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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA—WESTERN DIVISION

OMAR VARGAS, ROBERT BERTONE, MICHELLE HARRIS, and SHARON HEBERLING individually, and on behalf of a class of similarly situated individuals,

Plaintiffs,

v.

FORD MOTOR COMPANY,
Defendant.

Case No. CV12-08388 AB (FFMx)

The Hon. André Birotte Jr.

DECLARATION OF JORDAN L. LURIE IN SUPPORT OF PLAINTIFFS’ UNOPPOSED MOTION FOR ATTORNEYS’ FEES, COSTS, AND SERVICE AWARDS

Date: October 2, 2017
Time: 10:00 a.m.
Place: Courtroom 7B

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DECLARATION OF JORDAN L. LURIE

I, Jordan L. Lurie, declare as follows:

1. I am an attorney licensed to practice before all courts of the State of California. Unless the context indicates otherwise, I have personal knowledge of the facts stated in this declaration and, if called as a witness, I could and would testify competently thereto. I am Of Counsel at Capstone Law APC (“Capstone”), one of the counsel of record for Plaintiffs in the above-captioned action (“Lead Class Counsel”). When the work performed reflects contributions from co-counsel Berger & Montague, I will refer to that work as being performed by “Class Counsel.” I make this declaration in support of Plaintiffs’ Motion for Attorneys’ Fees, Costs, and Service Awards.

SUMMARY OF ALLEGATIONS AND PROCEDURAL HISTORY

2. On September 28, 2012, Plaintiff Omar Vargas filed the initial complaint in this putative class action in the Central District of California against Defendant Ford Motor Co., complaining of symptoms of the Transmission Defect, including lunging or jerking forward when attempting to decelerate, hesitation, and jerking when attempting to accelerate, akin to a slingshot effect. (Dkt. No. 1.) The Complaint alleged that the PowerShift Transmission, which Ford billed as a new type that combines the best features of automatic and standard transmissions, causes Class Vehicles to slip, buck, and jerk and to suffer sudden or delayed acceleration and delays in downshifts. Plaintiff Vargas alleged that he began experiencing the Transmission Defect in his 2011 Ford Fiesta soon after his lease began and made multiple visits to Ford dealers to have the Transmission repaired, to no avail.

3. The Complaint alleges that Ford knew that the Transmission was defective and presented a safety hazard but did not disclose this information to its customers. The Complaint seeks damages and injunctive relief against Ford for violating California consumer protection laws, breach of express warranty, and breach of implied warranty under the Song-Beverly Consumer Warranty Act.

1 4. The First Amended Complaint was filed on December 12, 2012, to add a
2 claim for damages. (Dkt. No. 24) The Second Amended Complaint was filed on August
3 30, 2013, to join Plaintiffs Robert Bertone, Michelle Harris, and Sharon Heberling and to
4 add a claim for violation of Florida’s consumer’s laws. (Dkt. No. 57.)

5 5. Another suit alleging similar claims, *Klipfel v. Ford Motor Co.*, No. 15-
6 CVP0044, was first filed in San Luis Obispo Superior Court on February 20, 2015. Ford
7 removed *Klipfel* to the Central District of California under the assigned case number
8 2:14-cv-02140-AB (FFMx). Ford’s motion to dismiss the *Klipfel* Plaintiffs’ claims was
9 denied as moot after Plaintiffs filed a First Amended Complaint. (*Klipfel* Dkt. No. 17.)
10 The Parties later stipulated to consolidate the *Vargas* and *Klipfel* actions. The stipulation
11 was granted on December 2, 2015. (*Vargas* Dkt. No. 34.)

12 6. Ford instituted two Customer Satisfaction Programs, called 14M01 and
13 14M02, during the pendency of the litigation. The 14M01 Program attempted to address
14 the problems Plaintiffs identified in this lawsuit by extending the warranty coverage to 7
15 years or 100,000 miles for the Transmission’s input shafts, clutch, and software
16 calibration in certain Class Vehicles manufactured through June 5, 2013. The 14M02
17 Program extended the warranty on the Transmission Control Module to 10 years e or
18 150,000 miles for certain Class Vehicles manufactured through June 30, 2015.
19 However, Plaintiffs alleged that neither program fully remedied the harm Class
20 Members experienced.

21 7. Two additional actions alleging similar claims, *Cusick v. Ford Motor*
22 *Company*, Case No. 2:15-cv-08831-AB (C.D. Cal.), filed on November 12, 2015, and
23 *Anderson v. Ford Motor Co.*, No. 1:16-cv-01632 (N.D. Ill.), filed on April 21, 2016,
24 were also brought by Ford consumers. *Cusick* was consolidated with the instant action
25 on February 22, 2017 (*Vargas* Dkt. 52), and the First Amended Complaint in *Cusick*,
26 filed on February 22, 2016, was deemed the “Operative Complaint” for settlement
27 purposes.
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1 8. Investigation and Discovery. Both before and after these actions were
2 filed, Class Counsel thoroughly investigated and litigated their claims, including
3 conducting testing regarding the Transmission Defect, which allowed Class Counsel to
4 evaluate Ford’s representations concerning the problems alleged and solutions proposed.
5 Among other tasks, Class Counsel consulted and retained automotive experts and
6 researched publicly available materials and information provided by the National
7 Highway Traffic Safety Administration (“NHTSA”) concerning consumer complaints
8 about the Transmission. Class Counsel also reviewed and researched consumer
9 complaints and discussions of Transmission problems in articles and forums online, as
10 well as various manuals and technical service bulletins discussing the alleged defect.
11 Finally, Class Counsel conducted research into the applicable causes of action and other
12 similar automotive actions.

13 9. Class Counsel also propounded discovery on Ford. In response, Ford
14 produced over 1.5 million pages of documents, including spreadsheets with millions of
15 lines of data, owners’ manuals, maintenance and warranty manuals, design documents
16 (*e.g.*, technical drawings), VIN Decoders, technical service bulletins, field reports,
17 customer comments detail reports, warranty data, internal emails, and emails between
18 Ford and third parties regarding the Transmission. Furthermore, Class Counsel
19 defended depositions of four class representatives.

20 10. In reviewing this discovery, including hundreds of thousands of pages of
21 email correspondence and databases containing millions of lines of data produced by
22 Ford, Class Counsel identified information that was instrumental to the case and to
23 Plaintiffs’ efforts during mediation.

24 11. Furthermore, Class Counsel identified topics for Fed. R. Civ. P. 30(b)(6)
25 depositions, including those of Chris Kwasniewicz, the engineer Ford assigned to
26 “problem solve” the DPS6 Transmission, and Matt Fyie, a Design Analysis Engineer for
27 Ford’s automatic transmissions. Mr. Kwasniewicz’s deposition elicited information
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1 about the DPS6's design, its dual-clutch function, the manufacturing processes of its
2 various components, the problems it exhibited and their root causes, changes to the
3 clutch material, the input shaft seals, control software, and the customer service
4 programs and warranty extensions Ford initiated during the litigation. Matt Fyie's
5 deposition elicited information about the incidences of PowerShift Transmission
6 problems and the number of replacement parts provided to the class.

7 12. Moreover, over the course of litigation, thousands of Class Members
8 contacted Class Counsel to report problems with their Class Vehicles. Class Counsel
9 logged each Class Member's complaint in a database and developed a plan for litigation
10 and settlement based in large part on their reported experiences with their Class Vehicles
11 and with Ford dealers.

12 **SETTLEMENT NEGOTIATIONS AND POST-PRELIMINARY APPROVAL SERVICES**

13 13. Negotiating the Initial Nationwide Settlement: The proposed Settlement is
14 the culmination of lengthy discussions between the Parties, consultation with their
15 experts, comprehensive discovery, and thorough analysis of the pertinent facts and law at
16 issue. To facilitate settlement, the Parties attended the first of a series of mediation
17 sessions in Boston, Massachusetts, on August 18, 2015, with one of the top mediators in
18 the field, Professor Eric D. Green of Resolutions LLC. In advance of the mediation, the
19 Parties submitted detailed mediation briefs setting forth their positions. The Parties were
20 unable to reach an agreement on all material terms of the proposed relief to the Class in
21 this initial mediation but agreed to engage in further negotiations with Prof. Green.

22 14. In a subsequent mediation session in Boston on May 6, 2016, the Parties
23 made substantial progress, and, with Prof. Green's continuing assistance, were able to
24 agree to relief for the Class on June 2, 2016. After confirming the terms for class relief,
25 on June 9, 2016, the Parties participated in another session in Boston with Prof. Green
26 solely on the issue of attorneys' fees, costs, and incentive awards, which they were
27 ultimately able to resolve. Plaintiffs and Class Counsel took care to ensure that their
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1 interests aligned with those of the Class by negotiating attorneys' fees only after the
2 benefits for the Class had been determined.

3 15. After completing the mediation, the Parties worked diligently to formalize
4 this complex, sweeping Settlement. Counsel for the Parties devoted considerable effort
5 and time to, *inter alia*, (a) refining and harmonizing the separate cash payment
6 components of the Settlement, (b) drafting the Arbitration Rules, (c) researching each
7 state's lemon laws and class action settlements involving similar automotive defects, (d)
8 creating notices that would clearly answer Class Members' questions regarding the
9 Settlement, and (e) drafting the final settlement and motion papers.

10 16. Class Counsel prepared and filed Plaintiffs' Motion for Preliminary
11 Approval of the Class Action Settlement on March 24, 2017. (Dkt. No. 120.) Following
12 the hearing, the Court granted preliminary approval on April 25, 2017. (Dkt. No. 133.)
13 Following issuance of the Order granting Preliminary Approval, on July 7, 2017, the
14 Claims Administrator sent over 2,150,307 Class Notices to Class Members. According
15 to the Claims Administrator, there are 1,468,890 Class Vehicles.

16 17. Services to Class Members. Due to the high interest in this litigation, even
17 before preliminary approval, Lead Class Counsel received dozens of inquiries from
18 Class Members a day, with a substantial number of putative Class Members submitting
19 repair orders or providing other information about their experiences with their Class
20 Vehicles. Since dissemination of the Class Notice, Lead Class Counsel have continued
21 to devote considerable time and resources to responding to Class Members' inquiries,
22 which now surpass 18,000, confirming and explaining the Settlement's benefits. The
23 flood of Class Member inquiries following preliminary approval required multiple
24 attorneys to devote all of their time to this case.

25 18. As part of their comprehensive efforts to accommodate Class Members
26 following the dissemination of the Class Notice, Lead Class Counsel have responded to
27 hundreds of phone calls and emails a day from Class Members, created an interactive
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1 voice response system, developed a content-rich website to educate Class Members
2 about the Settlement's benefits, and worked to resolve numerous administrative issues
3 that arose during this phase. Moreover, collaborating with Ford's counsel, Class Counsel
4 contributed to the development of the Administrator's settlement website, interactive
5 voice response system, and the Arbitration Administrator's web site.

6 19. Lead Class Counsel also prepared this Motion and will be finalizing briefs
7 supporting the Motion for Final Approval of the Class Action Settlement and a
8 supplemental brief responding to objections. In addition, Lead Class Counsel will
9 continue to serve Class Members during the claims' period for cash payments and
10 arbitration, which will run for years to process both cash payments and arbitration. Lead
11 Class Counsel expects that it will expend hundreds of hours after the filing of this
12 Motion delivering services to Class Members regarding the Settlement.

13 **BENEFITS OF THE SETTLEMENT**

14 20. Cash Payments for Service Visits. The Settlement provides that Class
15 Members who have had three or more Service Visits to authorized Ford dealers to
16 replace qualifying parts ("Transmission Hardware Replacement")¹ will be entitled to
17 either a cash payment or a Discount Certificate, valued at twice the amount of the cash
18 payment, toward the purchase or lease of a new Ford vehicle. The value of each cash
19 payment or Certificate is determined by the number of Service Visits made, with \$2,325
20 cash or \$4,650 Certificate value being the maximum amount payable. The Settlement
21 does not impose a definitive cut-off date for Class Members to submit claims for which
22 they qualify. Each Class Member may qualify for new or additional benefits if an
23 applicable Service Visit for a Transmission Hardware Replacement is made within the 7
24 year/100,000 mile period, and the Class Member timely files the claim.

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26 ¹ Qualifying Transmission parts are defined as the following: (1) 7B546 Disc Asy-Clutch; (2)
27 7Z369 Control Mod Trans (TCM); (3) 7052 Oil Seal-Trans Rear; (4) 7000 Transmission Asy-Aut; (5)
28 7C604 Motor-Frt Clutch; (6) 7A508 Rod-CI/Slave Cyl Pus; (7) 6K301 Seal/RetC/Shft Oil; (8) 7060
Shaft/Bshg Asy-Out; (9) 7048 Seal-Input Shaft Oil; and/or (10) 7515 Lever Asy-Clutch Rel. These ten
parts are the most common parts replaced on the Transmission.

