rates	Level	Rate
	Partners	\$870-\$1,250
	Associates	\$600-\$905
2018 Rates	Law School Graduation Yr.	Rates
	1980	\$1,135
	2016	\$630
<i>Reed Smith LLP</i>		
2020 Rates	Years of Experience	Rates
	22	\$930
	14	\$840

	16	\$780
	Paralegals	\$250
<i>Ropes & Gray</i>		
2016 Rates	Level	Rates
	Partner	\$880-\$1,450
	Counsel	\$605-\$1,425
	Associate	\$460-\$1050
	Paralegals	\$160-\$415
<i>Rosen, Bien, Galvan & Grunfeld LLP</i>		
2021 Rates (partial)	Law School Class	Rates
<i>Partner</i>	1984	\$925
<i>Senior Counsel</i>	2008	\$675
	2010	\$600
Associate	2016	\$465
Summer Associate	NA	\$300
Senior Paralegal		\$375
Paralegal		\$275
2020 Rates	Law School Class	Rate
<i>Partners</i>		
	1962	\$1,100
	1980	\$1,100
	1981	\$950
	1984	\$875
	1997	\$825
	2005	\$730
	2008	\$660
<i>Of Counsel</i>		
	1993	\$740
	2003	\$715

<i>Senior Counsel</i>		
	2008	\$635
	2009	\$625
	2010	\$565
<i>Associates</i>		
	2011	\$540
	2013	\$480
	2015	\$460
	2016	\$440
	2017	\$395
<i>Sr. Paralegals</i>		\$320-\$350
<i>Paralegals</i>		\$250-\$275
<i>Litigation Support/Paralegal Clerks</i>		\$225
<i>Law Students</i>		\$275
<i>Word Processing</i>		\$85
2019 Rates	Class	Rates
<i>Partners</i>		
	1962	\$1,050
	1980	\$1,000
	1981	\$940
	1984	\$860
	1997	\$800
	2005	\$700
	2008	\$640
<i>Of Counsel</i>		
	1993	\$725
	2003	\$700
<i>Senior Counsel</i>		
	2008	\$610
	2009	\$585

<i>Associates</i>		
	2010	\$540
	2011	\$525
	2013	\$460
	2015	\$440
	2016	\$400
	2017	\$350
<i>Senior Paralegals</i>		\$350
<i>Litigation Support/Paralegal Clerks</i>		\$225
<i>Law Students</i>		\$275
<i>Word Processing</i>		\$85
2018 Rates	Class	Rates
<i>Partners</i>		
	1962	\$1,000
	1980	\$965
	1981	\$920
	1984	\$835
	1997	\$780
	2005	\$650
<i>Of Counsel</i>		
	1983	\$800
	1993	\$700
	2003	\$675
<i>Senior Counsel</i>		
	2008	\$585
<i>Associates</i>		
	2009	\$535
	2010	\$525
	2011	\$500
	2013	\$440

	2015	\$410
	2016	\$375
<i>Paralegals</i>		\$340-\$240
<i>Litigation Support/Paralegal Clerks</i>		\$225
<i>Law Students</i>		\$275
<i>Word Processing</i>		\$85
2017 Rates	Class/Level	Rates
<i>Partners</i>		
	1962	\$1,000
	1980	\$950
	1981	\$900
	1984	\$825
	1997	\$780
	2005	\$650
<i>Of Counsel</i>		
	1983	\$800
	1993	\$700
	2003	\$675
<i>Associates</i>		
	2008	\$575
	2009	\$515
	2010	\$500
	2011	\$490
	2013	\$425
	2015	\$400
	2016	\$375
<i>Paralegals</i>		\$325-\$240
<i>Litigation Support/Paralegal Clerks</i>		\$225
<i>Law Students</i>		\$275

<i>Word Processing</i>		\$85
2016 Rates	Class/Level	Rates
	1962	\$995
	1980	\$900
	1985	\$800
	1997	\$740
	2008	\$545
	2009	\$490
<i>Certified Law Student</i>		\$275
<i>Paralegal</i>		\$275
2015 Rates	Years of Experience/Level	Rates
<i>Partners</i>		
	53	\$930
	35	\$840
	33	\$775
	31	\$710
	18	\$690
	9	\$525
<i>Of Counsel</i>		\$590-\$610
<i>Associates</i>		
	9	\$490
	8	\$480
	7	\$470
	6	\$440
	5	\$420
	4	\$400
	3	\$380
<i>Paralegals</i>		\$250-\$295
<i>Litigation Support/Paralegal Clerks</i>		\$200-\$220

<i>Law Students</i>		\$275
<i>Word Processing</i>		\$85

<i>Schneider Wallace Cottrell Konecky LLP</i>		
2021 Rates	Law School Grad. Date	Rate
	1993	\$1,005
	1977	\$925
	1997	\$840
	2015	\$690
2019 Rates		
	1993	\$925
	1977	\$875
	1997	\$840
	2015	\$680
	2014	\$625-680
	2007	\$625
	2017	\$575
	2009	\$725
	Paralegal	\$300
<i>Law Office of James M. Sitkin</i>		
2020 Rate	Years of Experience	Rate
	37	\$1,000
<i>Law Office of James Sturdevant</i>		
2020 Rate	Years of Experience	Rate
	47	\$975
2019 Rate		
	46	\$950

<i>Villegas/Carrera</i>		
2019 Rates:	Years of Experience	Rate
	26	\$894
	23	\$826
	3	\$350
<i>Winston & Strawn</i>		
2019 Rates	Title	Rates
	Partners	\$1,515
		\$1,245
		\$1,105
		\$1,025
	Associates	\$825
		\$660
		\$615
2018 Rates	Title	Rates
	Partners	\$1,445
		\$1,185
		\$1,050
		\$820
	Associates	\$765
		\$585
	Paralegals	\$170-\$340
	Litigation Support Mgr.	\$275
	Review Attorneys	\$85
2017 Rates	Title	Rates
	Partners	\$1,365
		\$1,120
		\$990
	Associates	\$760
		\$690
		\$645

