

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

MICHAEL MUEHE, ELAINE HAMILTON,  
CRYSTAL EVANS, and COLLEEN  
FLANAGAN, on behalf of themselves and all  
others similarly situated,

Plaintiffs,

vs.

CITY OF BOSTON, a public entity,

Defendant.

Case No.: 1:21-cv-11080-RGS

**DECLARATION OF LINDA M. DARDARIAN IN SUPPORT OF  
PLAINTIFFS' MOTION FOR ATTORNEYS' FEES, COSTS, AND EXPENSES**

I, Linda M. Dardarian, hereby declare:

1. I am a member in good standing of the Bar of the State of California and a partner at the law firm of Goldstein Borgen Dardarian & Ho ("GBDH"), in Oakland, California. I am co-lead counsel for Plaintiffs and the proposed Class and am providing this declaration of counsel in support of Plaintiffs' Motion for Attorneys' Fees, Costs, and Expenses. I have personal knowledge of the facts set forth in this declaration and could and would testify competently to them.

2. In this Motion, Plaintiffs seek compensation for GBDH's time pursuant to the lodestar method under the fee-shifting provisions of the Americans with Disabilities Act ("ADA"), 42 U.S.C. § 12205, and Section 504 of the Rehabilitation Act ("Section 504"), 29 U.S.C. § 794a(b), as well as that of our co-counsel at Civil Rights Education and Enforcement Center ("CREEC") and Disability Law Center-Massachusetts ("DLC"). Accordingly, this Declaration proceeds as follows: it first summarizes GBDH's extensive expertise in resolving

systemic disability access violations and recounts the essential background of this case. It then describes GBDH's timekeeping practices and the reasonableness of the hours billed to this case, including each biller's background. Next, it discusses the reasonableness of the hourly rates we seek for our work in this case in light of our qualifications, billing rates for which we have been awarded attorneys' fees in this and other jurisdictions, and billing rates of comparable attorneys litigating in the Boston area. Finally, it describes the reasonable costs and expenses for which Plaintiffs seek reimbursement pursuant to the ADA and Section 504. A table that shows the breakdown of GBDH's lodestar by biller, time spent on the case through August 27, 2021, and hourly rate appears in paragraph 45, below.

**BACKGROUND AND EXPERIENCE OF  
GOLDSTEIN, BORGEN, DARDARIAN & HO**

3. GBDH is one of the oldest and most successful plaintiffs' public interest class action law firms in the country. Founded in Oakland, California in 1972, GBDH represents individuals against large companies and public entities in complex, class, and collective actions nationally in the firm's three primary practice areas: disability access, wage and hour violations, and employment discrimination. GBDH also represents plaintiffs in voting rights, consumer rights, and environmental justice cases. GBDH has long been recognized as one of the top plaintiffs' firms in the United States. In 1992, the *National Law Journal* ("A National Who's Who of the Top Lawyers in Employment Litigation") called the firm "[i]n a league of their own on the plaintiffs' side, handling the largest class actions nationwide." Every year since 2004, GBDH partners have been named "Northern California Super Lawyers" by their peers, in recognition of their outstanding legal achievements and high ethical standards. GBDH partners are rated "AV Preeminent" by Martindale Hubbell, indicating that our peers rank us at the highest level of professional excellence.

4. GBDH has been at the forefront of ensuring compliance with the Americans with Disabilities Act and obtaining access for persons with disabilities to the services, privileges, and advantages provided by public and private entities nationwide. GBDH has also successfully litigated and resolved a variety of cutting edge, complex and landmark employment and wage and hour cases against employers in many different industries, including insurance companies, grocery and retail stores, restaurant chains, and financial services companies. GBDH has won substantial back pay and other monetary relief for class members throughout the country and has obtained changes in employment and other policies and practices that were creating discriminatory barriers to equal employment opportunities and denying workers their lawful wages.

5. I am a 1987 graduate of Berkeley Law, at University of California, Berkeley. I have been a member of the California State Bar since 1987, and I am admitted to practice before the United States District Courts for the Northern, Central, and Eastern Districts of California, the United States Court of Appeals for the Ninth Circuit, and the United States Supreme Court. From September 1991 until December 1997, I was an associate at GBDH. I became a GBDH partner in January 1998 and the managing partner in 2016. Prior to joining GBDH, I worked at the law firms of Duane, Lyman & Seltzer and Carroll, Burdick & McDonough doing civil litigation.

6. Since joining GBDH in September 1991, I have been responsible for all facets of class action and other complex litigation, from pre-filing investigation through trial and appeal, and settlement. Since 1994, I have spent a large part of my practice representing people with mobility, hearing, and visual disabilities, both individually and in class or collective actions. I am also recognized as one of the innovators and leading practitioners of “Structured

Negotiation,” a cooperative model for resolving entrenched, systemic civil rights problems and other complex disputes. *See generally* Lainey Feingold, *Structured Negotiation: A Winning Alternative to Lawsuits* (2016).

7. I have been the lead or co-lead counsel in many significant class and complex actions obtaining systemic relief for persons with disabilities. For the past several years, members of my firm, particularly myself, partner Andrew P. Lee, associate Raymond Wendell, and paralegals Scott G. Grimes, Damon Valdez, and Stuart Kirkpatrick have represented people with mobility disabilities in a number of class actions involving access to large municipalities’ pedestrian rights of way, such that we have developed a significant amount of experience in that area.