1 21. Cash Payments for Software Flashes. The Settlement provides that Class
2 Members are also entitled to receive \$50 for each Software Flash, starting with the third,
3 that was performed within the same 7 year/100,000 mile period. (Settlement Agreement
4 ¶ II.B.) Class Members may receive up to \$600 in payments for Software Flashes. As
5 with the Transmission Hardware Replacements, Class Members may continue to submit
6 new or additional claims for each qualifying Service Visit made within seven years of
7 the date of delivery of the Vehicle to the first retail customers, or within 100,000 miles,
8 whichever comes first. Once Class Members have qualified for a Transmission
9 Hardware Replacement payment, however, they are no longer eligible for a Software
10 Flash payment

11 22. Arbitration Program for Repurchase. Class Members are eligible to
12 participate in the Program, paid for by Ford, to seek the repurchase or replacement of
13 their Class Vehicles. This Program enhances Class Members' rights in several ways.
14 The Program resolves Class Members' lemon law claims within two months of
15 submission, rather than the year or more for a lemon law suit filed in state court. The
16 Program also extends the statute of limitations, preserving claims for six years from the
17 date of original sale or six months of the effective date of the Settlement, whichever is
18 later. Ford will pay a maximum of \$6,000 in attorneys' fees to each Class Member who
19 prevails on his or her claim.

20 23. Perhaps most importantly, claims submitted to the Arbitration Program
21 will be governed either by the state law applicable to each Class Member or by the
22 Settlement's consumer-friendly default remedy. Under the default remedy, the Arbitrator
23 may award a repurchase if four or more Transmission Hardware Replacements were
24 performed within five years or 60,000 miles of the original purchase, and the vehicle
25 continues to malfunction, even if the applicable state law does not otherwise authorize a
26 repurchase in the Class Member's circumstances. This default remedy is more generous
27 to consumers than most state's lemon laws.
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1 24. Significantly, Class Members will have the opportunity to appeal an
2 adverse Program decision to a JAMS arbitrator, though any costs for an appeal must be
3 advanced by the Class Member, to be reimbursed by Ford if the Class Member prevails.
4 Ford has no right to appeal. The Arbitrator may not award civil penalties or punitive
5 damages, which are available in some jurisdictions, and Class Members cannot appeal
6 an adverse decision to a court. Furthermore, even if a Class Member's first repurchase
7 claim is denied, he or she may pursue a second repurchase claim under the Program if
8 his or her Class Vehicle has subsequent qualifying repairs. Finally, Class Members will
9 not be denied the opportunity to re-submit to the Program a repurchase claim made prior
10 to the Settlement with the Better Business Bureau or other similar organization if the
11 original claim for a buyback was denied by the arbitrator.

12 25. Arbitration Program for Breach of New Vehicle Limited Warranty. Class
13 Members who have incurred out-of-pocket expenses for repairs they believe were
14 covered by Ford's New Vehicle Limited Warranty ("Warranty") or who believe that a
15 Ford dealer improperly denied Warranty repairs are eligible to pursue their claims in a
16 qualified version of the Arbitration Program ("Warranty Arbitration"). Ford will pay the
17 costs of each Warranty Arbitration. The Arbitrator is authorized to award
18 reimbursement, a complimentary repair, or an extension of warranty by Ford. However,
19 the Arbitrator may not award a Class Member's attorneys' fees, and claims must be
20 submitted within the statute of limitations for express warranty claims as determined by
21 law of the state in which the Class Vehicle was purchased.

22 26. Reimbursement for Clutch Replacement. The Settlement provides that
23 Class Members who own or lease a Class Vehicle manufactured after June 5, 2013, and
24 had two clutches replaced during the 5-year/60,000-mile Powertrain Warranty are
25 entitled to reimbursement for out-of-pocket costs for a third clutch replacement within 7
26 years/100,000 miles from delivery to the first retail customer. The replacement clutch
27 will also be covered by a two-year warranty.
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VALUATION OF BENEFITS

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2 27. Class Counsel have reviewed reports documenting Ford’s sales of
3 Transmission parts to Ford dealers for the purpose of warranty repairs (i.e., parts ordered
4 by Ford dealers to respond to repair demands from Ford customers). Based on this data
5 and based on calculations provided to me and set forth below, Ford is projected to
6 provide over 8 million qualifying Transmission parts to Ford dealers as of the date of this
7 Motion. Given that there are approximately 1,468,890 Class Vehicles, each Class
8 Vehicle would average five qualifying repairs based on this data. To be sure, the
9 distribution of Transmission parts is not spread evenly to all Class Vehicles, as many
10 Class Vehicles have not yet had any repairs performed. However, the projection of 8
11 million Transmission Hardware Replacements strongly suggests that a significant
12 proportion of the approximately 1.9 million Class Members will qualify for one or more
13 of the Settlement’s benefits. A Class Member with five qualifying Transmission
14 Hardware Replacements would receive \$825 under the Settlement. In fact, even if
15 only ten percent (10%) of the class had five qualifying repairs performed, which
16 based on the numbers would be an understatement, the value of the settlement would
17 be \$121,183,425 for Transmission Hardware Replacement payments alone.
18 Plaintiffs’ fees would be a very modest seven percent of just this one component of
19 the Settlement, as this calculation does not even contemplate the number of Class
20 Members who would be entitled to a full repurchase (i.e. \$20,000+) of their vehicles
21 under the default remedy for having four or more Transmission Hardware
22 Replacements performed.

23 28. As for the repurchase remedy, even if only 1% of the Class Vehicles
24 (14,689 vehicles) were eligible under the Settlement’s default remedy, the settlement
25 value would still far exceed an amount that would justify Plaintiffs’ fee request.
26 Under a very conservative assumption that these Class Members purchased their
27 vehicles for \$10,000 with a third Transmission Hardware Replacement performed at
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1 30,000 miles (for purposes of a mileage deduction under the default remedy), their
2 recovery would amount to at least \$7,500 each. If a vehicle, on average, maintains
3 37% of its value after five years, each Class Member would recover \$3,800 more
4 from the Settlement than they would from an independent sale. Thus, even if only 1%
5 of the class prevailed on this claim (an overly conservative assumption made to
6 underscore the point), the Settlement would be valued at \$55,818,200, and Plaintiffs'
7 fees would amount to 15.3% of just this one Settlement benefit alone.

8 29. Furthermore, this calculation does not include the attorneys' fees (up to
9 \$6,000 per prevailing Class Member) and the arbitrator's fees and costs (at least
10 \$3,000) that would be paid by Ford, which are also quantifiable benefits for Class
11 Members. The aggregate value of the administrative costs and attorneys' fees (if
12 awarded in full) would be \$132,201,000, if only 1% of the Class were to prevail on
13 repurchase claims through the Arbitration Program. This amount also omits the value
14 to Class Members of the cash payments for Software Flashes, reimbursement for
15 clutch replacements, or the awards made through Warranty Arbitration.

16 30. The overall benefit conferred on the Class for the repurchase awards and
17 the cash payments for Transmission Hardware Replacements (both based on
18 exceptionally conservative assumptions) exceeds \$300 million. This figure does not
19 include the costs of claims administration, cash payments for Software Flashes,
20 reimbursement for clutch replacements, and the Warranty Arbitration awards. The
21 requested amount in attorneys' fees and expenses of \$8,530,130.68 represents less than
22 4% of that value, which is substantially lower than the 25% benchmark in the Ninth
23 Circuit² and is therefore reasonable. Conversely, the 25% benchmark would be met if
24 the Settlement delivered \$34.12 million in value to the Class. To put this in perspective,
25 \$34.12 million in settlement benefits would be reached if only 41,358 of Class Members
26 had five Transmission Hardware Replacements—a figure that represents 2.8% of the

27 _____
28 ² See *Six Mexican Workers*, 904 F.2d at 1311 (announcing a 25% benchmark and authorizing district courts to make upward or downward adjustments as necessary).

1 Class and requires only 206,790 qualifying repairs. Given that there were over 8 million
2 Transmission parts sold that would qualify for Transmission Hardware Replacements,
3 the Settlement will dramatically exceed \$32.12 million in value conferred, confirming
4 the reasonableness of the fee request on a percentage cross-check.

5 HOURS EXPENDED BY CAPSTONE ATTORNEYS

6 31. Not including write-offs, Capstone has expended 12,459.5 hours,
7 amounting to \$6,363,440.00 in lodestar, prosecuting this action and securing the benefits
8 for the Class, based on lodestar information provided to me. These hours do not account
9 for additional hours that will be spent preparing further briefing (including finalizing the
10 motion for final approval and the supplemental brief in support of final approval) and
11 hundreds of hours required to help Class Members understand the Settlement and submit
12 claims for years to come. Capstone has reviewed billing entries describing tasks
13 performed that attorneys entered contemporaneously into Counsel's billing program
14 (time not included in the hours submitted). California law does not require actual billing
15 records; courts may award statutory fees based on declarations and summaries.
16 Accordingly, Capstone prepared detailed time summaries to ease the Court's burden of
17 reviewing the over 20,000 contemporaneously-entered time entries upon which the
18 summaries were based. However, Capstone will provide the complete billing records
19 upon the Court's request.

20 32. Following the review of the voluminous records, Capstone sorted the
21 entries by task categories, summarizing those tasks for the Court's convenience.³ The
22 hours incurred reflect Lead Class Counsel's exceptional efforts in surmounting a number
23 of obstacles, including strong resistance from a well-financed opponent represented by
24 highly experienced and skilled counsel, to secure an excellent Settlement for the Class:

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27 _____
28 ³ Class Counsel has also written off over 1,000 hours, representing over \$650,000
in fees in the exercise of billing discretion.

LODESTAR BY BILLER

Lawyer	Title	CA Bar	Rate	Hours	Fees
Raul Perez	Partner	1994	\$725	99.1	\$71,847.50
Jordan Lurie	Of Counsel	1987	\$725	1,398.9	\$1,014,202.50
Stephen H. Gamber	Fmr. Senior Counsel	1994	\$695	335.9	\$233,450.50
Robert Friedl	Senior Counsel	1988	\$695	212.7	\$147,826.50
Marquette Jones	Fmr. Attorney	1999	\$670	862.7	\$578,009.00
Ryan Wu	Senior Counsel	2002	\$595	533.4	\$317,373.00
Samara Weiner	Attorney	2003	\$570	834.6	\$475,722.00
Tarek Zohdy	Attorney	2006	\$495	3,026.2	\$1,497,969.00
Jamie Greene	Attorney	2007	\$470	68.4	\$32,148.00
Lucas Rogers	Fmr. Attorney	2008	\$445	1,608.2	\$715,649.00
Mao Shiokura	Attorney	2009	\$420	112.9	\$47,418.00
Karen Wallace	Attorney	2010	\$395	1,116.3	\$440,938.50
Cody Padgett	Attorney	2011	\$370	900.9	\$333,333.00
Trisha Monesi	Attorney	2015	\$245	502.8	\$123,186.00
Contract Attorneys for Settlement Outreach			\$395	846.5	\$334,367.50
Total				12,459.5	\$6,363,440.00

Lodestar by Major Phase/Task of the Litigation

Major Phases/Tasks of the Litigation	Hours	Fees
Pleadings/Stipulations/Case Management	510.4	\$267,287.00
Legal and Factual Analysis of Claims	360.7	\$182,456.50
Discovery	3,065.8	\$1,479,471.00
Class Communications/Interviews/Intakes/Q&As	5,380.0	\$2,599,134.00
Pre-Settlement Motion Practice	181.0	\$111,869.50
Strategy Meetings	113.0	\$61,544.00
Mediation/Settlement Negotiations	651.6	\$414,697.50
Arbitration Component of Settlement	141.0	\$83,369.50
Drafting Settlement Agreement / Supervise Settlement Administration	1,214.4	\$676,366.50
Post-Settlement Motion Practice	272.9	\$161,470.50
Settlement and Lemon Law Legal Research	568.7	\$325,774.00
Total	12,459.5	\$6,363,440.00

1 **CAPSTONE LAW APC’S QUALIFICATIONS, EXPERIENCE, AND HOURLY RATES**

2 33. Short biographies summarizing my experience and that of other attorneys
3 at Capstone is set forth in the firm resume attached as Exhibit 1. Also set forth in the
4 firm resume are Capstone’s accomplishments since its creation in 2012. One of the
5 largest California firms to prosecute aggregate actions on a wholly contingent basis,
6 Capstone, as lead or co-lead counsel, has obtained final approval of sixty class actions
7 valued at over \$100 million dollars. Recognized for its active class action practice and
8 cutting-edge appellate work, Capstone’s recent accomplishments have included three of
9 its attorneys being honored as *California Lawyer’s Attorneys of the Year* (“CLAY”) in
10 the employment practice area for 2014 for their work in the landmark case *Iskanian v.*
11 *CLS Transportation Los Angeles*, 59 Cal. 4th 348 (2014).