		\$520
		\$495
	Paralegals	\$165-\$295
2016 Rates	Title	Rates
	Partners	\$1,290
		\$1,095
		\$965
		\$960
		\$885
	Associates	\$715
		\$615
		\$575
		\$470
	Paralegals	\$170-\$280
	Litigation Support Mgr.	\$250

EXHIBIT C



*2020 Real
Rate Report*[®]
Mid-Year Update

The Industry's
Leading Analysis
of Law Firm Rates,
Trends, and Practices



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Table of Contents - 2020 Real Rate Report

A Letter to Our Readers • 4

Report Use Considerations • 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 • 41

- 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
- Technology and Telecommunications

Section III: Practice Area Analysis • 56

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

Section IV: In-Depth Analysis for Select US Cities • 107

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

Section V: International Analysis • 125

Section VI: Matter Staffing Analysis • 152

Appendix: Data Methodology • 157

A Letter to Our Readers

Welcome to the Wolters Kluwer's ELM Solutions Real Rate Report®, the industry's leading data-driven benchmark report for lawyer rates.

Welcome to the Wolters Kluwer's ELM Solutions 2020 Mid-Year Real Rate Report®, the industry's leading data-driven benchmark report for lawyer rates. Our Real Rate Report has been a useful data analytics resource to the legal industry since its inception in 2010 and continues to evolve even in the current environment.

The Real Rate Report is powered by Wolters Kluwer's ELM Solutions LegalVIEW® data warehouse, the world's largest source of legal performance benchmark data, which has grown to include over \$140 billion in anonymized legal data.

As with past Real Rate Reports, all of the data analyzed are 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 to give legal departments and law firms greater ability to pinpoint areas of opportunity.

So far, 2020 has been an unprecedented year with the global pandemic causing disruption to health, economies, and society. Many industry sectors have been impacted by COVID-19, and the legal industry is no exception. Our business intelligence experts have observed downward but uneven trends in law firm billing activity and intend to continue to track the legal industry response. We strive to make the Real Rate Report a valuable and actionable reference tool for legal departments and law firms.

In our current environment, the need for a reliable and comparative data source for rates has never been more important. As always, we welcome your comments and suggestions on what information would make this publication more valuable to you. We thank you for making Wolters Kluwer's ELM Solutions your trusted partner for legal industry domain expertise, data, and analytics and look forward to continuing to provide market-leading, expert solutions that deliver the best business outcomes for collaboration among legal departments and law firms.

Sincerely,



Jonah Paransky

Executive Vice President and General Manager
Wolters Kluwer's ELM Solutions

Report Use Considerations

2020 Mid-Year Real Rate Report

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

All the analyses included in the report derive 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.

Clients 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.

Some key factors¹ that drive rates²:

- **Geographic location** - Lawyers in urban and major metropolitan areas tend to charge more when compared with lawyers in rural areas or small towns.
- **Degree of difficulty** - The cost of representation will be higher if the case is particularly complex or time-consuming; for example, if there are a large number of documents to review, many witnesses to depose, and numerous procedural steps, the case is likely to cost more (regardless of other factors like the lawyer's level of experience).
- **Experience and reputation** - A more experienced, higher-profile lawyer is often going to charge more, but absorbing this higher cost at the outset may make more sense than hiring a less expensive lawyer who will likely take time and billable hours to come up to speed on unfamiliar legal and procedural issues.
- **Overhead** - The costs associated with the firm's support network (paralegals, clerks, and assistants), document preparation, consultants, research, and other expenses.

Additional analysis was performed to examine the impact of rates on law firm invoices relative to an e-billing providers' business model. It should be noted that there are several industry-standard business models that e-billing providers use to charge law firms and other legal service providers to submit invoices and perform other transactions through their systems. The three main model types are:

- Client pay, where the corporate client pays a subscription for the matter and spend solution.
- Law firm pay, where the law firm pays a subscription or usage fee based on the invoices submitted.
- Hybrid, which is a combination of a client pay and law firm pay.

¹ Source: 2018 RRR. Factor order validated in multiple analyses since 2010

² David Goguen, J.D., University of San Francisco School of Law (2017) Guide to Legal Services Billing Retrieved from <https://www.lawyers.com/legal-info/research/guide-to-legal-services-billing-rates.html>

Report Use Considerations

The data shows that the law firm pay model has become normative in the industry – 85%+ of Wolters Kluwer's ELM Solutions clients' law firms participate in a law firm pay or hybrid model. In addition, 99% of the Am Law 200 law firms participate in at least one law firm pay model paying 1% or more on the invoices submitted, and 97% of the Am Law 200 pay 2%.

The analysis performed then examined law firm rates from firms who participated in one of those law firm pay/hybrid models versus those who are in a client pay model. The analysis showed no statistical difference in rates, suggesting that the business model that the firm participates in does not impact the rates the firm charges to their corporate client.

Effects of COVID-19

Additional analyses were performed to assess any trends and potential effects of COVID-19 on rates and other measures. Across all industries, we see a decline of 7% in the number of new matters being opened. Legal spend is down 5%. Activity varies by industry with spend decreasing only 1% in the technology sector but up to 30% for consumer services.

In some instances, we see more than expected increases in attorney rates. Among the possible reasons for this are:

- Potential opportunistic billing created by the pandemic. Dislocations in the supply chain in some segments of the market which allow firms to charge more for services.
- Law firms may have reduced staff to cut expenses. The data in the mid-year report shows a slight increase in the number of billing partners and a decrease in billing paralegals. Be on guard for opportunistic pricing and weigh your outside counsel relationships accordingly.