8. Most recently, I and my firm, along with co-counsel, were appointed as class counsel in *Lashbrook v. City of San Jose*, No. 20-cv01236-NC (N.D. Cal.), *Hines v. City of Portland*, No. 3:18-cv-00869-HZ (D. Or.) and *Reynoldson v. City of Seattle*, No. 2:15-cv-01608-BJR (W.D. Wash.). *Lashbrook*, *Hines*, and *Reynoldson* involved classes of residents and visitors to the Cities of San Jose, Portland, and Seattle with mobility disabilities who had been denied access to the Cities’ pedestrian rights of way due to the lack of a curb ramp or a curb ramp that was damaged, in need of repair, or otherwise in a condition not suitable or sufficient for use. The claims alleged in the *Lashbrook*, *Hines*, and *Reynoldson* matters are very similar to those alleged by the Plaintiffs in the present action against the City of Boston.

9. The *Lashbrook* settlement received final approval in September 2020. *Lashbrook v. City of San Jose*, No. 20-cv-01236-NC, ECF No. 25 (N.D. Cal. Sept. 2, 2020). The *Lashbrook* settlement requires the City of San Jose to appropriate \$13 million dollars each fiscal year toward the construction and remediation of curb ramps until 2030. After 2030, San Jose is

required to appropriate a minimum of ten percent of its pavement budget toward the construction and remediation of curb ramps until it fulfills its obligations under the settlement. It ensures that San Jose will remediate all missing and noncompliant curb ramps by 2038. In approving the settlement, the court appointed GBDH and CREEC as Class Counsel and praised the settlement as “remarkable.”

10. The *Hines* settlement received final approval in September 2018. *Hines v. City of Portland*, No. 3:18-cv-00869-HZ, ECF No. 40 (D. Or. Sept. 27, 2018). The *Hines* settlement requires the City of Portland to construct or remediate 1,500 curb ramps per year, guaranteeing the construction or remediation of 18,000 curb ramps over a twelve-year period. The City of Portland will spend over \$100 million constructing and remediating curb ramps. As part of the approval of the settlement agreement, the court appointed GBDH and CREEC as Class Counsel.

11. The *Reynoldson* settlement received final approval in November 2017. *Reynoldson v. City of Seattle*, No. 2:15-cv-01608-BJR, ECF No. 61 (W.D. Wash. Nov. 1, 2017). The settlement agreement requires the City of Seattle to construct or remediate 1,250 curb ramps per year, guaranteeing the construction or remediation of 22,500 curb ramps over the course of the settlement period. The City of Seattle will spend nearly \$300 million constructing and remediating curb ramps. As part of the approval of the settlement agreement, the court appointed GBDH, CREEC, and other co-counsel as Class Counsel, and awarded Plaintiffs’ \$1,388,729 in attorneys’ fees, expenses and costs.

12. I and my firm were also certified class co-counsel in *Ochoa v. City of Long Beach*, a case on behalf of all persons with mobility disabilities who have been denied access to the City of Long Beach’s pedestrian right of way. Order Granting Plaintiffs’ Motion for Class Certification and Plaintiffs’ Amended Motion for Class Certification, *Ochoa v. City of Long*

*Beach*, No. 2:14-cv-04307-DSF-FFM, ECF No. 90 (C.D. Cal. Sept. 15, 2015). Plaintiffs in the *Ochoa* matter alleged that the City has unlawfully failed to make its pedestrian right of way, including curb ramps and sidewalks, accessible to persons with mobility impairments, in violation of Title II of the Americans with Disabilities Act, Section 504 of the Rehabilitation Act of 1973, and California Law. The claims alleged in the *Ochoa* matter are also very similar to those alleged in this action against the City of Boston. On October 17, 2017, the District Court for the Central District of California entered an order approving the *Ochoa* class action settlement. *Ochoa v. City of Long Beach*, No. 2:14-cv-04307-DSF-FFM, ECF No. 175 (Oct. 17, 2017). The settlement agreement requires the City of Long Beach to install 4,500 curb ramps within the first five years of the term of the agreement, spend up to \$50 million remediating curb ramps, and up to \$125 million remediating and maintaining other pedestrian facilities. Upon granting final approval of the settlement, the court awarded class counsel \$3.36 million in attorneys' fees, costs, and expenses.

13. Additionally, I and my firm, along with other co-counsel, were certified class counsel in *Willits v. City of Los Angeles*, No. CV 10-05782 CBM (MRW). *Willits* was brought on behalf of all persons with mobility disabilities who have been denied access to the City of Los Angeles's pedestrian right of way. Plaintiffs in the *Willits* matter sought injunctive relief, alleging that the City unlawfully failed to make its pedestrian right of way, including curb ramps and sidewalks, accessible to persons with mobility disabilities, in violation of Title II of the Americans with Disabilities Act, Section 504 of the Rehabilitation Act of 1973, and California Law. The claims alleged in the *Willits* matter, too, are very similar to those alleged in this action against the City of Boston. On January 3, 2011, the District Court certified a class of approximately 280,000 persons with mobility disabilities who live within the Los Angeles area,

and approved GBDH as class counsel. *See Willits v. City of Los Angeles*, No. CV 10-05782 CBM RZX, 2011 WL 7767305, at \*4-5 (C.D. Cal. Jan. 3, 2011).