12 34. Capstone has an established practice in automotive defect class actions
13 and currently serves as certified class counsel in *Falco v. Nissan N. Am. Inc.*, No. 13-
14 00686-DDP, 2016 WL 1327474 (C.D. Cal. Apr. 5, 2016) (certifying a class of
15 owners/lessees of Nissan vehicles with alleged timing chain defect on contested motion).
16 Capstone has served as class counsel in class action settlements involving automotive
17 defects on many occasions over the past four years. *See, e.g., Batista v. Nissan N.Am.,*
18 *Inc.*, No. 14-24728-RNS (S.D. Fla. June 29, 2017), Dkt. 191 (finally approving class
19 action settlement alleging CVT defect); *Chan v. Porsche Cars N.A., Inc.*, No. No. 15-
20 02106-CCC (D. N.J. Apr. 11, 2017), Dkt. 43 (preliminarily approving class action
21 settlement involving alleged windshield glare defect); *Klee v. Nissan N. Am., Inc.*, No.
22 12-08238-AWT, 2015 WL 4538426, at *1 (C.D. Cal. July 7, 2015) (settlement
23 involving allegations that Nissan Leaf’s driving range, based on the battery capacity, was
24 lower than was represented by Nissan); *Asghari v. Volkswagen Group of America, Inc.*,
25 Case No. 13-cv-02529-MMM-VBK (C.D. Cal.) (class action settlement providing
26 repairs and reimbursement for oil consumption problem in certain Audi vehicles);
27 *Aarons v. BMW of N. Am., LLC*, No. CV 11-7667 PSG, 2014 WL 4090564 (C.D. Cal.

1 Apr. 29, 2014), objections overruled, No. CV 11-7667 PSG CWX, 2014 WL 4090512
2 (C.D. Cal. June 20, 2014) (C.D. Cal.) (class action settlement providing up to \$4,100 for
3 repairs and reimbursement of transmission defect in certain BMW vehicles).

4 35. Capstone's hourly rates for work on automotive defect cases have been
5 judicially approved by numerous federal district courts. *See, e.g., MacDonald v. Ford*
6 *Motor Co.*, No. 13-02988-JST, 2016 WL 3055643 (N.D. Cal. May 31, 2016) (approving
7 rates of \$370 to \$695 for the same attorneys working in this action in an automotive
8 defect case on a contested fee motion); *Klee.*, 2015 U.S. Dist. LEXIS 88270, *38
9 (approving rates of \$370 to \$695 for same attorneys at Capstone as here in an
10 automotive defect case); *Asghari*, 2015 WL 12732462, at *43 (same); *Aarons*, 2014 WL
11 4090564, **17-18.

12 36. Capstone's hourly rates are also consistent with the judicially-approved
13 hourly rates of comparable plaintiffs'-side attorneys, such as Baron & Budd (rates
14 ranging from \$775 for the requested partner to \$390-\$630 for non-partners), Wasserman,
15 Comden, Casselman, & Essensten (rates ranging from \$670-750 for partners and \$300-
16 500 for associates), and Blood Hurst & O'Reardon (\$510-695 for partners). *Aarons*,
17 2014 WL 4090564, **17-18 (also approving rates of Capstone); *see also, Chambers v.*
18 *Whirlpool Corp.*, 214 F.Supp.3d 877, 899 (C.D. Cal. 2016) (approving rates of \$485 to
19 \$750 for consumer class action attorneys on a contested fee motion); *Etter v. Thetford*
20 *Corporation*, No. 13-00081-JLS, 2017 WL 1433312 (C.D. Cal. Apr. 14, 2017)
21 (approving \$275 to \$775 for Southern California attorneys on a contested fee motion);
22 *Bravo v. Gale Triangle, Inc.*, No. 16-03347 BRO, 2017 WL 708766, *17 (C.D. Cal.
23 Feb. 16, 2017) (approving rates between \$350 and \$700); *Kearney v. Hyundai Motor*
24 *Am.*, 2013 U.S. Dist. LEXIS 91636, *24 (C.D. Cal. June 28, 2013) (approving hourly
25 rates of \$650-\$800 for senior attorneys in consumer class action); *Parkinson v. Hyundai*
26 *Motor America*, 796 F. Supp. 2d 1160, 1172 (C.D. Cal. 2010) (approving hourly rates
27 between \$445 and \$675); *Barrera v. Gamestop Corp.* (C.D. Cal. Nov. 29, 2010, No. CV
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1 09-1399) (\$700 an hour for partners; \$475 an hour for associates); *Magsafe Apple*
2 *Power Adapter Litig.*, No. 09-1911-EJD, 2015 U.S. Dist. LEXIS 11353, at *14 (N.D.
3 Cal. Jan. 30, 2015) (finding reasonable rates for Bay Area attorneys ranging from \$560
4 to \$800 for partners and \$285 to \$510 for associates); *Rose v. Bank of Am. Corp.*, No.
5 5:11-CV-02390-EJD, 2014 U.S. Dist. LEXIS 121641, at *12 (N.D. Cal. Aug. 29, 2014)
6 (finding reasonable partners rates between \$350 - \$775 per hour; associates at \$325 -
7 \$525 per hour; and paralegal rates between \$100 - \$305 per hour); *Kim v. Space Pencil,*
8 *Inc.*, No. C 11-03796 LB, 2012 WL 5948951, at *8 (N.D. Cal. Nov. 28, 2012) (finding
9 reasonable partner rates of \$725 - \$797 per hour; associates and counsel at \$350 - \$580
10 per hour); *Faigman v. AT&T Mobility LLC*, 2011 U.S. Dist. LEXIS 15825, * 2 (N.D.
11 Cal. Feb. 15, 2011) (approving hourly rates of \$650 an hour for partner services and
12 \$500 an hour for associate attorney services).

13 37. Capstone regularly litigates against prominent defense firms in Los
14 Angeles and San Francisco, including Sheppard, Mullin, Richter & Hampton (\$490 -
15 \$875 for partners and senior counsel; \$275 to \$535 an hour for associates), Cooley (\$660
16 - \$ 990 for partners, \$525 average rate for associates), and Morrison & Forester (\$595 -
17 \$1195 for partners, \$525 average rate for associates), as collected in a survey conducted
18 by the National Law Journal (“NLJ”) in 2013. (Attached as Exhibit 2 is a true and
19 correct copy of the NLJ survey.) The NLJ survey is widely accepted as evidence of
20 reasonable market rates. *See Building a Better Redondo, Inc. v. City of Redondo Beach*,
21 203 Cal. App. 4th 852, 871 (2012) (affirming rates for contingency fee attorneys in
22 Southern California based, in part, on the NLJ survey, which has partner rates of “\$475
23 to \$850 and associate rates from \$ 275 to \$505”); *Ctr. for Biological Diversity v. County*
24 *of San Bernardino*, 188 Cal. App. 4th 603, 615 (2010) (awarding market rates and
25 crediting the NLJ survey for, among other evidence, establishing the market rate).

26 **CONTINGENT RISK AND COMPLEXITY OF THE LITIGATION**

27 38. Capstone took this case purely on a contingency basis. This means that
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1 Capstone advanced over 12,000 attorney hours, spanning over four years, without
2 having been paid for its attorneys' efforts. Not only is the delay in payment part of the
3 contingent risk, but, prior to the Settlement, there was no assurance whatsoever of
4 receiving payment for the work performed on this case. Because attorneys pursuing
5 claims in contingency will sometimes lose after expending thousands of hours and
6 advancing tens of thousands of dollars in expenses, despite litigating diligently and
7 expertly, an enhancement ensures that the risks do not outstrip the incentive to pursue
8 claims on behalf of consumers.

9 39. This case presents substantial risk. First, this case against a major
10 automotive manufacturer alleging a defect in over a million Class Vehicles has the
11 potential to take up significant amounts of attorneys' time and Court resources. Had
12 litigation continued, Ford would have argued that no defect exists, or that, even if it did
13 exist, Plaintiffs would not be able to show that the defect constitutes a safety concern.
14 Ford would also be expected to argue that individual issues as to liability and damages
15 would prevail over common issues.

16 40. The technological issues in this case are complex, and Ford contends that
17 changes in the manufacturing process, design, and software created multiple versions of
18 the PowerShift Transmission, precluding the likelihood that one common defect exists.
19 Had litigation continued, Ford would likely have argued that the variations in the
20 Transmission and in the defects alleged also preclude class certification of the consumer
21 fraud claims for omission. In addition, Ford would have argued that, among other
22 individual variations, questions regarding each customer's proper maintenance of the
23 vehicle, driving conditions, and the reasonableness of repair attempts, such as whether
24 the vehicle was taken timely to the dealer for repairs, among others, would preclude
25 certification of the warranty claims. These are the types of defenses that, if accepted,
26 would support a denial of certification.

27 41. Aside from certification risk, Class Counsel could face the termination of
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1 their action at summary judgment or at trial. For instance, in another action against Ford
 2 involving a different vehicle, summary judgment was recently entered in favor of
 3 defendant after years of litigation, underscoring the high contingent risk borne by
 4 plaintiffs’ counsel in large-scale class actions. *See Coba v. Ford Motor Co.*, No. 12-
 5 1622-KM, 2017 WL 3332264 (D.N.J. Aug. 4, 2017).

6 42. Furthermore, in investigating and prosecuting this action, Class Counsel
 7 was required to understand the highly-advanced technology at issue, defeat a motion to
 8 dismiss, and fashion a sophisticated settlement to address a range of harms. Class
 9 Counsel’s skill, particularly in creating the Settlement and managing the Settlement
 10 process, also supports the application of a multiplier.

11 **COSTS ADVANCED BY CAPSTONE TO CLASS MEMBERS**

12 43. Capstone incurred and advanced a total of \$309,403.42 in costs and
 13 expenses—costs that would be normally billed to a fee-paying client—consisting of the
 14 following, based on information provided to me:

Cost & Expense Categories	Amount
Consultants	\$55,811.34
Copying, Printing & Scanning and Facsimiles	\$545.50
Court Fees, Courier Fees, Filings & Service of Process	\$2,680.91
Court Reporters, Transcripts & Depositions	\$3,284.51
Delivery & Messenger (UPS, FedEx, messenger, etc.)	\$583.83
Document Management and Production Services	\$877.40
Mediation Fees	\$33,097.45
N1 Discovery, LLC	\$6,541.36
NorthStar Litigation Technologies (database and document review)	\$174,437.50
Postage & Mailings	\$3,040.63
Research Services (PACER, Lexis, etc.)	\$265.80
S.A.S. Inc. (consultant)	\$1,000.00
Telephone (Long distance, conference calls, etc.)	\$131.75
Travel-Related Costs and Expenses	\$27,105.44
Total	\$309,403.42

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27 These expenses were reasonable and necessary to achieving this Settlement.
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CONTRIBUTIONS OF NAMED PLAINTIFFS

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2 44. The requested service awards for Capstone’s clients, \$10,000 for Omar
3 Vargas, \$7,500 each to Michelle Harris, Sharon Heberling, and Robert Bertone, and
4 \$5,000, each, to Kevin Klipfel and Andrew Klipfel, Plaintiffs in the *Klipfel* action, and
5 Maureen Cusick, Eric Dufour, Abigail Fisher, Christi Groshong, Virginia Otte, Tonya
6 Patze, Lindsay Schmidt, Patricia Schwennker and Patricia Soltesiz, Plaintiffs in the
7 *Cusick* action, are reasonable and appropriate.

8 45. The Named Plaintiffs are entitled to class representative payments for their
9 time and effort to support a case in which they had a modest personal interest but which
10 provided considerable benefits to Class Members—a commitment undertaken without
11 any guarantee of recompense. Each Named Plaintiff provided documents to, and
12 consulted with, counsel about the claims in this case, and assisted throughout the course
13 of the litigation. Each Plaintiff reviewed the allegations of the Complaint, kept in
14 constant contact with counsel regarding the status of the case, and responded to inquiries
15 regarding Ford and Ford dealers’ efforts to remedy the alleged defect. These Plaintiffs
16 have also stayed abreast of Settlement negotiations, reviewed the Settlement terms, and
17 approved the Settlement on behalf of the Class.