Overall, the data in the 2020 Mid-Year Real Rate Report provides corporate counsel with an understanding of the rates they can expect to pay for a given matter type, division, industry, or practice area and offers in-depth analyses on key drivers of rates to help make informed selection decisions. For law firms, it provides a relative benchmark to ensure that pricing for legal services remains competitive.

Wolters Kluwer's ELM Solutions research shows: you can evaluate these rates with confidence they are not affected by e-billing pricing models; you should stay sensitized to potential Covid influences on rates and activity in some markets and guard against overpaying.

ELM Solutions

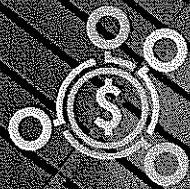
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For ideas based on insight, trust LegalVIEW – the world's largest source of legal performance benchmark data, which has grown to include over \$140 billion in anonymized legal data.

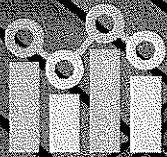
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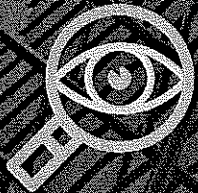
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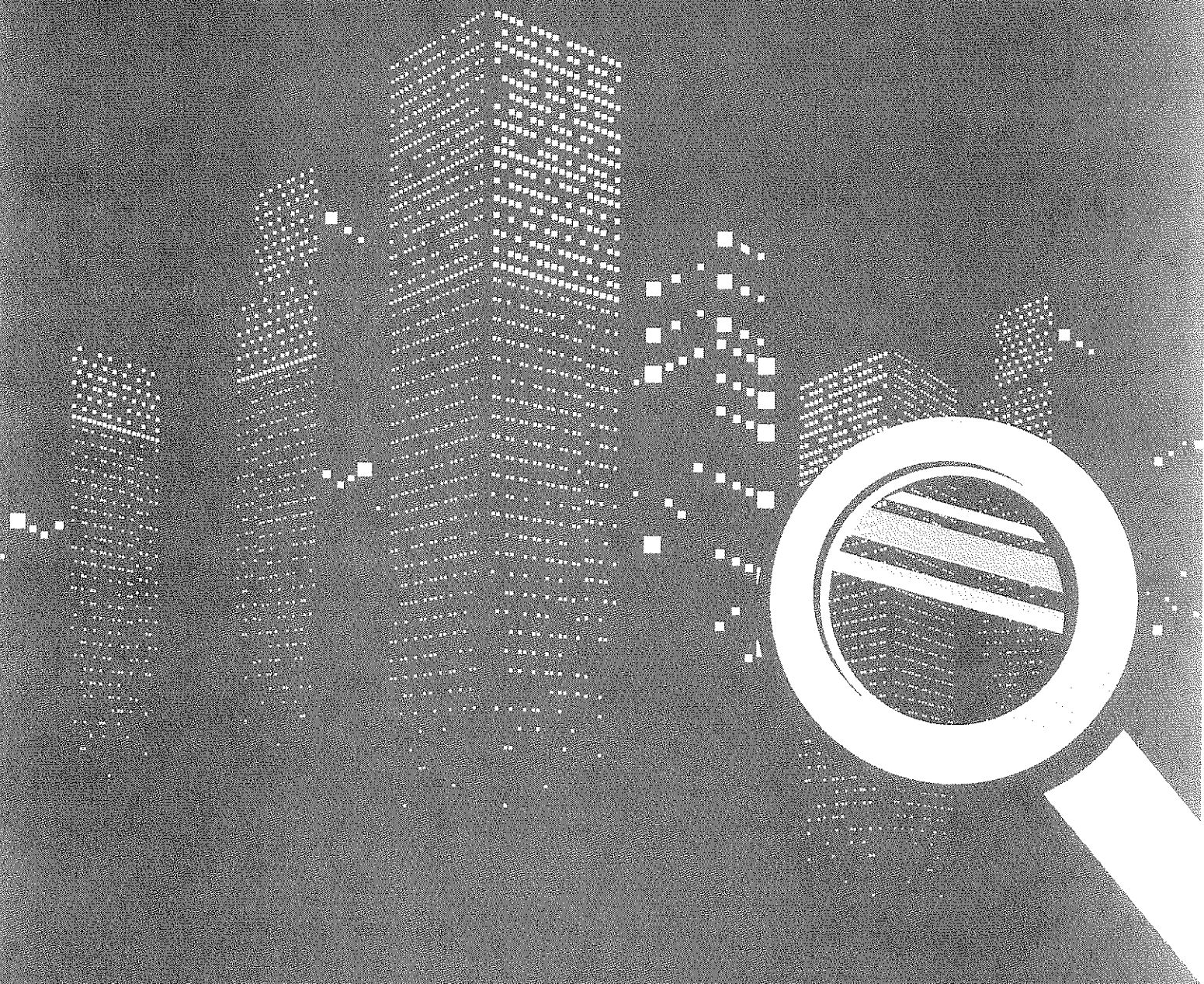
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When you have to be right

Section I: High-Level Data Cuts



2020 Mid-Year Real Rate Report

Section I: High-Level Data Cuts

Cities

By Matter Type

Q2 2020 -- Real Rates for Partners and Associates

Trend Analysis (Mean)