14. Plaintiffs obtained final approval of the *Willits* class settlement in August 2016. *Willits v. City of Los Angeles*, No. CV 10-05782 CBM (MRW), ECF No. 415 (C.D. Cal. August 26, 2016). The *Willits* class settlement agreement requires the City of Los Angeles to fund significant access improvements to the City's pedestrian right of way over a thirty-year period and guarantees spending of more than \$1.4 billion in improvements to existing pedestrian facilities, as well as unlimited amounts on newly constructed and altered facilities. I was one of the lead negotiators of this settlement for the Plaintiffs. And, after years of extensive litigation and appeals, the court ordered the City of Los Angeles to pay class counsel approximately \$13 million in attorneys' fees, costs, and expenses.

15. I and my firm were certified class co-counsel in *Nevarez v. Forty Niner Football Company, LLC*, a case on behalf of persons with mobility disabilities and their companions who have been denied access to Levi's Stadium due to access barriers at the Stadium, its parking lots, the pedestrian right of way connecting the parking lots to the Stadium, and in the services and amenities offered at the Stadium. After contested class certification proceedings, the court certified injunctive relief classes comprised of persons with mobility disabilities and their companions, as well as a damages class comprised of persons with mobility disabilities seeking statutory damages pursuant to the California Unruh Civil Rights Act based, in part, on ADA predicate violations. *Nevarez v. Forty Niners Football Co., LLC*, 326 F.R.D. 562, 570 (N.D. Cal. 2018). The *Nevarez* action resulted in a class action settlement, approved by the Court in July 2020, that requires the defendants to remediate more than 2,000 physical access barriers within and around the Levi's Stadium, pay Class Counsel \$13,457,152.40 in attorneys' fees, expenses

and costs, and create a separate \$24 million settlement fund for compensating class members—the largest class damages settlement ever achieved in a case challenging physical access to a place of public accommodation. *Nevarez v. Forty Niners Football Co., LLC*, No. 5:16-cv-07013-LHK (SVK), ECF No. 392 (N.D. Cal. July 23, 2020).

16. I am also lead Class Counsel in the most significant class action to increase access to healthcare services for persons with mobility, visual, hearing and speech impairments, *Olson v. Sutter Health*, No. RG06-302354 (Alameda Superior Court), in which plaintiffs obtained a ten-year consent decree requiring Sutter Health to remove architectural barriers in all of its acute care and foundation facilities (clinics and doctor offices); install diagnostic and treatment medical equipment that is accessible to patients with mobility disabilities (*i.e.*, accessible examination chairs, tables, weight scales; and mammography equipment, as well as lift equipment); revise its policies and procedures to increase accessible patient care services; ensure that the websites and mobile applications for Sutter Health and all of its affiliates are accessible to individuals who are blind, low vision, deaf, hard of hearing, or have other disabilities, and to train medical staff to become more sensitive to the needs of patients and visitors with disabilities.

17. I have served as Class Counsel in other landmark disability access actions on behalf of people with mobility and other disabilities, including *Lane v. State of Tennessee*, No. 3:98-0731 (M.D. Tenn.). The *Lane* case enforced the rights of persons with mobility disabilities under the Americans with Disabilities Act and the United States Constitution to have access to the state courts in dozens of Tennessee counties by requiring architectural barrier removal and transfer of programs to accessible facilities. I also was co-class counsel in *Lieber, et al. v. Macy's West, Inc.*, No. C96-02955 MHP (N.D. Cal.) and *Camalo, et al. v. Macy's West, Inc.*, No. C98-2350 MHP (N.D. Cal.), brought under the Americans with Disabilities Act, California



Unruh Civil Rights Act, and the California Disabled Persons Act. Those consolidated cases resulted in a class settlement including systemic injunctive relief that required Macy's to remove architectural barriers at all Macy's stores in California and improve customer service for people with disabilities. It also created what was at that time the largest class damages funds in any disability rights public accommodation class action.

18. I have also focused much of my work over the past 27 years in Structured Negotiation to resolve systemic access barriers for individuals with disabilities. For example, I represented the plaintiff in a settlement negotiation with UCSF Medical Center that required the medical center to remove architectural barriers and install accessible medical equipment on behalf of patients with mobility disabilities. I have also negotiated landmark agreements for persons with visual impairments that provide talking pill bottles for pharmacy patients, alternative formats (including Braille, large print, electronic, and audio) for printed materials, accessible commercial websites, accessible point of sale machines, audio description of movie content at cinemas nationwide, and the installation of "talking ATMs" at all locations of major banks across the country. Such entities include American Cancer Society, American Express, Bank of America, BankOne/Chase, Best Buy, Caremark pharmacy, Cinemark Theaters, CVS/pharmacy, Equifax, Experian & TransUnion, E\*Trade, Kaiser Permanente, Major League Baseball Advanced Media, Radio Shack, Rite Aid, Safeway, 7-Eleven, Staples, Target, Trader Joe's, Walgreens, Wal-Mart, Wells Fargo Bank, and Wellpoint (Blue Cross), among others. I also negotiated for the installation of accessible (audible) pedestrian signals throughout San Francisco in *CCB v. City and County of San Francisco*.

19. During my years at GBDH, I have also litigated large non-disability class and complex actions, including *Bazerman v. American Airlines, Inc.*, No. 1:17-CV-11297-WGY (D.