18 46. Plaintiff Vargas initiated this action in 2014, was deposed, and has been
19 involved consistently in this litigation since its inception, while Plaintiffs Harris,
20 Heberling, and Bertone provided their vehicles for inspection, responded to discovery,
21 produced documents, and sat for their depositions.

22 I declare under penalty of perjury under the laws of the United States of America
23 that the foregoing is true and correct. Executed this 21st day of August, 2017, at Los
24 Angeles, California.

25 /s/ Jordan L. Lurie
26 Jordan Lurie
27
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EXHIBIT 1



FIRM PROFILE

Capstone Law APC is one of California's largest plaintiff-only labor and consumer law firms. With thirty-two seasoned attorneys, many formerly with prominent class action or defense firms, Capstone has the experience, resources, and expertise to successfully prosecute complex employment and consumer actions.

Since its founding in 2012, Capstone has emerged as a major force in aggregate litigation, making law on cutting-edge issues and obtaining tens of millions of dollars in recovery for employees and consumers. The firm's accomplishments include:

- In February, 2015, three Capstone attorneys, Glenn A. Danas, Raul Perez, and Ryan H. Wu, were honored with the prestigious California Lawyer of the Year (CLAY) award in labor and employment for their work in the landmark case *Iskanian v. CLS Transportation Los Angeles*, 59 Cal. 4th 348 (2014), which preserved the right of California workers to bring representative actions under the Labor Code Private Attorneys General Act ("PAGA") notwithstanding a representative action waiver in an arbitration agreement.
- Recognized as a leading firm in the prosecution of PAGA enforcement actions, Capstone is responsible for some of the most important decisions in this area. In *Williams v. Superior Court (Marshalls of Calif.)*, 3 Cal.5th 531 (2017), Capstone attorneys achieved a landmark decision before the California Supreme Court as to the broad scope of discovery in PAGA actions. In *Baumann v. Chase Inv. Servs. Corp.*, 747 F.3d 1117 (9th Cir. 2014), a case of first impression, Capstone attorneys successfully argued that PAGA actions are state enforcement actions not covered by the Class Action Fairness Act.
- In April 2017, Capstone achieved a major victory for consumers in *McGill v. Citibank N.A.*, 2 Cal. 5th 945 (2017), where the California Supreme Court held that: (1) the right to seek public injunctive relief under the state's consumer protection laws cannot be waived; and (2) that consumers need not satisfy class certification requirements to enjoin unfair business practices on behalf of the public.
- Capstone serves as class counsel in a number of significant wage and hour settlements, including \$12 million on behalf of a nationwide class of nonexempt tellers and personal bankers in *Hightower v. JPMorgan Chase Bank*, Case No. 11-01802 (C.D. Cal.), over \$10 million on behalf of non-exempt hourly workers in *Zamora v. Balboa Life & Casualty LLC*, Case No. BC360026 (L.A. Super. Ct.); and \$6 million on behalf of non-exempt hourly workers in *Sheldon v. AHMC Monterey Park Hospital LP*, Case No. BC440282 (L.A. Super. Ct.).
- Capstone serves class counsel in a number of significant consumer actions, including *Falco v. Nissan N. Am. Inc.*, No. 13-00686-DDP (C.D. Cal.) (certifying a class of owners/lessees of Nissan vehicles with alleged timing chain defect on contested motion); *Batista v. Nissan N.Am., Inc.*, No. 14-24728-RNS (S.D. Fla.); *Klee v. Nissan North America*, Case No. 12-08238 (C.D. Cal.); *Aceves v. AutoZone, Inc.*, No. 14-2032 (C.D. Cal.); *Asghari v. Volkswagen Group of America*, No. 13-02529 (C.D. Cal.); *Aarons v. BMW of North America*, Case No. 11-7667 (C.D. Cal.); *Fernandez v. Home Depot U.S.A.*, No. 13-648 (C.D. Cal.), and *Ford v. CEC Entertainment*, No. 14-677 (S.D. Cal.), that have conferred benefits to class members valued in the hundreds of millions.



SUMMARY OF SIGNIFICANT SETTLEMENTS

In the past four years, Capstone has settled over 60 high-stakes class actions totaling over \$100 million dollars. Capstone's settlements have directly compensated hundreds of thousands of California workers and consumers. Capstone's actions have also forced employers to modify their policies for the benefit of employees, including changing the compensation structure for commissioned employees and changing practices to ensure that workers will be able to take timely rest and meal breaks. A leader in prosecuting PAGA enforcement actions, Capstone has secured millions of dollars in civil penalties for the State of California.

The following is a representative sample of Capstone's settlements:

- *Hightower et al v. Washington Mutual Bank*, No. 2:11-cv-01802-PSG-PLA (N.D. Cal.): gross settlement of \$12 million on behalf of approximately 150,000 personal bankers, tellers, sales associates, and assistant branch manager trainees for wage and hour violations;
- *Moore v. Petsmart, Inc.*, No. 5:12-cv-03577-EJD (N.D. Cal.): gross settlement of \$10 million on behalf of over 19,000 non-exempt PetSmart employees for wage and hour violations;
- *Perrin v. Nabors Well Services Co.*, No. 56-2007-00288718 (Ventura Super. Ct.): gross settlement of over \$6.5 million on behalf of oil rig workers for sleep time and other wage violations;
- *Cook v. United Insurance Co.*, No. C 10-00425 (Contra Costa Super. Ct.): gross settlement of \$5.7 million on behalf of approximately 650 sales representatives;
- *Alvarez v. MAC Cosmetics, Inc.*, No. CIVDS1513177 (San Bernardino Super. Ct.): gross settlement of \$5.5 million for approximately 5,500 non-exempt employees.
- *Aceves v. AutoZone, Inc.*, No. 14-2032 (C.D. Cal.): gross settlement of \$5.4 million in a case alleging FCRA violations;
- *Berry v. Urban Outfitters Wholesale, Inc.*, No. 13-02628 (N.D. Cal.): gross settlement of \$5 million on behalf of over 12,000 nonexempt employees;
- *The Children's Place Retail Stores Wage & Hour Cases*, No. JCCP 4790: gross settlement of \$5 million on behalf of 15,000 nonexempt employees;
- *York v. Starbucks Corp.*, Case No. 08-07919 (C.D. Cal.): gross settlement of nearly \$5 million on behalf of over 100,000 non-exempt workers for meal break and wage statement claims;
- *Rodriguez v. Swissport USA*, No. BC 441173 (Los Angeles Super. Ct.): gross settlement of nearly \$5 million on behalf of 2,700 non-exempt employees following contested certification;
- *Felix v. Auto Club of Southern Calif.*, Case No. 07CC01421 (Orange Cty. Super. Ct.): \$3.5 million settlement fund on behalf of over 2,000 insurance sales persons for wage and hour claims after taking this certified class action to trial;
- *Asghari v. Volkswagen Group of North America*, Case No. 13-02529 (C.D. Cal.): Settlement providing complementary repairs of oil consumption defect, reimbursement for repairs, and extended warranty coverage of certain Audi vehicles valued at over \$20 million;
- *Klee v. Nissan of North America*, Case No. 12-08238 (C.D. Cal.): Settlement providing complimentary electric vehicle charging cards and extending warranty coverage for the electric battery on the Nissan Leaf valued at over \$10 million.



PROFESSIONAL BIOGRAPHIES

Partners

Rebecca Labat. Rebecca Labat is the managing partner of Capstone Law APC. She supervises the pre-litigation phase for all of the firm's cases, including investigation, analysis, and client consultation. She also manages the firm's co-counsel relationships and assists the firm's other partners and senior counsel with case management and litigation strategy. Under Ms. Labat's leadership, Capstone has successfully settled over 35 cases, delivering tens millions of dollars to California employees and consumers while earning statewide recognition for its cutting-edge work in developing new law.

Ms. Labat's career accomplishments representing consumers and employees in class actions include the certification of a class of approximately 3,200 current and former automobile technicians and shop employees for the miscalculation of the regular rate for purposes of paying premiums for missed meal and rest breaks.

Before her work representing plaintiffs in class and representative actions, Ms. Labat was an attorney with Wilson Elser and represented life, health, and disability insurers in litigation throughout California in both state and federal courts. She graduated from the University of California, Hastings College of the Law in 2002, where she was a member of the Hastings Civil Justice Clinic, served as a mediator in Small Claims Court for the City and County of San Francisco, and received the CALI Award for Excellence in Alternative Dispute Resolution. She received her undergraduate degree from the University of California, Los Angeles. Ms. Labat is a member of the National Employment Lawyers Association (NELA), the Consumer Attorneys Association of Los Angeles (CAALA), and the Beverly Hills Bar Association.

Raul Perez. A partner at Capstone, Raul Perez has focused exclusively on wage and hour and consumer class litigation since 2011. Mr. Perez is the lead negotiator on numerous large settlements that have resulted in tens of millions to low-wage workers across California, including many of the most valuable settlements reached by Capstone.

During his career, Mr. Perez has successfully certified by way of contested motion and/or been appointed Lead Counsel or Interim Lead Counsel in several cases, including: *Lopes v. Kohl's Department Stores, Inc.*, Case No. RG08380189 (Alameda Super. Ct.); *Hightower v. JPMorgan Chase Bank*, Case No. 11-01802 (C.D. Cal.); *Tameifuna v. Sunrise Senior Living Managements, Inc.*, Case No. 13-02171 (C.D. Cal.) (certified class of over 10,000 hourly-paid employees); and *Berry v. Urban Outfitters Wholesale, Inc.*, Case No. 13-02628 (N.D. Cal.) (appointed lead counsel in a class action involving over 10,000 non-exempt employees). As the lead trial attorney in *Iskanian v. CLS Transportation Los Angeles*, 59 Cal. 4th 348 (2014), Mr. Perez, along with Mr. Danas and Mr. Wu, received the 2015 CLAY Award in labor and employment.

Mr. Perez received both his undergraduate degree and his law degree from Harvard University and was admitted to the California Bar in December 1994. Earlier in his career, Mr. Perez handled a variety of complex litigation matters, including wrongful termination and other employment related actions, for corporate clients while employed by some of the more established law firms in the State of California, including Morgan, Lewis & Bockius; Manatt Phelps & Phillips; and Akin Gump Strauss Hauer & Feld. Before Capstone, Mr. Perez was a partner at another large plaintiff's firm, helping to deliver millions of dollars in relief to California workers.

Matthew Theriault. Mr. Theriault is a partner at Capstone. An expert in wage-and-hour law and litigation strategy, Mr. Theriault currently manages and assists Capstone's class action certification efforts and trials.



Recently, Mr. Theriault was lead trial counsel in a rarely-seen class action trial, representing a certified class of insurance salespersons alleging unpaid wages and break premiums in *Felix v. Auto Club of Southern Calif.*, Case No. 07CC01421 (Orange Cty. Super. Ct.). The parties ultimately reached a multi-million dollar settlement in the middle of trial.

Over the course of his career, he has successfully certified numerous employee classes for claims involving misclassification, meal and rest breaks, and off-the-clock work, ultimately resulting in multi-million dollar settlements. Cases where Mr. Theriault was certified as class counsel include *Zamora v. Balboa Life & Casualty LLC*, Case No. BC360026 (L.A. Super. Ct.), *York v. Starbucks Corp.*, Case No. 08-07919 (C.D. Cal.), *In re: Taco Bell Wage And Hour*, 2013 U.S. Dist. LEXIS 380 (N.D. Cal.), *In Re: Autozone, Inc., Wage and Hour Employment Practices Litigation*, Case No.: 3:10-md-02159-CRB (E.D. Cal.), *Mansfield v. Brackenhoff Mgmt. Group, Inc.*, No. BC356188 (L.A. Super. Ct.), and *Blair v. Jo-Ann Stores, Inc.*, Case No. BC394795 (L.A. Super. Ct.).

Mr. Theriault graduated from the Western New England School of Law in Springfield, Massachusetts, and received his undergraduate degree with honors from the University of Connecticut. After graduation, Mr. Theriault practiced law in Connecticut starting in 2001. He litigated primarily consumer actions involving allegations of auto dealership fraud, loan financing, and unlawful debt collection practices. After moving to California, Mr. Theriault joined a large plaintiffs firm, where he litigated wage and hour class actions and was eventually made partner.

Glenn A. Danas. A partner at Capstone, Glenn A. Danas heads the complex motion and appeals practice group. A leading authority on arbitration law and PAGA actions, Mr. Danas was recently honored with the CLAY award for his work as lead counsel in *Iskanian v. CLS Transportation Los Angeles*, 59 Cal. 4th 348 (2014). Mr. Danas briefed and argued this closely-watched case before the California Supreme Court, which resulted in a landmark decision that preserved employees' right to pursue PAGA actions notwithstanding a waiver in an arbitration agreement. Mr. Danas was also recognized by The Daily Journal as one of California's Top 20 Lawyers Under 40 for 2013 and as one of the Top 75 Labor & Employment Lawyers in California for 2017.