City	Matter Type	Role	n	First Quartile	Median	Third Quartile	Q2 2020	Q2 2019	Q2 2018
New York, NY	Litigation	Partner	13	\$250	\$340	\$395	\$344	\$353	\$365
	Non-Litigation	Associate	12	\$216	\$270	\$360	\$287	\$265	\$290
Chicago, IL	Litigation	Partner	19	\$289	\$410	\$447	\$390	\$334	\$376
		Associate	11	\$195	\$236	\$247	\$226	\$186	\$225
	Non-Litigation	Partner	35	\$284	\$370	\$419	\$376	\$383	\$383
		Associate	20	\$200	\$220	\$240	\$224	\$222	\$218
San Diego, CA	Litigation	Partner	67	\$200	\$370	\$510	\$457	\$490	\$493
		Associate	56	\$150	\$225	\$306	\$265	\$272	\$304
	Non-Litigation	Partner	101	\$325	\$500	\$986	\$643	\$649	\$598
		Associate	60	\$220	\$325	\$441	\$351	\$347	\$340
[SF] San Francisco, CA	Litigation	Partner	193	\$374	\$650	\$950	\$679	\$667	\$651
		Associate	121	\$296	\$375	\$567	\$445	\$437	\$441
	Non-Litigation	Partner	282	\$475	\$675	\$940	\$713	\$731	\$735
		Associate	220	\$333	\$421	\$650	\$497	\$468	\$474
	Non-Litigation	Partner	46	\$600	\$823	\$982	\$823	\$768	\$741
Associate		32	\$350	\$430	\$645	\$487	\$466	\$489	
San Francisco, CA	Non-Litigation	Partner	90	\$621	\$845	\$1,075	\$874	\$815	\$815
		Associate	69	\$361	\$500	\$736	\$560	\$549	\$529
San Diego, CA	Litigation	Partner	11	\$205	\$215	\$248	\$226	\$218	\$209
Seattle, WA	Litigation	Partner	91	\$400	\$468	\$594	\$511	\$494	\$522
		Associate	76	\$300	\$400	\$478	\$404	\$411	\$388
	Non-Litigation	Partner	185	\$400	\$524	\$662	\$545	\$526	\$550
		Associate	124	\$293	\$352	\$464	\$378	\$390	\$390
Boston, MA	Litigation	Partner	62	\$250	\$357	\$489	\$393	\$393	\$330
		Associate	30	\$194	\$225	\$250	\$233	\$223	\$213
	Non-Litigation	Partner	88	\$348	\$432	\$557	\$467	\$401	\$386
		Associate	17	\$260	\$276	\$317	\$278	\$253	\$239
San Diego, CA	Non-Litigation	Partner	14	\$385	\$500	\$687	\$509	\$420	\$384

Section I: High-Level Data Cuts

Cities

By Years of Experience

Q2 2020 -- Real Rates for Partners

Trend Analysis (Mean)

City	Years of Experience	n	First Quartile	Median	Third Quartile	Q2 2020	Q2 2019	Q2 2018
Oklahoma City OK	21 or More Years	18	\$220	\$335	\$365	\$309	\$362	\$300
Omaha NE	Lower Than 21 Years	15	\$293	\$336	\$370	\$337	\$302	\$295
	21 or More Years	25	\$319	\$393	\$400	\$363	\$384	\$362
Orlando FL	Lower Than 21 Years	23	\$363	\$400	\$475	\$437	\$417	\$422
	21 or More Years	39	\$377	\$450	\$475	\$437	\$455	\$445
Philadelphia PA	Lower Than 21 Years	202	\$444	\$549	\$675	\$570	\$553	\$537
	21 or More Years	382	\$500	\$680	\$850	\$693	\$658	\$629
Phoenix AZ	Lower Than 21 Years	27	\$300	\$393	\$459	\$386	\$333	\$314
	21 or More Years	52	\$325	\$375	\$570	\$449	\$431	\$408
Pittsburgh PA	Lower Than 21 Years	47	\$329	\$465	\$613	\$482	\$451	\$413
	21 or More Years	85	\$420	\$531	\$655	\$557	\$537	\$492
Portland OR	21 or More Years	26	\$205	\$361	\$436	\$342	\$363	\$349
Portland ME	Lower Than 21 Years	40	\$313	\$375	\$527	\$427	\$403	\$411
	21 or More Years	54	\$391	\$487	\$594	\$495	\$454	\$465
Raleigh NC	Lower than 21 Years	23	\$300	\$398	\$468	\$422	\$364	\$345
	21 or More Years	26	\$374	\$458	\$538	\$453	\$459	\$420
Richmond VA	Lower Than 21 Years	30	\$579	\$638	\$727	\$614	\$560	\$521
	21 or More Years	42	\$517	\$665	\$749	\$623	\$612	\$589
Richmond NY	21 or More Years	13	\$258	\$320	\$375	\$339	\$355	\$348
San Diego CA	Lower than 21 Years	19	\$280	\$401	\$433	\$389	\$372	\$375
	21 or More Years	23	\$315	\$384	\$434	\$376	\$364	\$393
San Diego CA	Lower Than 21 Years	34	\$350	\$431	\$948	\$594	\$528	\$495
	21 or More Years	81	\$315	\$430	\$986	\$630	\$641	\$630
San Francisco CA	Lower Than 21 Years	112	\$455	\$675	\$925	\$693	\$705	\$653
	21 or More Years	202	\$518	\$720	\$989	\$752	\$733	\$725
San Jose CA	Lower Than 21 Years	30	\$546	\$673	\$975	\$780	\$750	\$722
	21 or More Years	77	\$650	\$890	\$1,081	\$915	\$872	\$888
Seattle WA	Lower Than 21 Years	64	\$375	\$437	\$521	\$451	\$448	\$465
	21 or More Years	122	\$464	\$576	\$660	\$576	\$546	\$573
St Louis MO	Lower than 21 Years	52	\$340	\$408	\$491	\$412	\$369	\$318
	21 or More Years	75	\$325	\$440	\$586	\$469	\$421	\$386
Tampa FL	21 or More Years	11	\$450	\$501	\$687	\$563	\$466	\$432
Tampa FL	Lower Than 21 Years	28	\$310	\$372	\$483	\$391	\$364	\$348
	21 or More Years	46	\$375	\$486	\$540	\$500	\$451	\$422