Mass.), a class action filed in this District on behalf of American Airlines passengers who were charged to check a bag that should have been free. Attached hereto as Exhibit 1 is a true and correct copy of the order granting final approval and awarding attorneys' fees, costs, and expenses to the plaintiff in *Bazerman*. Attached hereto as Exhibit 2 is a true and correct copy of the transcript from the fairness hearing in *Bazerman*, in which the Honorable William G. Young praised our representation as "exemplary." Other notable class actions include *Munguia- Brown v. Equity Residential*, No. CV 16-01225-JSW-MEJ (N.D. Cal.) (certified class action on behalf of California tenants of Equity Residential properties who were charged fees for late payment of rent); *Balero, et al. v. Lumber Liquidators, Inc.*, No. CV 15-01005 JST (N.D. Cal.) (class action on behalf of California consumers who purchased laminate wood flooring products manufactured in China and sold by Lumber Liquidators, which Lumber Liquidators falsely advertised as compliant with California formaldehyde emission limits); *Center for Self-Improvement and Community Development v. Lennar Corporation, et al.*, No. CGC07-465738 (San Francisco Superior Court) (toxic tort action against Lennar for generating dust containing asbestos, hexavalent chromium, and other hazardous materials during construction of housing in Bayview Hunters Point); *Butler v. Countrywide Home Loans, Inc.*, No. BC 268250 (Los Angeles Superior Court) (\$30 million California class action on behalf of "account executives" seeking overtime, meal period compensation, recovery of unlawfully deducted wages and other monetary relief); *Lin v. Siebel Software Systems, Inc.*, No. CIV 435601 (San Mateo Superior Court) (\$27.5 million California class action on behalf of software engineers, seeking unpaid overtime wages); *San Francisco BayKeeper v. Dow Chemical Co.*, No. C97-01988 (Contra Costa County Superior Court) (Safe Drinking Water and Toxic Enforcement Act of 1986 action to protect Contra Costa County water supply from discharges of carcinogens and reproductive toxins); *Citizens for a*

*Better Environment v. Union Oil Co.*, No. C-94-0712 TEH (N.D. Cal.) (Clean Water Act citizens suit to limit refinery discharges of selenium into San Francisco Bay); *Shores v. Publix Super Markets*, No. 95-1162-CIV-T-25E (M.D. Fla.) (gender discrimination class action challenging defendant's job assignment, promotion, training and compensation practices, resulting in monetary relief of \$92 million and injunctive relief covering stores company-wide); *Butler v. Home Depot*, No. C-94-4335 SI (N.D. Cal.) (gender discrimination class action challenging defendant's job application, assignment, promotion, training and compensation practices, resulting in monetary relief of \$87.5 million and injunctive relief covering Home Depot's western region); *Pines, AARP, et al. v. State Farm General Ins. Co.*, SA CV 89-631 (C.D. Cal.) (nationwide ADEA collective action); *Stender v. Lucky Stores, Inc.*, C-88-1467 MHP (N.D. Cal.) (gender discrimination class action challenging initial job placement, allocation of hours, movement from part-time to full-time employment, and promotion); and *Kraszewski v. State Farm General Ins. Co.*, No. C 79-1261 TEH (N.D. Cal.) (statewide Title VII sex discrimination class action; settled for \$250 million).

20. In addition to my case work, I often lecture on disability rights, employment, litigation and class action issues, including making presentations at the Impact Fund Class Action Conference (2020), Jacobus tenBroek Disability Rights Symposium (2018), the Disability Rights Bar Association Annual Conference (2019, 2016-17, 2014, and 2012), the International Conference on Technology and Persons with Disabilities (regularly from 2012 to 2017), Law Seminars International, the American Bar Association (ABA), and the National Employment Lawyers Association (NELA) conventions. I have also taught at Stanford Law School's Advocacy Skills Workshop.

21. I have served as Executive Co-Editor of the Fourth Edition of Lindemann & Grossman, Employment Discrimination Law (2007), the leading treatise on employment discrimination law. I was also the Executive Co-Editor for the 2002, 2007 and 2008 Supplements. I received California Lawyer Magazine's California Lawyer of the Year ("CLAY") Award in 2014 for extraordinary achievement in Disability Rights. I have been designated as a "Super Lawyer" for Northern California every year since 2005, and one of Northern California Top 50 Women Lawyers in 2009. I am rated as an "AV Preeminent" attorney by Martindale Hubble and have been recognized as one of "The Best Lawyers in America" every year since 2010. I and my firm were named 2021 Elite Trial Lawyer Award finalists by the National Law Journal for our work in disability rights. In addition, I have received honors from the World Institute on Disability, the American Council of the Blind, and the American Foundation for the Blind for my work on behalf of individuals with disabilities. Until January 2021, I was the Vice Chair of the Board of Directors of the Disability Rights Bar Association, and I am a past Chair of the Board of Directors of Disability Rights Advocates.

#### **CASE BACKGROUND**

22. I have reviewed evidence from the City of Boston (the "City") that my firm and my co-counsel at CREEC and DLC (collectively, "Class Counsel") obtained through our investigations and negotiations in this case. This evidence demonstrates that inaccessible curb ramps, including those with surface gaps, excessively steep slopes, and other non-compliant features are widespread throughout the City's pedestrian right of way, and that thousands of corners are missing curb ramps altogether. These conditions similarly impede physical access to the pedestrian right of way for all of the City's residents and visitors who have mobility disabilities, including those who use wheelchairs, scooters and other assistive devices.

23. Specifically, the evidence we obtained showed that less than half of the City's 23,000 curb ramps were in compliance with applicable disability access standards. This figure does not include corners that are missing curb ramps altogether. Based on our extensive investigation of the City's pedestrian right of way, we estimated that at the commencement of this case, the City had at least 15,000 missing or noncompliant curb ramps. The Declaration of Tim Fox in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (ECF No. 14 at 4-5) elaborates further on our investigation of the City's pedestrian right of way.