Mr. Danas has argued over twenty appeals in the California Court of Appeal, the California Supreme Court, and the Ninth Circuit Court of Appeals, and has served as lead appellate counsel in many more. While at Capstone, Mr. Danas argued before the California Supreme Court in three major victories for the plaintiffs: *Iskanian*, *McGill v. Citibank N.A.*, 2 Cal. 5th 945 (2017), and *Williams v. Superior Court*, 2017 WL 2980258 (2017). He also argued in the Ninth Circuit in *Baumann v. Chase Inv. Servs. Corp.*, 747 F.3d 1117 (9th Cir. 2014), *Chavarria v. Ralphs Grocery Co.*, 733 F.3d 916 (2013), which held that arbitration agreements may not be enforced if found unconscionable under general state contract law, and *Allen v. Bedolla*, 787 F.3d 1218 (9th Cir. 2015), which made law on judicial scrutiny of class action settlements. Prior to joining Capstone, Mr. Danas successfully briefed and argued the precedent-setting appeal in *Brown v. Ralph's Grocery Co.*, 197 Cal. App. 4th 489 (2011), regarding the unenforceability of PAGA waivers. Mr. Danas also successfully defeated an appeal of a motion to remand under the CAFA "local controversy exception" in *Coleman v. Estes Express Lines, Inc.*, 631 F.3d 1010 (9th Cir. 2011), establishing a new standard on when the circuit court may grant review in a discretionary appeal under CAFA.

Mr. Danas graduated from Emory University School of Law in 2001 with honors and authored *The Interstate Class Action Jurisdiction Act of 1999: Another Congressional Attempt to Federalize State Law*, 49 EMORY L.J. 1305 (2000), which was selected by the ABA as one of the top three student-written law journal articles in its annual nationwide competition. He received his undergraduate degree in Industrial and Labor Relations from Cornell University. After law school, he clerked for the Honorable U.W. Clemon, Chief U.S. District Judge



for the Northern District of Alabama and began his career at an international law firm in New York City, where he primarily focused on antitrust and securities litigation.

Melissa Grant. Melissa Grant is a partner at Capstone. Ms. Grant is responsible for litigating many of the firm's most contentious and high-stakes class actions. The author of numerous successful motions for class certification, Ms. Grant is the lead or co-lead attorney on four certified class actions currently on track for trial, representing over 140,000 California employees in pursuing their wage and hour claims. She is also at the forefront in developing the law on PAGA, including administrative exhaustion, the scope of discovery, and PAGA trials. In *Williams v. Veolia Transp. Svcs.*, Case No. 08-02582 (C.D. Cal.), Ms. Grant's tenacious prosecution led to a settlement with civil penalty payment of \$230,000, one of the largest on record for a PAGA enforcement action.

Prior to joining Capstone, Ms. Grant worked at the Securities and Exchange Commission as a staff attorney in the Enforcement Division, investigating ongoing violations of federal securities regulations and statutes and for Quinn Emanuel Urquhart & Sullivan, LLP, where she was an associate on the trial team that prosecuted the *Mattel v. Bratz* case. Ms. Grant began her legal career as a law clerk to the Honorable Harry Pregerson, Justice of the Ninth Circuit Court of Appeals before joining Sidley & Austin as an associate. She graduated from Southwestern Law School in 1999, where she served as editor-in-chief of the Law Review, and graduated *summa cum laude* and first in her class. Ms. Grant earned her undergraduate degree from Cornell University, where she received the JFK Public Service Award and the Outstanding Senior Award. Her published articles include: *Battling for ERISA Benefits in the Ninth Circuit: Overcoming Abuse of Discretion Review*, 28 Sw. U. L. Rev. 93 (1998), and CLE Class Actions Conference (SF) CAFA: *Early Decisions on Commencement and Removal of Actions* (2006).

Of Counsel

Jordan Lurie. A renowned class action litigator, Jordan Lurie heads the automotive defect litigation practice group at Capstone, prosecuting cases involving violations of state and federal consumer protection laws, the Fair Credit Reporting Act, federal and state privacy laws, and federal securities law. Mr. Lurie has prosecuted class actions against major car manufacturers, and is serving (or has served as) class counsel in: *Falco v. Nissan N. Am. Inc.*; *Vargas v. Ford Motor. Co.*; *Batista v. Nissan N.Am., Inc.*; and *Chan v. Porsche Cars N.A., Inc.* Mr. Lurie helped negotiate class benefits valued in the tens of millions in *Klee v. Nissan N. Am.*; *Asghari v. Volkswagen Group of America*; and *Aarons v. BMW of N. Am.*

Over his distinguished career, Mr. Lurie also has obtained settlements in excess of \$100 million in actions where he was lead or co-lead counsel. Notable cases where Jordan served as lead counsel include: *In re: Apria Healthcare Group Secs. Litig.*, where Jordan settled on behalf of investors for \$42 million in a securities fraud class action; *Morganstein v. Aura Systems*, where he settled claims for \$18 million in a securities fraud class action; *In re Quintus Secs. Litig.*, a securities fraud class action which settled for \$10.1 million; and *In re Southern Pacific Funding Corp., Sec. Litig.*, Case No. Civ. 98-1239-MA, (D. Or.), where he settled a class action for \$19.5 million. Mr. Lurie has been selected as one of Southern California's "Super Lawyers" every year from 2012 through 2016.

Prior to joining Capstone, Mr. Lurie spent most his career at a national plaintiffs' law firm specializing in corporate securities and consumer class actions, where he was the managing partner of the firm's Los Angeles office. Mr. Lurie graduated from the University of Southern California Gould School of Law in 1987, where he was Notes Editor of the University of Southern California Law Review. He received his undergraduate



degree with honors from Yale University. When not litigating, Mr. Lurie is an active educator and community leader. Jordan participated in the first Wexner Heritage Foundation leadership program in Los Angeles and holds leadership and executive positions in various organizations in the Los Angeles community. He has also been the featured speaker at California MCLE seminars regarding securities fraud and class actions, and has authored several publications for the California Continuing Education of the Bar.

Senior Counsel

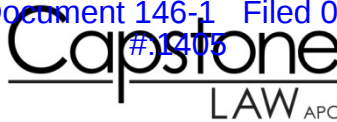
Jennifer Bagosy. Jennifer Bagosy is a senior counsel with Capstone Law, specializing in employment and consumer class action litigation, with an emphasis on trial preparation. She began her career as a litigation associate with Howrey LLP, first in Washington, D.C., and then in Irvine, California. At Howrey, she participated in two trials and two appeals in *Fifth Third Bank v. United States*, a breach of contract case arising from the S&L crisis of the 1980s, winning and upholding on appeal a \$76.5 million verdict for the client. She also participated in trial in *Imageexpo v. Microsoft*, a patent infringement case, which resulted in a \$62 million verdict for the client. Ms. Bagosy joined the firm of Morgan, Lewis & Bockius in 2011, where she specialized in securities litigation, D&O liability litigation, bank-failure related litigation, and professional liability. Jennifer graduated from Georgetown University Law Center in 2002. She received her undergraduate degree in Political Science from Bradley University, where she graduated summa cum laude.

Ms. Bagosy is admitted to practice law in California and before the United States District Court for the Eastern, Central, and Southern Districts of California, as well as the Ninth Circuit Court of Appeals, the Federal Circuit Court of Appeals, and the United States Supreme Court. She is actively involved in the Orange County Bar Association, where she is a member of the Professionalism & Ethics Committee.

Liana Carter. Liana Carter is a senior counsel with Capstone Law APC, specializing in complex motions, writs, and appeals. Her work on recent appeals has included successfully defeating a challenge to overturn the denial of a motion to compel arbitration in *Jacoby v. Islands Rests., L.P.*, 2014 Cal. App. Unpub. LEXIS 4366 (2014) and reversal of a dismissal of class claims in *Rivers v. Cedars-Sinai Med. Care Found.*, 2015 Cal. App. Unpub. LEXIS 287 (Jan. 13, 2015). Along with Mr. Danas, Ms. Carter was responsible for drafting the successful petition for review in *McGill v. Citibank N.A.*, as well as the petition for review and briefing on the merits in *Williams v. Superior Court*, 2017 WL 2980258. Ms. Carter also has extensive prior experience in overseeing settlement negotiations and obtaining court approval of class action settlements.

Ms. Carter was admitted to the California bar in 1999 after graduating from the University of Southern California Gould School of Law, where she was an Articles Editor on the board of the *Southern California Law Review*. She received her undergraduate degree with honors from the University of California, Irvine.

Robert Drexler. Robert Drexler is a senior counsel with Capstone Law where he leads one of the firm's litigation teams prosecuting wage-and-hour class actions. He has more than 25 years of experience representing clients in wage-and-hour and consumer rights class actions and other complex litigation in state and federal courts. Over the course of his career, Mr. Drexler has successfully certified dozens of employee classes for claims such as misclassification, meal and rest breaks, and off-the-clock work, ultimately resulting in multi-million dollar settlements. He has also arbitrated and tried wage-and-hour and complex insurance cases. Mr. Drexler has been selected as one of Southern California's "Super Lawyers" every year from 2009 through 2015.



Before joining Capstone, Mr. Drexler was head of the Class Action Work Group at Khorrami Boucher, LLP and led the class action team at The Quisenberry Law Firm. Mr. Drexler graduated from Case Western Reserve University School of Law, where he served as Managing Editor of the Case Western Reserve Law Review and authored *Defective Prosthetic Devices: Strict Tort Liability for the Hospital?* 32 CASE W. RES. L. REV. 929 (1982). He received his undergraduate degree in Finance at Ohio State University where he graduated *cum laude*. Mr. Drexler is a member of Consumer Attorneys of California (CAOC) and Consumer Attorneys of Los Angeles (CAALA). He has been a featured speaker at class action and employment litigation seminars, and has published articles in CAOC's Forum Magazine and The Daily Journal.

Robert Friedl. Robert Friedl is a senior counsel at Capstone, where he devotes most of his time to the briefing and litigation strategy of consumer protection cases. Mr. Friedl has over 20 years of experience representing plaintiffs and defendants in consumer class actions, insurance coverage and defense, employment law, and personal injury. His lengthy service as an appellate attorney has yielded several published cases, including successful outcomes in *Goldstein v. Ralphs*, 122 Cal. App. 4th 229 (2004), *Morgan v. AT&T*, 177 Cal. App. 4th 1235 (2009), and *Hecimovich v. Encinal School Parent Teacher Organization*, 203 Cal. App. 4th 450 (2012). At Capstone, Mr. Friedl was responsible for the appellate win in *Grant v. Unifund CCR, LLC*, 577 Fed. Appx. 693 (9th Cir. 2014).

Prior to joining Capstone, Mr. Friedl was a partner at civil litigation boutique, where he handled the firm's most complex briefing. He is a graduate of the University of Connecticut, and received his law degree from Southwestern School of Law, where he earned an American Jurisprudence Book Award.

Katherine Kehr. A senior counsel at Capstone, Katherine Kehr prosecutes aggregate actions on behalf of California workers, handling all aspects of wage and hour litigation. While at Capstone, Ms. Kehr developed expertise on issues relating to arbitration and PAGA issues. At Capstone, Ms. Kehr was the primary attorney on *Brown v. Super. Ct. (Morgan Tire)*, 216 Cal. App. 4th 1302 (2013) (superseded by grant of review), as well as the primary drafter of the intermediate court briefing in *Iskamian*. Recently, Ms. Kehr was one of the primary drafters of a contested motion for class certification, by which Capstone successfully certified a class and was appointed class counsel in *Romo v. GMRI, Inc.*, Case No. 12-cv-00715-JLQ-SP (C.D. Cal.).

Ms. Kehr graduated from the University of Southern California Gould School Of Law in 2002, where she was a member of the Moot Court Honors Program. After law school, she clerked for the Honorable Richard D. Savell of the Alaska Superior Court and the Honorable Anthony J. Mohr of the Los Angeles Superior Court. Ms. Kehr received her undergraduate degree in French literature *cum laude* from Bryn Mawr College. She received her training as an associate at Selman Breitman LLP, where she handled all aspects of pre-trial litigation, in both state and federal court.