[9F

Section I: High-Level Data Cuts

Cities

By Years of Experience

Q2 2020 -- Real Rates for Associates

Trend Analysis (Mean)

City	Years of Experience	n	First Quartile	Median	Third Quartile	Q2 2020	Q2 2019	Q2 2018
San Francisco, CA	fewer than 3 years	14	\$325	\$360	\$438	\$385	\$330	
	3 to fewer than 7 years	44	\$309	\$440	\$598	\$469	\$419	\$407
	7 or more years	74	\$329	\$431	\$646	\$487	\$481	\$500
San Jose, CA	3 to fewer than 7 years	28	\$410	\$500	\$743	\$603	\$571	\$544
Seattle, WA	fewer than 3 years	14	\$263	\$295	\$322	\$295	\$280	\$305
	3 to fewer than 7 years	30	\$277	\$310	\$336	\$305	\$314	\$289
	7 or more years	36	\$358	\$431	\$472	\$415	\$417	\$401
St. Louis, MO	3 or more years	16	\$198	\$250	\$304	\$258	\$250	\$234
Tampa, FL	3 or fewer than 7 years	11	\$240	\$275	\$330	\$287	\$286	\$261
Washington, DC	fewer than 3 years	81	\$380	\$459	\$553	\$472	\$439	\$384
	3 or fewer than 7 years	239	\$415	\$525	\$640	\$534	\$483	\$452
	7 or more years	304	\$468	\$590	\$730	\$623	\$599	\$585