24. On May 7, 2018, on behalf of our clients and a potential class of people with mobility disabilities who reside in or visit Boston, my colleagues at CREEC and DLC and I sent the City a letter detailing access barriers in the City's pedestrian right of way. The letter asserted that the City's failure to install and maintain adequate, compliant curb ramps violated the ADA and Section 504. It explained the City's obligations under these statutes and the ways in which the City was failing to meet these obligations. We proposed that the Parties work cooperatively to resolve their claims through structured negotiations rather than litigation. The City agreed, and in June 2018, the Parties entered into an agreement that tolled the statute of limitations on Plaintiffs' claims and identified issues to be addressed through structured negotiations.

25. Over the course of the next three years, the Parties negotiated vigorously. We exchanged extensive information regarding the status of existing curb ramps in the City's pedestrian right of way, the City's past and present policies concerning curb ramp construction and remediation, the City's legal obligations under the ADA and Section 504 (including the technical standards that apply to curb ramps), the City's existing system for receiving accessibility-related requests from residents, and the resources available to the City for constructing and remediating curb ramps.

26. The Parties discussed their settlement positions at length through dozens of telephone conferences held regularly throughout the three-year period, several in-person meetings, and many email exchanges. This investigation and information exchange have enabled Plaintiffs to understand the scope of the problem and evaluate the City's realistic capabilities. In addition, in June 2020, the City began a comprehensive survey of its curb ramps, which it is concluding this month. Because of the great complexity of both the curb ramp system and the efforts that will be required to bring it into compliance with the ADA and Section 504, this negotiation required a great deal of discussion with counsel and many City representatives over a long period of time.

27. The process of settling a case like this one is exponentially more complicated than settling a class action for primarily monetary relief. Rather than being negotiated chiefly by reference to the defendant's probable exposure at trial, here many additional factors influenced the Parties' bargaining positions with respect to each interdependent component of the Settlement. First and foremost, Class Counsel worked with the City to create a schedule by which the City would make a binding commitment to bring the City's curb ramps into full compliance with the ADA and Section 504. This schedule depended not just on Plaintiffs' showing that the current condition of the City's curb ramps violated these statutes, but on what was attainable for the City in light of budgetary concerns, the City's organizational structure, changes caused by the coronavirus pandemic, and the climate, terrain, and politics of Boston, among other considerations. Thus, while ambitious, the schedule is tailored to the City's unique circumstances: it accelerates over the term of the Consent Decree and builds in flexibility for unforeseen events or budgetary fluctuations. At the same time, it ensures accountability, with

monitoring, dispute resolution and Court enforcement mechanisms if the City fails to comply with the Decree's terms.

28. Moreover, many other components of the Settlement are necessary to give shape and force to the curb ramp construction schedule, such as the comprehensive curb ramp survey, the online request system, the technical specifications for curb ramps installed or remediated under the Consent Decree, the system for prioritizing certain locations, and Class Counsel's continuing right to monitor the City's compliance with the Consent Decree. Each of these provisions had to be separately negotiated.

29. The Parties reached a final agreement on all aspects of the settlement on June 30, 2021. The Proposed Consent Decree is attached in its entirety as Exhibit 2 to my Declaration in Support of Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement (ECF No. 12-2). Based on my extensive experience litigating and negotiating class actions that improve access to the pedestrian right of way for people with mobility disabilities, I believe that this is an excellent settlement. The requirement that the City install or remediate an average of 1,630 curb ramps per year compares quite favorably to the requirements set out in similar settlements. At the same time, based on information gained through investigating and negotiating this case, I believe that this commitment is realistic and attainable for the City.

30. It is difficult to attach a precise monetary value to the injunctive relief required under the Consent Decree. Under the Annual Commitment, the City must install or remediate an average of 1,630 curb ramps per year, unless it would otherwise achieve curb ramp saturation before the end of 2030 or it can show extreme impracticability, difficulty, or expense. Consent Decree § 5.1.4 (ECF No. 12-2 at 14). Based on our experience in similar cases, the average cost to a city like Boston to install a curb ramp is approximately \$7,500, with the range of costs

running from about \$4,000 on the low end to \$30-50,000 on the high end for very complicated corners. Consequently, the value of the curb ramp commitment provided by this Settlement is likely over \$100 million. In terms of achieving an increase over the level of work the City was performing prior to these negotiations, as explained by my co-counsel Tim Fox, immediately prior to our intervention, the City was constructing fewer than 800 curb ramps per year, on average. *See* Declaration of Timothy P. Fox in Support of Plaintiffs' Motion for Attorneys' Fees, Costs, and Expenses, filed herewith, ¶ 15. Assuming that the City was going to maintain that level of spending over the next two decades, of which there was no guarantee, it is likely that as a result of this Settlement the City will increase annual spending on curb ramp construction by at least \$6,225,000, for a total increase in spending of more than \$62 million over the term of the Consent Decree.