Bevin Allen Pike. Bevin Allen Pike is a senior counsel with Capstone Law where she focuses primarily on wage-and-hour class actions. Ms. Pike has spent her entire legal career representing employees and consumers in wage-and-hour and consumer rights class actions. Over the course of her career, Ms. Pike has successfully certified dozens of employee and consumer classes for claims such as meal and rest breaks, unpaid overtime, off-the-clock work, and false advertising.

Before joining Capstone, Ms. Pike's experience included class and representative action work on behalf of employees and consumers at some of the leading plaintiffs' firms in California. Ms. Pike graduated from Loyola Law School, Los Angeles, where she was an Editor for the International and Comparative Law Review. She received her undergraduate degree from the University of Southern California. Ms. Pike has



been selected as one of Southern California's "Super Lawyers – Rising Stars" every year from 2012 through 2015.

Ryan H. Wu. Ryan H. Wu is a senior counsel at Capstone and is primarily responsible for complex motion work and supervising court approval of class action settlements. Mr. Wu handles many of the most challenging legal issues facing Capstone's clients, including the scope and operation of PAGA, contested attorneys' fees motions, and responding to objectors. Mr. Wu is responsible for the merits briefing in the landmark *McGill v. Citibank, N.A.*, 2 Cal. 5th 945 (2017), which protected consumers' right to pursue public injunctive relief, and *Williams v. Superior Court*, 3 Cal.5th 531(2017), where the California Supreme Court set discovery guidelines in PAGA actions. Mr. Wu also authored the appellate briefs in *Baumann v. Chase Inv. Servs. Corp.*, 747 F.3d 1117 (9th Cir. 2014), where, on an issue of first impression, the Ninth Circuit sided with Plaintiffs in holding that PAGA actions are state enforcement actions not covered by the CAFA. In February 2015, Mr. Wu, along with Mr. Danas and Mr. Perez, received the prestigious CLAY award for his successful appellate work, including briefing to the California Supreme Court, in *Iskanian*.

Mr. Wu graduated from the University of Michigan Law School in 2001, where he was an associate editor of the *Michigan Journal of Law Reform* and contributor to the law school newspaper. He received his undergraduate degree in political science with honors from the University of California, Berkeley. He began his career litigating international commercial disputes and commercial actions governed by the Uniform Commercial Code. Mr. Wu is co-author of "*Williams v. Superior Court: Employees' Perspective*" and "*Iskanian v. CLS Transportation: Employees' Perspective*," both published in the *California Labor & Employment Law Review*.

Associates

Arnab Banerjee. Arnab Banerjee is an associate with Capstone, where he litigates employment and consumer class actions. Mr. Banerjee's practice focuses primarily on wage and hour class action litigation where he has worked on more than 50 class action cases on behalf of employees for the failure to pay overtime and minimum wages, the failure to provide meal and rest breaks, and helping to obtain millions of dollars in recovery for employees. Admitted to the Bar in 2007, Mr. Banerjee began his career and received his training as an associate at Latham & Watkins LLP, where he handled all aspects of pre-trial litigation, in both state and federal court in a wide variety of business litigation matters ranging from white collar defense to environmental litigation. Mr. Banerjee graduated from the University of Southern California Gould School Of Law, where he was an editor on the Interdisciplinary Law Journal, and received his undergraduate degrees in Political Science and Sociology, with a minor in Humanities and Law from the University of California, Irvine where he graduated *cum laude* and Phi Beta Kappa.

Brandon Brouillette. Brandon Brouillette is an associate with Capstone Law, where his practice focuses on representing employees and consumers in complex litigation, primarily wage-and-hour class actions and PAGA representative actions. His entire legal career has been devoted to representing individual and class representative plaintiffs against large corporate entities. Prior to joining Capstone, Mr. Brouillette served as an associate at Boucher LLP where he managed the firm's wage-and-hour class actions. He earned his Juris Doctor from Loyola Law School, Los Angeles, where he spent a summer interning for the legal clearance and corporate legal departments at Warner Bros. He received his undergraduate degree from the University of Southern California and is admitted to practice in California and before the United States District Court for the Northern and Central Districts of California. In 2016, Mr. Brouillette was selected as one of Super Lawyers' "Rising Stars" in Southern California.



Anthony Castillo. Anthony Castillo is an associate with Capstone Law. His practice focuses on analyzing pre-litigation wage-and-hour and consumer claims, including claims for overtime wages, meal and rest periods, and off-the-clock work violations. Prior to joining Capstone, he was an associate at a California bankruptcy practice, where he represented individual and business debtors in liquidations and re-organizations as well as various debt and foreclosure defense-related issues. Mr. Castillo graduated from Loyola Law School, Los Angeles in 2009, where he volunteered with the Disability Rights Legal Center. He attended Stanford University for his undergraduate degree, majoring in Political Science and minoring in History. Anthony is admitted to practice law in California and Washington and before the United States District Court for the Central and Southern Districts of California.

Ruhandy Glezakos. Ruhandy Glezakos is an associate with Capstone Law. He works on behalf of employees, focusing primarily on wage-and-hour class action litigation for failure to pay overtime and minimum wages, failure to provide meal and rest breaks, and other Fair Labor Standards Act and California Labor Code violations. Mr. Glezakos advocates passionately for those in need and has extensive experience working in public interest, particularly for low-wage workers and undocumented communities. Ruhandy graduated from UCLA School of Law. During law school, he served as a judicial extern for the Honorable Harry Pregerson, Ninth Circuit Court of Appeals. He received his undergraduate degree from the University of California, Los Angeles where he graduated cum laude.

Jamie Greene. Jamie Greene is an associate with Capstone where she evaluates potential new cases, develops new claims, and manages client relations. Well-versed in wage and hour law and federal and state consumer protection statutes, Ms. Greene supervises the pre-litigation phase for all cases, including investigation, analysis, and client consultation. Ms. Greene began her legal career at Makarem & Associates representing clients in a wide array of cases ranging from wrongful death, insurance bad faith, employment, personal injury, construction defect, consumer protection, and privacy law. She is a graduate of the University of Southern California Gould School of Law and earned her bachelor's degree from Scripps College in Claremont, California. She is an active member of the Consumer Attorneys Association of Los Angeles (CAALA), and the Beverly Hills, Los Angeles County, and Santa Monica Bar Associations.

Robin Hall. Robin Hall is an associate with Capstone Law, where she heads the firm's research department. Ms. Hall assists in pre-litigation investigation of employment and consumer statutory claims, and handles complex research projects. A founding editor of the Impact Litigation Journal (ILJ), Ms. Hall has authored numerous articles on emerging legal issues published on ILJ. Ms. Hall began her career and received her training as an associate at Baker & Hostetler LLP, where she represented Fortune 500 companies in labor and employment litigation, including class actions. She attended Indiana University's Maurer School of Law, where she graduated *cum laude* in 2007. During law school, Ms. Hall served as Editor-in-Chief of the Indiana Journal of Global Legal Studies and Director of the Inmate Legal Assistance Clinic. She received her undergraduate degree from the University of Missouri and is admitted to practice law in California.

Jonathan Lee. An associate with Capstone, Jonathan Lee primarily litigates employment class actions. At Capstone, Mr. Lee has worked on several major successful class certification motions, and his work has contributed to multi-million dollar class settlements against various employers, including restaurant chains, retail stores, airport staffing companies, and hospitals. Prior to joining Capstone, Mr. Lee defended employers and insurance companies in workers' compensation actions throughout California. Mr. Lee graduated in 2009 from Pepperdine University School of Law, where he served as an editor for the Journal of Business, Entrepreneurship and the Law; he received his undergraduate degree from UCLA.



Suzy E. Lee. Suzy Lee, an associate with Capstone, litigates complex matters with a focus on wage-and-hour class actions. Ms. Lee has successfully litigated wage and hour class actions and single plaintiff cases in other practice areas, including consumer fraud, commercial litigation, personal injury, and employment discrimination. Prior to joining Capstone, Ms. Lee was an associate at several prominent plaintiff firms, where she litigated complex wage and hour and consumer class actions in state and federal courts. Ms. Lee also has experience defending businesses in cases involving contract disputes and other business litigation matters. Ms. Lee graduated from the Indiana University Maurer School of Law, where she served as the President of the Asian Pacific American Association. She received her undergraduate degree from the University of California, Irvine, where she graduated *cum laude*. Ms. Lee is proficient in Korean.

Trisha Monesi. Trisha Monesi is an associate with Capstone Law. Her practice focuses on client consultation, claim identification, investigation, analysis, and development of new automotive defect class actions and other consumer class actions. She graduated from Loyola Law School, Los Angeles in 2014, where she served as an editor of the Loyola of Los Angeles Entertainment Law Review and was a certified law clerk at the Center for Juvenile Law and Policy. She earned her undergraduate degree from Boston University in 2011, where she majored in Political Science and International Relations. She is an active member of the Women Lawyers Association of Los Angeles, and the Los Angeles County and Beverly Hills Bar Associations. Trisha is admitted to practice law in California and before the United States District Court for the Central District of California.

Cody Padgett. An associate with Capstone, Cody Padgett's practice focuses on prosecuting automotive defect and other consumer class action cases in state and federal court. He handles consumer cases at all stages of litigation, and has contributed to major settlements of automobile defect actions valued in the tens of millions. Prior to joining Capstone Law, Mr. Padgett was a certified legal intern with the San Diego County Public Defender's Office. During law school, Mr. Padgett served as a judicial extern to the Honorable C. Leroy Hansen, United States District Court for the District of New Mexico. He graduated from California Western School of Law in the top 10% of his class and received his undergraduate degree from the University of Southern California, where he graduated *cum laude*.

Eduardo Santos. Eduardo Santos, an associate at Capstone, represents employees and consumers in class action litigation, with a special focus on negotiating, structuring, managing, and obtaining court approval of Capstone's class action settlements. Having assisted in obtaining court-approval of over 60 wage and hour and consumer class action settlements during the course of his career, Mr. Santos has contributed significantly to the high approval rate of Capstone's settlements. Before joining Capstone, Mr. Santos was an associate at one of California's largest plaintiffs-only employment law firms, and prior to that, an associate at a prominent plaintiff's firm specializing in mass torts litigation, where he was part of a team that secured a total of \$4.85 billion for thousands of individuals with claims of injuries caused by taking Vioxx. Mr. Santos received his JD from Loyola Law School of Los Angeles in 2007, which he attended on a full academic scholarship. While in law school, he was an extern for the Honorable Thomas L. Willhite, Jr. of the California Court of Appeal. He graduated *magna cum laude* from UCLA with majors in Political Science and History, and was a recipient of the Ralph J. Bunche scholarship for academic achievement.

Mao Shiokura. Mao Shiokura is an associate with Capstone. Her practice focuses on identifying, analyzing, and developing new wage-and-hour and consumer claims, including violations of the Fair Credit Reporting Act, Consumers Legal Remedies Act, False Advertising Law, and Unfair Competition Law. Prior to joining Capstone, Ms. Shiokura was an associate at a California lemon law firm, where she represented consumers in



Song-Beverly, Magnuson-Moss, and fraud actions against automobile manufacturers and dealerships. Ms. Shiokura graduated from Loyola Law School, Los Angeles in 2009, where she served as a staff member of Loyola of Los Angeles Law Review. She earned her undergraduate degree from the University of Southern California, where she was a Presidential Scholar and majored in Business Administration, with an emphasis in Cinema-Television and Finance.

Natalie Torbati. Natalie Torbati is an associate with Capstone Law. Her practice focuses on the firm's major motions and trials. Prior to joining Capstone, she was an associate at a prominent plaintiff's firm, where she successfully litigated, mediated, and settled many single-plaintiff employment discrimination, harassment, and retaliation cases. Ms. Torbati obtained her Juris Doctor from UCLA School of Law in 2014, where she served as a writing advisor for UCLA Law's prestigious Lawyering Skills Program, Business Manager for the Women's Law Journal, and Co-Social Chair for the Jewish Law Students Association. She earned her undergraduate degree from the University of Southern California, where she graduated summa cum laude, majoring in Sociology and minoring in Business Law. Natalie is an active member of the Los Angeles County and Beverly Hills Bar Associations, and is admitted to practice law in California. She is fluent in Farsi and proficient in Spanish.

Karen Wallace. An associate with Capstone, Karen Wallace handles the pre-litigation phase for prospective cases including investigation, claim identification and analysis, and client consultation. Ms. Wallace's expertise includes claims for meal and rest period violations, overtime wages, off-the-clock work, misclassification, and other employment and consumer claims. Before attending Southwestern Law School, Ms. Wallace worked as a teacher for many years. She received her doctorate in English from the University of California, Los Angeles, where she also earned her master's degree in American Indian Studies.