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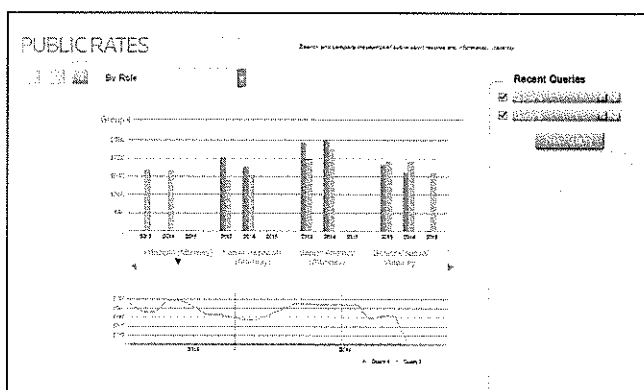
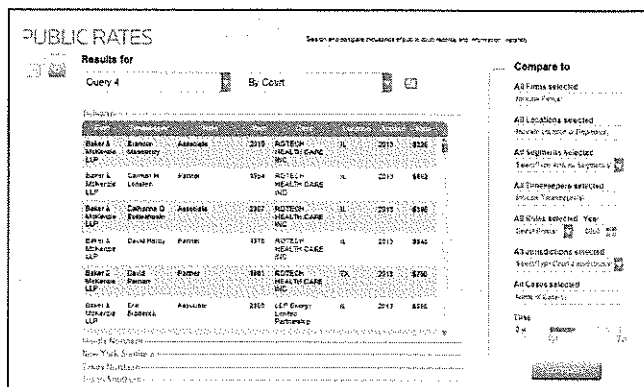
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- Segment
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- Jurisdiction
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California Rates (January–May 2018)
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Title	Professional	Firm	Graduated	Admitted	State	Rate	Hours	Total
Partner	David M. Nemecek	Kirkland & Ellis LLP	2003	2003	CA	\$1,395	2.4	\$3,348.00
Partner	Leslie A. Plaskon	Paul Hastings LLP	1988	1988	CA	\$1,275	260	\$331,500.00
Partner	Thomas B. Walper	Munger Tolles & Olson LLC	1980	1980	CA	\$1,225	166.7	\$204,207.50
Partner	Jeffrey B Greenberg	Latham & Watkins LLP	1996	1996	CA	\$1,175	3.3	\$3,877.50
Partner	Mark E. McKane	Kirkland & Ellis LLP	1997	1997	CA	\$1,175	79.1	\$92,942.50
Partner	Paul D Tanaka	Kirkland & Ellis LLP	2003	2003	CA	\$1,145	1.1	\$1,259.50
Partner	Annie Kim	Proskauer Rose LLP	2004	2004	CA	\$1,125	22.1	\$24,862.50
Partner	Jonathan Benloulou	Proskauer Rose LLP	2006	2006	CA	\$1,125	2.9	\$3,262.50
Partner	Robert J Frances	Latham & Watkins LLP	2001	2001	CA	\$1,125	1.7	\$1,912.50
Partner	Dean A. Ziehl	Pachulski Stang Ziehl Young Jones &	1978	1978	CA	\$1,050	73.3	\$76,965.00
Partner	James I. Stang	Pachulski Stang Ziehl Young Jones &	1980	1980	CA	\$1,050	111.4	\$116,970.00
Partner	Alan J. Kornfeld	Pachulski Stang Ziehl Young Jones &	1987	1987	CA	\$1,025	78.9	\$80,872.50
Partner	Stephen D. Rose	Munger Tolles & Olson LLC	1991	1991	CA	\$1,025	63.9	\$65,497.50
Partner	Unger Sean	Paul Hastings LLP	2004	2004	CA	\$1,025	103.2	\$105,780.00
Partner	Stefanie I Gitler	Kirkland & Ellis LLP	2009	2009	CA	\$995	225.1	\$223,974.50
Partner	Tate Eric A.	Morrison & Foerster LLP	1995	1995	CA	\$990	0.3	\$297.00
Partner	Michael Esser	Kirkland & Ellis LLP	2009	2009	CA	\$965	542.6	\$523,609.00
Associate	Campbell Gavin	Kirkland & Ellis LLP	2012	2012	CA	\$950	227.7	\$216,315.00
Partner	David M. Bertenthal	Pachulski Stang Ziehl Young Jones &	1993	1989	CA	\$950	107.7	\$102,315.00
Associate	Olsen Katrina	Kirkland & Ellis LLP	2014	2014	CA	\$950	4.6	\$4,370.00
Partner	Janie F. Schulman	Morrison & Foerster LLP	1987	1987	CA	\$925	0.2	\$185.00
Associate	Jacob Johnston	Kirkland & Ellis LLP	2013	2013	CA	\$905	5	\$4,525.00
Partner	Kenneth H. Brown	Pachulski Stang Ziehl Young Jones &	1981	1977	CA	\$895	5.9	\$5,280.50
Partner	Kevin S. Allred	Munger Tolles & Olson LLC	1986	1986	CA	\$875	209.7	\$183,487.50
Partner	Knudsen Erik G.	Morrison & Foerster LLP	2007	2007	CA	\$875	269.4	\$235,725.00
Counsel	Adam Lin	Orrick, Herrington & Sutcliffe LLP	2004	2004	CA	\$850	3	\$2,550.00
Associate	Austin Klar	Kirkland & Ellis LLP	2013	2013	CA	\$845	173	\$146,185.00
Associate	Michael Saretsky	Kirkland & Ellis LLP	2015	2015	CA	\$835	237.2	\$198,062.00
Of Counsel	Harry D. Hochman	Pachulski Stang Ziehl Young Jones &	1987	1987	CA	\$825	69.1	\$57,007.50
Of Counsel	Lloyd W. Aubry	Morrison & Foerster LLP	1975	1975	CA	\$825	1.6	\$1,320.00
Partner	Seth Goldman	Munger Tolles & Olson LLC	2002	2002	CA	\$825	260.5	\$214,912.50
Of Counsel	Victoria A. Newmark	Pachulski Stang Ziehl Young Jones &	1996	1996	CA	\$825	1.6	\$1,320.00
Of Counsel	Yana S. Johnson	Morrison & Foerster LLP	1999	1999	CA	\$825	3.2	\$2,640.00
Associate	Austin Klar	Kirkland & Ellis LLP	2013	2013	CA	\$810	23.3	\$18,873.00
Associate	Cynthia Castillo	Kirkland & Ellis LLP	2015	2015	CA	\$810	178.8	\$144,828.00
Associate	Kevin Chang	Kirkland & Ellis LLP	2014	2014	CA	\$810	8.4	\$6,804.00
Of Counsel	Nardali Ali U.	Morrison & Foerster LLP	2008	2008	CA	\$795	4.4	\$3,498.00
Associate	Ramin Montazeri	Latham & Watkins LLP	2016	2016	CA	\$795	10.9	\$8,665.50
Associate	Lee Muhyung	Proskauer Rose LLP	2015	2015	CA	\$780	37.5	\$29,250.00
Of Counsel	Jeffrey L. Kandel	Pachulski Stang Ziehl Young Jones &	1984	1984	CA	\$750	10.7	\$8,025.00
Of Counsel	Bradley R. Schneider	Munger Tolles & Olson LLC	2004	2004	CA	\$735	88.9	\$65,341.50
Associate	Curtis Kelly M	Proskauer Rose LLP	2016	2016	CA	\$730	39.6	\$28,908.00
Associate	Cynthia Castillo	Kirkland & Ellis LLP	2015	2015	CA	\$725	30.3	\$21,967.50
Associate	Joanna A Gorska	Latham & Watkins LLP	2014	2014	CA	\$725	2.4	\$1,740.00
Counsel	Elissa A. Wagner	Pachulski Stang Ziehl Young Jones &	2001	2001	CA	\$695	5	\$3,475.00
Associate	Benjamin Butterfield	Morrison & Foerster LLP	2014	2014	CA	\$660	883.2	\$582,912.00
Partner	David M. Eaton	Kilpatrick Townsend & Stockton LLP	1996	1996	CA	\$660	5.3	\$3,498.00
Associate	Ankur Sharma	Kirkland & Ellis LLP	2016	2016	CA	\$645	16.4	\$10,578.00
Associate	Maxwell Coll	Kirkland & Ellis LLP	2016	2016	CA	\$630	15	\$9,450.00
Associate	Brashears Travis C	Proskauer Rose LLP	2016	2016	CA	\$595	8.3	\$4,938.50
Associate	Sadeghi Sam	Paul Hastings LLP	2016	2016	CA	\$585	22.9	\$13,396.50
Associate	Jenny Pierce	Kirkland & Ellis LLP	2016	2016	CA	\$555	1.2	\$666.00
Associate	Meg A Webb	Kirkland & Ellis LLP	2017	2017	CA	\$555	1.4	\$777.00

Associate	Peter E. Boos	Munger Tolles & Olson LLC	2014	2014	CA	\$550	88.05	\$48,427.50
Associate	Floyd Amani Solange	Morrison & Foerster LLP	2014	2014	CA	\$540	3.9	\$2,106.00
Associate	Glock Jana	Morrison & Foerster LLP	2015	2015	CA	\$540	22.2	\$11,988.00
Associate	Kerry C. Jones	Morrison & Foerster LLP	2014	2014	CA	\$540	11.5	\$6,210.00
Associate	Roumiantseva Dina	Morrison & Foerster LLP	2014	2014	CA	\$540	5	\$2,700.00
Associate	Scheinok Brittany	Morrison & Foerster LLP	2015	2015	CA	\$485	27.2	\$13,192.00
Associate	Coleman Matthew	Ropes & Gray LLP	2014	2014	CA	\$450	2.5	\$1,125.00
Associate	Tobyn Yael Aaron	Morrison & Foerster LLP	2016	2016	CA	\$435	26.4	\$11,484.00