31. This figure underestimates the value of the Settlement, because it does not take into account the time and money the City will spend (or has already spent as a result of this Settlement): (1) conducting a comprehensive survey of its curb ramp system; (2) creating an "Implementation Plan" that takes into account the priorities set out in the Consent Decree; (3) maintaining a curb ramp request system accessible through its website or by telephone; (4) maintaining all compliant curb ramps in good condition; (5) addressing puddles of melted snow that interfere with access to curb ramps and other weather-related conditions; (6) employing an ADA Coordinator; (7) providing annual written reports so that Class Counsel can monitor the City's progress; and (8) resolving any disputes that might arise. Moreover, it does not take into account the Settlement's value for the many thousands of individuals with mobility disabilities who live in, work in, or visit Boston and will benefit from greatly improved access to the pedestrian right of way for years to come. It also does not take into account that as a result of the



Settlement the City is compelled by court order to install or remediate 1,630 ramps per year in compliance with the technical specifications under federal law. Under any estimate of the value of the Settlement, Plaintiffs' requested award of \$764,898.30 in attorneys' fees (exclusive of costs and expenses) represents a tiny fraction of the settlement's total benefit to Class Members.

### **REASONABLENESS OF REQUESTED HOURS**

32. Class Counsel have kept accurate, detailed, contemporaneous records of our time spent on this case. In all instances, the timekeeper indicates the date and amount of time spent on a task to one-tenth of an hour, describes the work that was performed during the indicated time period, and identifies the case to which the time should be charged. I reviewed my firm's billing records and applied billing judgment to eliminate or reduce entries that were excessive, unreasonably duplicative, inappropriate for the biller (such as clerical or administrative tasks billed by attorneys), insufficiently detailed, or otherwise erroneous or non-compensable. I deducted a few entries for multiple billers on conferences, leaving in the records for, at times, fewer billers or a single biller. I also deducted all time by certain billers who spent less than 15 hours on the case, even though their work was productive and essential to the successful resolution of this case. For example, I deleted the 7 hours spent on the case by my partner Andrew P. Lee, who has a deep background in the legal and technical requirements applicable to pedestrian right of way access for people with mobility disabilities and lent his expertise to help analyze proposed methodologies for the comprehensive curb ramp survey that the City is conducting under the settlement. A true and correct copy of the resulting billing records, after exercising billing judgment, is attached hereto as Exhibit 3.

33. My co-counsel Tim Fox from CREEC and Tom Murphy from DLC likewise applied billing judgment to their firms' billing records. All together, Class Counsel's exercises of billing judgment have resulted in an approximately 5.6% reduction from our original lodestar.

34. Through August 27, 2021, Class Counsel have devoted a total of 1,401 hours (after billing judgment) to investigating this case and negotiating, finalizing, and seeking the Court's approval of the Settlement. This figure also includes work spent on this Motion. For that work, Class Counsel seek a total lodestar of \$684,898.30.

35. We will continue to devote time to this case over the next two months until final approval of the settlement is granted and final judgment entered in the case. This will include time spent responding to the City's opposition to this Motion, which the City has the option to file; obtaining, analyzing and responding to the results of the comprehensive curb ramp survey, which we expect to receive on August 31, 2021; continuing to oversee the class notice process; responding to Class Member inquiries about the Settlement; drafting a motion for final approval of the Settlement; responding to any objections submitted by Class Members; and appearing at the Fairness Hearing. Class Counsel anticipate spending an additional estimated lodestar of \$80,000 on these tasks through the Effective Date of the Settlement. This estimate is based on our extensive experience finalizing class action settlements and litigating contested attorneys' fee petitions. Prior to the Fairness Hearing, we will supplement this Motion with our actual time records and lodestar for this work. Regardless of the amount of fees Class Counsel actually incur between August 28, 2021 and the Effective Date, we will not seek to recover more than the requested \$80,000 for that time, but will seek to recover our actual lodestar up to that amount.

36. As reflected in Class Counsel's contemporaneous billing records, to date, Class Counsel spent time: (1) conducting an extensive initial investigation into accessibility of the

City's curb ramp system, including through on-site inspections, client interviews, and analysis of public records; (2) preparing a detailed demand letter outlining Plaintiffs' claims; (3) entering into a structured negotiations agreement with the City; (4) engaging in dozens of sessions of detailed settlement discussions with the City over the course of three years; (5) exchanging extensive information and analysis regarding the City's policies and practices for construction, maintenance, and inspection in the public right of way, as well as budgetary materials, design documents, and existing data on the accessibility of the City's curb ramps; (6) providing expertise on technical specifications for curb ramps; (7) negotiating an initial term sheet; (8) negotiating every detail of the proposed Consent Decree; (9) prompting and facilitating the City's comprehensive curb ramp survey, including extensive discussions regarding the scope and sufficiency of data being collected; (10) preparing the Complaint and other filings to obtain the Court's approval of the Settlement; and (11) conferring with Named Plaintiffs throughout.

37. Class Counsel's staffing of this case was efficient and reasonable. CREEC, DLC, and GBDH shared the workload and made every effort to avoid unnecessary duplication of work, the vast majority of which was performed by four attorneys and a handful of other legal professionals. Each firm brought complementary areas of expertise to bear on a complex, technical case, all of which contributed to the excellent result achieved. In addition, the attorneys focused on work that was appropriate to their levels of experience and billing rates, with associates doing most of the drafting of pleadings and briefs, and paralegals performing time-consuming tasks like data collection and analysis. A summary of the roles fulfilled by GBDH's attorneys and staff on this case are as follows:

38. ***Linda M. Dardarian.*** I am a partner at GBDH with 34 years of experience, including an extensive background in complex disability access matters and Structured

Negotiations, as summarized in paragraphs 6 through 21, above. As the head of GBDH's disability rights practice, my work on this case focused on strategy, settlement negotiations, and high-level supervision of the GBDH legal team. I took lead on all negotiation sessions with the City and strategic direction and decision making during the years-long negotiation process, and was responsible for corresponding with the City on a day-to-day basis. I also reviewed and revised all written work product, including settlement correspondence, the initial term sheet, the Consent Decree, the Settlement Notice, the Complaint, Plaintiffs' Motion for Preliminary Approval of Class Action Settlement, Plaintiffs' Motion for Service Awards, and this Motion. As shown in the table in paragraph 45, I have spent 207.3 hours on this matter through August 27, 2021. At my requested hourly rate of \$795, this results in a lodestar of \$164,803.50.