Tarek Zohdy. An associate with Capstone, Tarek Zohdy litigates automotive defect class actions, along with other consumer class actions for breach of warranty and consumer fraud. At Capstone, he has worked on several large-scale automotive class action settlements that have provided significant relief to thousands of defrauded car owners. Before joining Capstone, Mr. Zohdy spent several years representing individual consumers in their actions against automobile manufacturers and dealerships for breaches of express and implied warranties pursuant to the Song-Beverly Consumer Warranty Act and the Magnuson-Moss Warranty Act, commonly referred to together as "Lemon Law." He also handled fraudulent misrepresentation and omission cases pursuant to the Consumers Legal Remedies Act. Mr. Zohdy graduated from Louisiana State University *magna cum laude* in 2003, and Boston University School of Law in 2006, where he was a member of the criminal clinic representing underprivileged criminal defendants.

OUTREACH AND EDUCATION

To increase public awareness about the issues affecting class action and other representative litigation in the consumer and employment areas, Capstone publishes the Impact Litigation Journal (www.impactlitigation.com). Readers have access to news bulletins, op-ed pieces, and legal resources. By taking advantage of social media, Capstone hopes to spread the word about consumer protection and employee rights to a larger audience than has typically been reached by traditional print sources, and to thereby contribute to the enforcement of California's consumer and workplace protection laws.

EXHIBIT 2



2013 NLJ Billing Survey

Source: National Law Journal

Category: National Law Journal

The National Law Journal's survey of billing rates of the largest U.S. law firms provides the high, low and average rates for partners and associates.

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#1412

Year	Firm Name	Location	Average FTE Attorneys	Partner Billing Rate High	Partner Billing Rate Low	Partner Billing Rate Avg	Associate Billing Rate High	Associate Billing Rate Low	Associate Billing Rate Avg	Counsel Avg	Counsel Low	Counsel High	NLJ Billing Source	Notes
2013	Adams and Reese	New Orleans, LA	277	\$650.00	\$275.00	\$390.00	\$320.00	\$200.00	\$260.00	\$460.00	\$405.00	\$500.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Akerman Senterfitt	Miami, FL	502	\$610.00	\$350.00	\$480.00	\$425.00	\$175.00	\$300.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Akin Gump Strauss Hauer & Feld	Washington, DC	806	\$1220.00	\$615.00	\$785.00	\$660.00	\$365.00	\$525.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Allen Matkins Leck Gamble Mallory & Natsis	Los Angeles, CA	187	\$680.00	\$525.00	\$615.00							National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Alston & Bird	Atlanta, GA	805	\$875.00	\$495.00	\$675.00	\$575.00	\$280.00	\$425.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Andrews Kurth	Houston, TX	348	\$1090.00	\$745.00	\$890.00	\$1090.00	\$265.00	\$670.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Archer & Greiner	Haddonfield, NJ	208	\$460.00	\$330.00	\$400.00	\$295.00	\$200.00	\$245.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Arent Fox	Washington, DC	323	\$860.00	\$500.00	\$650.00	\$595.00	\$275.00	\$395.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Arnall Golden Gregory	Atlanta, GA	139	\$520.00	\$430.00	\$490.00							National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Arnold & Porter	Washington, DC	748	\$950.00	\$670.00	\$815.00	\$610.00	\$345.00	\$500.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Arnstein & Lehr	Chicago, IL	141	\$595.00	\$350.00	\$465.00	\$350.00	\$175.00	\$250.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Baker & Hostetler	Cleveland, OH	810	\$685.00	\$250.00	\$450.00	\$455.00	\$120.00	\$260.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.

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2013	Baker & McKenzie	Chicago, IL	4004	\$1130.00	\$260.00	\$755.00	\$925.00	\$100.00	\$395.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Baker, Donelson, Bearman, Caldwell & Berkowitz	Memphis, Tenn.	587	\$495.00	\$340.00	\$400.00	\$465.00	\$245.00	\$295.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Ballard Spahr	Philadelphia, PA	479	\$650.00	\$395.00	\$475.00	\$495.00	\$235.00	\$315.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Barnes & Thornburg	Indianapolis, IN	487	\$580.00	\$330.00	\$480.00	\$370.00	\$260.00	\$320.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Benesch, Friedlander, Coplan & Aronoff	Cleveland, OH	150	\$635.00	\$360.00	\$455.00	\$475.00	\$155.00	\$280.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Best Best & Krieger	Riverside, CA	175	\$655.00	\$340.00	\$455.00	\$385.00	\$235.00	\$280.00	\$435.00	\$325.00	\$565.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Bingham McCutchen	Boston, MA	900	\$1080.00	\$220.00	\$795.00	\$605.00	\$185.00	\$450.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Blank Rome	Philadelphia, PA	471	\$940.00	\$445.00	\$640.00	\$565.00	\$175.00	\$350.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Bond, Schoeneck & King	Syracuse, NY	194	\$520.00	\$240.00	\$355.00	\$285.00	\$160.00	\$225.00	\$385.00	\$295.00	\$485.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Bowles Rice	Charleston, WV	128	\$285.00	\$165.00	\$230.00	\$180.00	\$115.00	\$135.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Bracewell & Giuliani	Houston, TX	432	\$1125.00	\$575.00	\$760.00	\$700.00	\$275.00	\$440.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Bradley Arant Boult Cummings	Birmingham, AL	396	\$605.00	\$325.00	\$430.00	\$340.00	\$200.00	\$260.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Broad and Cassel	Orlando, FL	160	\$465.00	\$295.00	\$380.00							National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.

#1414

2013	Brownstein Hyatt Farber Schreck	Denver, CO	216	\$700.00	\$310.00	\$520.00	\$345.00	\$265.00	\$305.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Bryan Cave	St. Louis, MO	990	\$860.00	\$405.00	\$590.00	\$570.00	\$210.00	\$405.00	\$600.00	\$320.00	\$810.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Buchalter Nemer	Los Angeles, CA	134	\$695.00	\$475.00	\$605.00	\$375.00	\$350.00	\$365.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Burr & Forman	Birmingham, AL	249	\$525.00	\$240.00	\$355.00	\$350.00	\$200.00	\$245.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Butzel Long	Bloomfield Hills, MI	125	\$535.00	\$350.00	\$440.00	\$415.00	\$215.00	\$305.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Cadwalader, Wickersham & Taft	New York, NY	435	\$1050.00	\$800.00	\$930.00	\$750.00	\$395.00	\$605.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Carlton Fields	Tampa, FL	276	\$840.00	\$455.00	\$600.00							National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Connell Foley	Roseland, NJ	121	\$575.00	\$275.00	\$425.00	\$325.00	\$200.00	\$265.00	\$450.00	\$275.00	\$625.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Cooley	Palo Alto, CA	632	\$990.00	\$660.00	\$820.00	\$630.00	\$160.00	\$525.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Covington & Burling	Washington, DC	738	\$890.00	\$605.00	\$780.00	\$565.00	\$320.00	\$415.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Cox Smith Matthews	San Antonio, TX	117	\$595.00	\$395.00	\$505.00	\$485.00	\$230.00	\$320.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Cozen O'Connor	Philadelphia, PA	509	\$1050.00	\$300.00	\$555.00	\$590.00	\$235.00	\$345.00	\$560.00	\$360.00	\$790.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Curtis, Mallet-Prevost, Colt & Mosle	New York, NY	322	\$860.00	\$730.00	\$800.00	\$785.00	\$345.00	\$480.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.

#1415

2013	Davis Graham & Stubbs	Denver, CO	146	\$595.00	\$350.00	\$435.00	\$340.00	\$150.00	\$245.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Davis Polk & Wardwell	New York, NY	787	\$985.00	\$850.00	\$975.00	\$975.00	\$130.00	\$615.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Debevoise & Plimpton	New York, NY	615	\$1075.00	\$955.00	\$1055.00	\$760.00	\$120.00	\$490.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Dechert	New York, NY	803	\$1095.00	\$670.00	\$900.00	\$735.00	\$395.00	\$530.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Dentons			\$1050.00	\$345.00	\$700.00	\$685.00	\$210.00	\$425.00				National Law Journal, December 2013	Location and Average FTE Attorneys' data not available due to merger in 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Dickstein Shapiro	Washington, DC	308	\$1250.00	\$590.00	\$750.00	\$585.00	\$310.00	\$475.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Dinsmore & Shohl	Cincinnati, OH	422	\$850.00	\$250.00	\$400.00	\$350.00	\$140.00	\$235.00	\$345.00	\$140.00	\$615.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	DLA Piper	New York, NY	4036	\$1025.00	\$450.00	\$765.00	\$750.00	\$250.00	\$510.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Dorsey & Whitney	Minneapolis, MN	517	\$585.00	\$340.00	\$435.00	\$510.00	\$215.00	\$315.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Duane Morris	Philadelphia, PA	613	\$710.00	\$430.00	\$620.00	\$490.00	\$295.00	\$370.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Edwards Wildman Palmer	Boston, MA	572	\$765.00	\$210.00	\$535.00	\$415.00	\$245.00	\$325.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Faegre Baker Daniels	Minneapolis, MN	683	\$580.00	\$355.00	\$455.00	\$315.00	\$110.00	\$260.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Foley & Lardner	Milwaukee, WI	872	\$860.00	\$405.00	\$600.00	\$470.00	\$210.00	\$335.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.

#1416

2013	Foley Hoag	Boston, MA	223	\$775.00	\$590.00	\$670.00	\$385.00	\$290.00	\$325.00					National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Fox Rothschild	Philadelphia, PA	490	\$750.00	\$335.00	\$530.00	\$500.00	\$245.00	\$310.00					National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Fried, Frank, Harris, Shriver & Jacobson	New York, NY	476	\$1100.00	\$930.00	\$1000.00	\$760.00	\$375.00	\$595.00					National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Gardere Wynne Sewell	Dallas, TX	223	\$775.00	\$430.00	\$635.00	\$445.00	\$235.00	\$310.00					National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Gibbons	Newark, NJ	210	\$865.00	\$440.00	\$560.00	\$475.00	\$295.00	\$360.00	\$490.00	\$385.00	\$750.00		National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Gibson, Dunn & Crutcher	New York, NY	1086	\$1800.00	\$765.00	\$980.00	\$930.00	\$175.00	\$590.00					National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Gordon & Rees	San Francisco, CA	457	\$475.00	\$375.00	\$420.00	\$325.00	\$285.00	\$300.00					National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Greenberg Traurig	New York, NY	1699	\$955.00	\$360.00	\$655.00	\$595.00	\$200.00	\$390.00					National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Harris Beach	Rochester, NY	204	\$600.00	\$295.00	\$385.00	\$285.00	\$175.00	\$260.00	\$385.00	\$175.00	\$600.00		National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Harter Secrest & Emery	Rochester, NY	136	\$465.00	\$300.00	\$385.00	\$290.00	\$195.00	\$250.00	\$325.00	\$260.00	\$380.00		National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Haynes and Boone	Dallas, TX	489	\$1020.00	\$450.00	\$670.00	\$580.00	\$310.00	\$405.00	\$510.00	\$220.00	\$840.00		National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Hogan Lovells	Washington, DC	2280	\$1000.00	\$705.00	\$835.00								National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Holland & Hart	Denver, CO	409	\$725.00	\$295.00	\$435.00	\$415.00	\$165.00	\$275.00	\$360.00	\$185.00	\$595.00		National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.

#1417

2013	Holland & Knight	Washington, DC	926	\$1035.00	\$335.00	\$595.00	\$575.00	\$210.00	\$325.00	\$580.00	\$480.00	\$775.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Honigman Miller Schwartz and Cohn	Detroit, MI	227	\$560.00	\$290.00	\$390.00	\$225.00	\$205.00	\$220.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Hughes Hubbard & Reed	New York, NY	344	\$995.00	\$725.00	\$890.00	\$675.00	\$365.00	\$555.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Husch Blackwell	St. Louis, MO	514	\$925.00	\$235.00	\$430.00	\$465.00	\$190.00	\$260.00	\$395.00	\$230.00	\$600.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Ice Miller	Indianapolis, IN	301	\$530.00	\$335.00	\$450.00	\$305.00	\$245.00	\$270.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Irell & Manella	Los Angeles, CA	164	\$975.00	\$800.00	\$890.00	\$750.00	\$395.00	\$535.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Jackson Kelly	Charleston, WV	200	\$370.00	\$175.00	\$280.00	\$265.00	\$145.00	\$195.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Jackson Lewis	Los Angeles, CA	690	\$440.00	\$310.00	\$380.00	\$315.00	\$275.00	\$290.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Jackson Walker	Dallas, TX	328	\$550.00	\$450.00	\$500.00	\$385.00	\$255.00	\$335.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Jeffer, Mangels, Butler & Mitchell	Los Angeles, CA	126	\$875.00	\$560.00	\$690.00							National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Jenner & Block	Chicago, IL	432	\$925.00	\$565.00	\$745.00	\$550.00	\$380.00	\$465.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Jones Day	New York, NY	2363	\$975.00	\$445.00	\$745.00	\$775.00	\$205.00	\$435.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Jones Walker	New Orleans, LA	361	\$425.00	\$275.00	\$385.00	\$240.00	\$200.00	\$225.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.