California Rates (June–December 2018)
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Title	Professional	Firm	Graduated	Admitted	State	Rate	Hours	Total
Partner	Kenneth Klee	Klee, Tuchin, Bogdanoff & Stern, LLP	1975	1974	CA	\$1,475	46.4	\$68,440.00
Partner	Eric Reimer	Milbank Tweed Hadley & McCloy LLP	1987	1987	CA	\$1,465	7.9	\$11,573.50
Partner	Gregory A. Bray	Milbank Tweed Hadley & McCloy LLP	1984	1984	CA	\$1,465	234.1	\$342,956.50
Partner	Madden P.C. Rick C	Kirkland & Ellis LLP	1995	1995	CA	\$1,445	31.2	\$45,084.00
Partner	David M. Nemecek	Kirkland & Ellis LLP	2003	2003	CA	\$1,395	2.4	\$3,348.00
Partner	Browning P.C. Marc D	Kirkland & Ellis LLP	1998	1998	CA	\$1,375	4.2	\$5,775.00
Partner	Isaac M Pachulski	Pachulski Stang Ziehl Young Jones &	2014	2014	CA	\$1,295	0.7	\$906.50
Partner	Walker Elizabeth W	Sidley Austin LLP	1984	1984	CA	\$1,250	3.7	\$4,625.00
Partner	David Stern	Klee, Tuchin, Bogdanoff & Stern, LLP	1975	1975	CA	\$1,245	67.4	\$83,913.00
Partner	Michael Tuchin	Klee, Tuchin, Bogdanoff & Stern, LLP	1990	1990	CA	\$1,245	191.1	\$237,919.50
Partner	Richard M. Pachulski	Pachulski Stang Ziehl Young Jones &	1979	1979	CA	\$1,245	274.7	\$342,001.50
Partner	Dennis Arnold	Gibson Dunn & Crutcher, LLP	1976	1975	CA	\$1,210	65.2	\$78,892.00
Partner	Cromwell Montgomery	Gibson Dunn & Crutcher, LLP	1997	1997	CA	\$1,205	0.9	\$1,084.50
Partner	Oscar Garza	Gibson Dunn & Crutcher, LLP	1990	1990	CA	\$1,205	116.1	\$139,900.50
Partner	Austin V Schwing	Gibson Dunn & Crutcher, LLP	2000	2000	CA	\$1,155	0.7	\$808.50
Partner	Douglas Michael Fuchs	Gibson Dunn & Crutcher, LLP	2007	2007	CA	\$1,155	53.5	\$61,792.50
Partner	Annie Kim	Proskauer Rose LLP	2004	2004	CA	\$1,125	11.6	\$13,050.00
Partner	Jonathan Benloulou	Proskauer Rose LLP	2006	2006	CA	\$1,125	2.9	\$3,262.50
Partner	James I. Stang	Pachulski Stang Ziehl Young Jones &	1980	1980	CA	\$1,095	63.4	\$69,423.00
Partner	Farshad E. More	Gibson Dunn & Crutcher, LLP	2003	2003	CA	\$1,080	0.8	\$864.00
Partner	Jesse I. Shapiro	Gibson Dunn & Crutcher, LLP	2000	2000	CA	\$1,080	10.9	\$11,772.00
Partner	David Fidler	Klee, Tuchin, Bogdanoff & Stern, LLP	1998	1997	CA	\$1,075	237.9	\$255,742.50
Special	Brian Stern	Milbank Tweed Hadley & McCloy LLP	2003	2003	CA	\$1,065	7.5	\$7,987.50
Special	Haig Maghakian	Milbank Tweed Hadley & McCloy LLP	2002	2002	CA	\$1,065	264.8	\$282,012.00
Partner	Jesse A. Cripps Jr.	Gibson Dunn & Crutcher, LLP	2011	2011	CA	\$1,045	16.2	\$16,929.00
Partner	Mehta Anjna	Kirkland & Ellis LLP	2000	2000	CA	\$1,045	10.9	\$11,390.50
Of Counsel	Rehta J. Gruber	Pachulski Stang Ziehl Young Jones &	1982	1982	CA	\$1,025	9.1	\$9,327.50
Partner	Samuel Newman	Gibson Dunn & Crutcher, LLP	2001	2001	CA	\$1,010	326.5	\$329,765.00
Partner	Debra I. Grassgreen	Pachulski Stang Ziehl Young Jones &	1992	1992	CA	\$995	15.7	\$15,621.50
Associate	Jessica Dombroff	Milbank Tweed Hadley & McCloy LLP	2009	2009	CA	\$995	13.3	\$13,233.50
Partner	Katherine V.A Smith	Gibson Dunn & Crutcher, LLP	2015	2015	CA	\$995	0.6	\$597.00
Partner	Matthew B Dubeck	Gibson Dunn & Crutcher, LLP	2017	2017	CA	\$995	44.1	\$43,879.50
Partner	Robert J. Pfister	Klee, Tuchin, Bogdanoff & Stern, LLP	2001	2001	CA	\$995	123.3	\$122,683.50
Partner	David M. Bertenthal	Pachulski Stang Ziehl Young Jones &	1993	1989	CA	\$975	6.5	\$6,337.50
Partner	Jeffrey N. Pomerantz	Pachulski Stang Ziehl Young Jones &	1989	1989	CA	\$975	66.5	\$64,837.50
Associate	Campbell Gavin	Kirkland & Ellis LLP	2012	2012	CA	\$950	336.5	\$319,675.00
Partner	Henry C. Kevane	Pachulski Stang Ziehl Young Jones &	1986	1986	CA	\$950	4.8	\$4,560.00
Associate	Olsen Katrina	Kirkland & Ellis LLP	2014	2014	CA	\$950	4.6	\$4,370.00
Partner	Stanley E. Goldich	Pachulski Stang Ziehl Young Jones &	1980	1980	CA	\$925	7	\$6,475.00
Associate	Najeh Baharun	Milbank Tweed Hadley & McCloy LLP	2013	2013	CA	\$910	28.3	\$25,753.00
Partner	David M. Guess	Klee, Tuchin, Bogdanoff & Stern, LLP	2005	2005	CA	\$895	84.5	\$75,627.50
Partner	Maria Sountas	Klee, Tuchin, Bogdanoff & Stern, LLP	2006	2006	CA	\$895	23.2	\$20,764.00
Partner	Whitman L. Holt	Klee, Tuchin, Bogdanoff & Stern, LLP	2005	2005	CA	\$895	54.7	\$48,956.50
Associate	Allison Balick	Gibson Dunn & Crutcher, LLP	2009	2009	CA	\$875	5.4	\$4,725.00
Associate	Caldon Brendan W	Kirkland & Ellis LLP	2007	2007	CA	\$875	1.5	\$1,312.50
Associate	Daniel B. Denny	Gibson Dunn & Crutcher, LLP	2005	2005	CA	\$875	436.1	\$381,587.50
Associate	Douglas G. Levin	Gibson Dunn & Crutcher, LLP	2009	2009	CA	\$875	205.2	\$179,550.00
Associate	Genevieve G. Weiner	Gibson Dunn & Crutcher, LLP	2007	2007	CA	\$875	93.7	\$81,987.50
Partner	Maxim B. Litvak	Pachulski Stang Ziehl Young Jones &	1997	1997	CA	\$875	89.6	\$78,400.00
Associate	Melissa Leigh Barshop	Gibson Dunn & Crutcher, LLP	2006	2006	CA	\$875	5	\$4,375.00
Associate	Jonathan Schaefer	Gibson Dunn & Crutcher, LLP	2016	2016	CA	\$860	1.9	\$1,634.00
Partner	Joshua M. Fried	Pachulski Stang Ziehl Young Jones &	1995	1995	CA	\$850	74.1	\$62,985.00
Of Counsel	Guruie Julian I	Klee, Tuchin, Bogdanoff & Stern, LLP	2007	2007	CA	\$825	39.3	\$32,422.50