39. **Raymond Wendell.** An associate at GBDH, Mr. Wendell graduated *cum laude* from Harvard Law School in 2013 and grew up in the Boston area. Prior to joining GBDH in 2014, he clerked for the Honorable Marilyn L. Huff in the United States District Court for the Southern District of California. During his time at GBDH, Mr. Wendell has been responsible for all facets of employment, disability, and consumer class actions and other complex litigation, from pre-filing investigation, discovery, and motion practice through class certification, trial, appeal, and/or settlement approval. Mr. Wendell has served as a member of class counsel on several systemic disability discrimination cases, including *Willits v. City of Los Angeles*, No. CV 10-05782 CBM (RZx) (C.D. Cal.), *Ochoa v. City of Long Beach*, No. 14-cv-04307-DSF (C.D. Cal.), and *Reynoldson v. City of Seattle*, No. 2:15-cv-01608-MJP (W.D. Wash.). Mr. Wendell was also class counsel in a case that was filed in this District, *Bazerman v. American Airlines, Inc.*, No. 1:17-CV-11297-WGY (D. Mass.). As mentioned above, in *Bazerman*, Judge Young praised Mr. Wendell's and the rest of the GBDH team's representation as "exemplary." See Ex.

2 at p. 11. In 2020, Mr. Wendell was selected as one of the nation's top lawyers under the age of 40 by Law360.

40. Mr. Wendell was responsible for drafting nearly all of the written work product in this case, including settlement correspondence, the initial term sheet, the Consent Decree, the Settlement Notice, Plaintiffs' Motion for Preliminary Approval of Class Action Settlement, this Motion, and several declarations. He participated in nearly all of the negotiation and co-counsel strategy sessions, which also provided context for his written work. He also conducted legal research and reviewed the work product of lower rate billers, including the Complaint. As shown in the table in paragraph 45, he has spent 363.0 hours on this matter through August 27, 2021. At his requested hourly rate of \$495, this results in a lodestar of \$179,685.00.

41. ***Katharine Fisher.*** An associate at GBDH, Ms. Fisher graduated from Berkeley Law School in 2015. Prior to joining GBDH, Ms. Fisher was a legal fellow in the Gender Equity & LGBT Rights and Work & Family Programs at the Legal Aid at Work (formerly Legal Aid Society – Employment Law Center). Ms. Fisher has litigated several class actions involving disability rights, consumer justice, and wage and hour violations. In this case, Ms. Fisher drafted Plaintiffs' Motion for Service Awards and worked with the Plaintiffs on their declarations in support of that motion. As shown in the table in paragraph 45, she has spent 20.2 hours on this matter through August 27, 2021. At her requested hourly rate of \$465, this results in a lodestar of \$9,393.00.

42. ***Scott Grimes.*** A senior paralegal and statistician with 32 years of case management and complex litigation experience, Mr. Grimes also has a master's degree in statistics. His work in this matter involved analyzing databases of the City's construction in the public right of way and access barriers in the City's curb ramp system, which helped the Parties

understand and appreciate the scope of the City's ADA and Section 504 violations. He also supervised distribution of the Settlement Notice and production of various filings, including Plaintiffs' Motion for Preliminary Approval of Class Action Settlement, Plaintiffs' Motion for Service Award, and this Motion. As shown in the table in paragraph 45, he has spent 93.4 hours on this matter through August 27, 2021. At his requested hourly rate of \$255, this results in a lodestar of \$23,817.00.

43. ***Damon Valdez***. A paralegal with approximately 28 years of litigation experience, Mr. Valdez's primary duties in this matter involved identifying and tracking ADA and Section 504 violations in the City's curb ramp system. As shown in the table in paragraph 45, he has spent 110.9 hours on this matter through August 27, 2021. At his requested hourly rate of \$225, this results in a lodestar of \$24,952.50.

44. ***Stuart Kirkpatrick***. A paralegal with nine years of litigation experience, Mr. Kirkpatrick's primary duties in this matter included identifying and tracking ADA and Section 504 violations in the City's curb ramp system, reviewing documents regarding the City's construction in the public right of way and access barriers in the City's curb ramp system, helping distribute the Settlement Notice, and assisting with numerous court filings, including Plaintiffs' Motion for Preliminary Approval of Class Action Settlement, Plaintiffs' Motion for Service Award, and this Motion. As shown in the table in paragraph 45, he has spent 203.9 hours on this matter through August 27, 2021. At his requested hourly rate of \$225, this results in a lodestar of \$45,877.50.

45. In summary, the following table shows the amount of time spent on this matter by GBDH timekeepers through August 27, 2021 (totaling 998.7 hours), multiplied by their requested hourly rates, and the resulting total lodestar:

Name	Position	Years of Experience/ Grad. Year	Hours	Requested Rate	Total
Linda M. Dardarian	Partner	34 years/1987	207.30	\$795	\$164,803.50
Raymond Wendell	Associate	8 years/2013	363.00	\$495	\$179,685.00
Katharine Fisher	Associate	6 years/2015	20.20	\$465	\$9,393.00
Scott G. Grimes	Senior Paralegal	32 years	93.40	\$255	\$23,817.00
Damon Valdez	Paralegal	29 years	110.90	\$225	\$24,952.50
Stuart Kirkpatrick	Paralegal	9 years	203.90	\$225	\$45,877.50
<b>GBDH's Total Lodestar</b>					<b>\$448,528.50</b>

A table showing the amount of time spent on this matter by all of the timekeepers for GBDH, CREEC and DLC through August 27, 2021, their requested hourly rates, and the resulting total lodestar is attached hereto as Exhibit 11.