#1418

2013	Kasowitz, Benson, Torres & Friedman	New York, NY	365	\$1195.00	\$600.00	\$835.00	\$625.00	\$200.00	\$340.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Katten Muchin Rosenman	Chicago, IL	586	\$745.00	\$500.00	\$615.00	\$595.00	\$340.00	\$455.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Kaye Scholer	New York, NY	414	\$1080.00	\$715.00	\$860.00	\$680.00	\$320.00	\$510.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Kelley Drye & Warren	New York, NY	298	\$815.00	\$435.00	\$640.00	\$600.00	\$305.00	\$430.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Kilpatrick Townsend & Stockton	Atlanta, GA	552	\$775.00	\$400.00	\$550.00	\$475.00	\$315.00	\$385.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	King & Spalding	Atlanta, GA	838	\$995.00	\$545.00	\$775.00	\$735.00	\$125.00	\$460.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Kirkland & Ellis	Chicago, IL	1517	\$995.00	\$590.00	\$825.00	\$715.00	\$235.00	\$540.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Knobbe, Martens, Olson & Bear	Irvine, CA	268	\$785.00	\$440.00	\$555.00	\$535.00	\$295.00	\$345.00	\$685.00	\$685.00	\$685.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Kramer Levin Naftalis & Frankel	New York, NY	320	\$1025.00	\$740.00	\$845.00	\$750.00	\$400.00	\$590.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Lane Powell	Seattle, WA	172	\$465.00	\$365.00	\$430.00	\$330.00	\$225.00	\$265.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Latham & Watkins	New York, NY	2033	\$1110.00	\$895.00	\$990.00	\$725.00	\$465.00	\$605.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Lathrop & Gage	Kansas City, MO	286	\$700.00	\$285.00	\$420.00	\$375.00	\$195.00	\$250.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Leonard, Street and Deinard	Minneapolis, MN	184	\$490.00	\$295.00	\$405.00	\$305.00	\$265.00	\$285.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.

#1419

2013	Lewis Roca Rothgerber			\$695.00	\$380.00	\$505.00	\$525.00	\$205.00	\$400.00				National Law Journal, December 2013	Location and Average FTE Attorneys' data not available due to merger in 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Lindquist & Venum	Minneapolis, MN	181	\$600.00	\$460.00	\$520.00	\$470.00	\$275.00	\$365.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Littler Mendelson	San Francisco, CA	909	\$615.00	\$395.00	\$550.00	\$420.00	\$245.00	\$290.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Lowenstein Sandler	Roseland, NJ	254	\$755.00	\$510.00	\$615.00	\$650.00	\$260.00	\$360.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Manatt, Phelps & Phillips	Los Angeles, CA	325	\$795.00	\$640.00	\$740.00							National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	McCarter & English	Newark, NJ	373	\$625.00	\$450.00	\$530.00	\$370.00	\$220.00	\$300.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	McDermott Will & Emery	Chicago, IL	1024	\$835.00	\$525.00	\$710.00							National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	McElroy, Deutsch, Mulvaney & Carpenter	Morristown, NJ	288	\$505.00	\$325.00	\$440.00	\$325.00	\$200.00	\$295.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	McGuireWoods	Richmond, VA	941	\$725.00	\$450.00	\$595.00	\$525.00	\$285.00	\$360.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	McKenna Long & Aldridge	Atlanta, GA	509	\$650.00	\$480.00	\$530.00	\$425.00	\$375.00	\$395.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Michael Best & Friedrich	Milwaukee, WI	198	\$650.00	\$260.00	\$445.00	\$350.00	\$190.00	\$275.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Miles & Stockbridge	Baltimore, MD	207	\$725.00	\$330.00	\$470.00	\$375.00	\$230.00	\$285.00	\$425.00	\$215.00	\$675.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Miller & Martin	Chattanooga, TN	133	\$585.00	\$245.00	\$385.00	\$270.00	\$180.00	\$215.00	\$355.00	\$210.00	\$440.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.

#1420

2013	Morgan, Lewis & Bockius	Philadelphia, PA	1334	\$765.00	\$430.00	\$620.00	\$585.00	\$270.00	\$390.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Morris, Manning & Martin	Atlanta, GA	142	\$575.00	\$400.00	\$480.00							National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Morrison & Foerster	San Francisco, CA	1010	\$1195.00	\$595.00	\$865.00	\$725.00	\$230.00	\$525.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Nixon Peabody	Boston, MA	612	\$850.00	\$295.00	\$520.00	\$550.00	\$180.00	\$300.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Norton Rose Fulbright			\$900.00	\$525.00	\$775.00	\$515.00	\$300.00	\$400.00				National Law Journal, December 2013	Location and Average FTE Attorneys' data not available due to merger in 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Nutter McClennen & Fish	Boston, MA	135	\$715.00	\$470.00	\$575.00	\$460.00	\$295.00	\$375.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	O'Melveny & Myers	Los Angeles, CA	738	\$950.00	\$615.00	\$715.00							National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Orrick, Herrington & Sutcliffe	San Francisco, CA	977	\$945.00	\$305.00	\$625.00	\$675.00	\$170.00	\$310.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Parker Poe Adams & Bernstein	Charlotte, NC	178	\$500.00	\$425.00	\$450.00							National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Patton Boggs	Washington, DC	485	\$780.00	\$490.00	\$665.00	\$475.00	\$325.00	\$405.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Paul Hastings	New York, NY	899	\$900.00	\$750.00	\$815.00	\$755.00	\$335.00	\$540.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Paul, Weiss, Rifkind, Wharton & Garrison	New York, NY	803	\$1120.00	\$760.00	\$1040.00	\$760.00	\$250.00	\$600.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Pepper Hamilton	Philadelphia, PA	493	\$850.00	\$475.00	\$630.00	\$460.00	\$245.00	\$360.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.

#1421

2013	Perkins Coie	Seattle, WA	823	\$940.00	\$320.00	\$600.00	\$595.00	\$215.00	\$405.00	\$565.00	\$270.00	\$790.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Pillsbury Winthrop Shaw Pittman	Washington, DC	609	\$1070.00	\$615.00	\$865.00	\$860.00	\$375.00	\$520.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Polinelli	Kansas City, MO	573	\$750.00	\$320.00	\$410.00	\$340.00	\$220.00	\$265.00	\$370.00	\$300.00	\$425.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Proskauer Rose	New York, NY	746	\$950.00	\$725.00	\$880.00	\$675.00	\$295.00	\$465.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Quarles & Brady	Milwaukee, WI	413	\$600.00	\$350.00	\$470.00	\$600.00	\$210.00	\$335.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Quinn Emanuel Urquhart & Sullivan	New York, NY	697	\$1075.00	\$810.00	\$915.00	\$675.00	\$320.00	\$410.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Reed Smith	Pittsburgh, PA	1468	\$945.00	\$545.00	\$710.00	\$530.00	\$295.00	\$420.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Richards, Layton & Finger	Wilmington, DE	138	\$850.00	\$475.00	\$660.00	\$450.00	\$250.00	\$350.00	\$465.00	\$450.00	\$475.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Riker Danzig Scherer Hyland & Perretti	Morristown, NJ	151	\$495.00	\$430.00	\$455.00	\$295.00	\$210.00	\$250.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Robinson & Cole	Hartford, CT	209	\$490.00	\$285.00	\$410.00							National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Rutan & Tucker	Costa Mesa, CA	139	\$675.00	\$345.00	\$490.00	\$500.00	\$230.00	\$320.00	\$490.00	\$435.00	\$575.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Saul Ewing	Philadelphia, PA	226	\$850.00	\$365.00	\$530.00	\$575.00	\$225.00	\$340.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Sedgwick	San Francisco, CA	347	\$615.00	\$305.00	\$425.00	\$475.00	\$250.00	\$325.00	\$450.00	\$350.00	\$660.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.

#1422

2013	Seward & Kissel	New York, NY	152	\$850.00	\$625.00	\$735.00	\$600.00	\$290.00	\$400.00					National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Seyfarth Shaw	Chicago, IL	753	\$860.00	\$375.00	\$610.00	\$505.00	\$225.00	\$365.00	\$470.00	\$245.00	\$800.00		National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Sheppard, Mullin, Richter & Hampton	Los Angeles, CA	521	\$875.00	\$490.00	\$685.00	\$535.00	\$275.00	\$415.00					National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Shumaker, Loop & Kendrick	Toledo, OH	226	\$585.00	\$295.00	\$405.00	\$335.00	\$175.00	\$260.00					National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Shutts & Bowen	Miami, FL	221	\$660.00	\$250.00	\$430.00	\$345.00	\$195.00	\$260.00					National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Skadden, Arps, Slate, Meagher & Flom	New York, NY	1735	\$1150.00	\$845.00	\$1035.00	\$845.00	\$340.00	\$620.00					National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Snell & Wilmer	Phoenix, AZ	422	\$695.00	\$295.00	\$495.00	\$420.00	\$185.00	\$280.00					National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Squire Sanders	Cleveland, OH	1257	\$950.00	\$350.00	\$655.00	\$530.00	\$250.00	\$355.00					National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Stevens & Lee	Reading, PA	167	\$800.00	\$525.00	\$625.00								National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Stinson Morrison Hecker	Kansas City, MO	280	\$695.00	\$290.00	\$475.00	\$650.00	\$185.00	\$280.00					National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Stoel Rives	Portland, OR	371	\$690.00	\$320.00	\$475.00	\$425.00	\$190.00	\$280.00	\$410.00	\$320.00	\$550.00		National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Strasburger & Price	Dallas, TX	208	\$770.00	\$225.00	\$420.00	\$450.00	\$215.00	\$260.00	\$445.00	\$225.00	\$600.00		National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Taft, Stettinius & Hollister	Cincinnati, OH	303	\$535.00	\$285.00	\$415.00	\$475.00	\$200.00	\$285.00					National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.

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2013	Thompson & Knight	Dallas, TX	281	\$740.00	\$425.00	\$535.00	\$610.00	\$240.00	\$370.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Thompson Coburn	St. Louis, MO	305	\$510.00	\$330.00	\$440.00	\$350.00	\$220.00	\$270.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Troutman Sanders	Atlanta, GA	575	\$975.00	\$400.00	\$620.00	\$570.00	\$245.00	\$340.00	\$510.00	\$325.00	\$675.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Ulmer & Berne	Cleveland, OH	178	\$415.00	\$315.00	\$380.00							National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Varnum	Grand Rapids, MI	134	\$465.00	\$290.00	\$390.00							National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Venable	Washington, DC	501	\$1075.00	\$470.00	\$660.00	\$575.00	\$295.00	\$430.00	\$565.00	\$435.00	\$810.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Vinson & Elkins	Houston, TX	677	\$770.00	\$475.00	\$600.00	\$565.00	\$275.00	\$390.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Waller Lansden Dortch & Davis	Nashville, TN	165	\$600.00	\$350.00	\$460.00	\$335.00	\$190.00	\$245.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Weil, Gotshal & Manges	New York, NY	1201	\$1075.00	\$625.00	\$930.00	\$790.00	\$300.00	\$600.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	White & Case	New York, NY	1900	\$1050.00	\$700.00	\$875.00	\$1050.00	\$220.00	\$525.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Wiley Rein	Washington, DC	272	\$950.00	\$550.00	\$665.00	\$535.00	\$320.00	\$445.00	\$580.00	\$380.00	\$800.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Williams Mullen	Richmond, VA	231	\$410.00	\$360.00	\$385.00	\$350.00	\$260.00	\$295.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Willkie Farr & Gallagher	New York, NY	540	\$1090.00	\$790.00	\$950.00	\$790.00	\$350.00	\$580.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.

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2013	Wilmer Cutler Pickering Hale and Dorr	Washington, DC	961	\$1250.00	\$735.00	\$905.00	\$695.00	\$75.00	\$290.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Winston & Strawn	Chicago, IL	842	\$995.00	\$650.00	\$800.00	\$590.00	\$425.00	\$520.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Wolff & Samson	West Orange, NJ	129	\$450.00	\$325.00	\$400.00	\$450.00	\$225.00	\$340.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Wyatt, Tarrant & Combs	Louisville, KY	165	\$500.00	\$280.00	\$418.00							National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.