Associate	Ian T. Long	Gibson Dunn & Crutcher, LLP	2015	2015 CA	\$820	140	\$114,800.00
Associate	Goldberg Zachary	Milbank Tweed Hadley & McCloy LLP	2016	2016 CA	\$790	162.4	\$128,296.00
Associate	Lee Muhyung	Proskauer Rose LLP	2015	2015 CA	\$780	28.2	\$21,996.00
Partner	Jamie L. Edmonson	Venable LLP	1996	1996 CA	\$765	180.3	\$137,929.50
Associate	Tiffany X. Phan	Gibson Dunn & Crutcher, LLP	2013	2013 CA	\$760	8.7	\$6,612.00
Of Counsel	Erin Gray	Pachulski Stang Ziehl Young Jones &	1992	1991 CA	\$750	9.9	\$7,425.00
Partner	Justin D. Yi	Klee, Tuchin, Bogdanoff & Stern, LLP	2009	2009 CA	\$750	3.9	\$2,925.00
Associate	Chapple Catherine L.	Morrison & Foerster LLP	2012	2012 CA	\$725	4	\$2,900.00
Associate	Jonathan M. Weiss	Klee, Tuchin, Bogdanoff & Stern, LLP	2012	2012 CA	\$725	195.4	\$141,665.00
Of Counsel	William Ramseyer	Pachulski Stang Ziehl Young Jones &	1980	1980 CA	\$725	18.8	\$13,630.00
Associate	Sarah A. Carnes	Cooley LLP	2014	2014 CA	\$710	146.1	\$103,731.00
Associate	Latta R T	Jones Day	2011	2011 CA	\$700	194.5	\$136,150.00
Associate	Samuel M. Kidder	Klee, Tuchin, Bogdanoff & Stern, LLP	2012	2012 CA	\$675	88.6	\$59,805.00
Associate	Thomas H Alexander	Gibson Dunn & Crutcher, LLP	2015	2015 CA	\$660	23.7	\$15,642.00
Associate	Sasha M. Gurvitz	Klee, Tuchin, Bogdanoff & Stern, LLP	2014	2014 CA	\$625	114.9	\$71,812.50
Associate	Robert J. Smith	Klee, Tuchin, Bogdanoff & Stern, LLP	2016	2016 CA	\$600	35.8	\$21,480.00
Associate	Brashears Travis C	Proskauer Rose LLP	2016	2016 CA	\$595	8.3	\$4,938.50
Associate	Matthew S Coe-Odess	Gibson Dunn & Crutcher, LLP	2016	2016 CA	\$595	16.9	\$10,055.50
Associate	Katherine A Lau	Gibson Dunn & Crutcher, LLP	2017	2017 CA	\$525	97.7	\$51,292.50
Associate	Tran J L	Jones Day	2015	2015 CA	\$525	60.2	\$31,605.00
Associate	Nicholas A. Koffroth	Venable LLP	2012	2012 CA	\$515	94.9	\$48,873.50
Associate	Liu R Q	Jones Day	2015	2015 CA	\$475	34.2	\$16,245.00
Associate	Stuart B W	Jones Day	2013	2013 CA	\$475	208.6	\$99,085.00
Associate	Doyle A M	Jones Day	2017	2017 CA	\$450	6.5	\$2,925.00
Associate	Udenka Honieh	Brown Rudnick LLP	2017	2017 CA	\$375	1	\$375.00