#### **REASONABLENESS OF REQUESTED RATES**

46. As set out in paragraphs 38 through 44 above, my colleagues at GBDH and I have extensive expertise in multiple areas relevant to this lawsuit. In light of our credentials and the complexity of this matter, our work merits compensation at the higher end of the market.

47. GBDH periodically (typically on an annual basis) establishes hourly rates for the firm's billing personnel. GBDH establishes those rates based on the prevailing market rates for attorneys and law firms in the San Francisco Bay Area that have attorneys and staff of comparable skill, experience, and qualifications. Those rates are charged to defendants with whom we have settlement agreements that require monitoring, and those defendants pay us by the hour on a regular billing basis, much like a paying client. They are also the rates that we presumptively claim in our fee applications in all of our contingent, fee-shifting cases, and they

are the rates that are typically awarded to us for complex litigation in California. For this case's billers, our rates for the year 2020 that were approved by state and federal courts are as follows: \$945 for me, \$490 for Raymond Wendell, \$465 for Katharine Fisher, \$350 for Scott Grimes, and \$285-325 for other paralegals. Our regular 2021 rates have increased since then.

48. For example, in *Artie Lashbrook v. City of San Jose*, No. 5:20-cv-01236-NC, ECF No. 25 (N.D. Cal. Sept. 2, 2020), the court approved as reasonable GBDH's 2020 hourly rates, ruling that they were "within the market range of hourly rates charged by attorneys of comparable experience, reputation, and ability for similar litigation." Those rates were as follows: \$945 for me, \$325 for Scott Grimes, and \$285 for Stuart Kirkpatrick. Attached hereto as Exhibit 4 is a true and correct copy of the order granting final approval and awarding attorneys' fees, costs, and expenses to the plaintiff in *Lashbrook*.

49. Additionally, on July 23, 2020, as class counsel in *Abdul Nevarez et al. v. Forty Niners Football Company, LLC, et al.*, No. 5:16-cv-07013-LHK, ECF No. 416 (N.D. Cal. Jul. 23, 2020), GBDH was awarded our full lodestar, adjusted by an upward multiplier of 1.124, based on our 2019 hourly rates, which were as follows: \$925 for me, \$475 for Raymond Wendell, \$450 for Katharine Fisher, \$325 for Scott Grimes, \$295 for Damon Valdez, and \$275 for Stuart Kirkpatrick. Attached hereto as Exhibit 5 is a true and correct copy of the order granting final approval and awarding attorneys' fees, costs, and expenses to the plaintiffs in *Nevarez*.

50. Even though this case is filed in the District of Massachusetts, I believe we would be justified in seeking attorneys' fees based on our regular, Bay Area rates. We are uniquely qualified to resolve complex disputes regarding disability access, particularly with regard to the pedestrian right of way. *See, e.g., Arbor Hill Concerned Citizens Neighborhood Ass'n v. Cnty. of*



*Albany and Albany Cnty. Bd. of Elections*, 522 F.3d 182, 191 (2d Cir. 2008). Instead, we are taking a more conservative approach by requesting significantly reduced rates for most of our billers that we calculated by reference to prevailing rates in the Boston legal market.

51. Our starting point for reducing our rates was a prior class action settlement in which we were awarded fees by a court in the District of Massachusetts in early 2019: *Max Bazerman v. American Airlines, Inc.*, No. 1:17-CV-11297-WGY, ECF No. 104 (D. Mass. Apr. 8, 2019). In *Bazerman*, the court awarded our full lodestar, adjusted by an upward multiplier of 1.157. The rates we used to calculate our lodestar were as follows: \$740 for me, \$450 for Raymond Wendell, \$235 for senior paralegal Scott Grimes, and \$210 for experienced paralegals.

52. As is standard in the legal market, we increase our rates every year to reflect simple inflation and other market changes. For this case, we identified appropriate hourly rates by adjusting our *Bazerman* hourly rates by the rate of increase of the consumer price index published by the United States Bureau of Labor Statistics between January 2019 (when the plaintiff in *Bazerman* filed his motion for attorneys' fees) and July 2021.<sup>1</sup> From there, we adjusted upward or downward by \$5 to \$10, yielding the following hourly rates: \$795 for me, \$495 for Raymond Wendell, \$255 for Scott Grimes, and \$225 for Damon Valdez and Stuart Kirkpatrick. The \$465 rate for Katharine Fisher was set in proportion with these, based on her experience.

53. The rates that we requested in *Bazerman*, which formed the basis of the attorneys' fee that the court approved, were based on the then-current edition of the *Real Rate Report Snapshot* published by Wolters Kluwer. Accordingly, in setting GBDH's requested rates for this

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<sup>1</sup> See United States Bureau of Labor Statistics, CPI Inflation Calculator, [bls.gov/data/inflation\\_calculator.htm](https://bls.gov/data/inflation_calculator.htm).

case, I referred to the 2020 version of the *Real Rate Report Snapshot* (“2020 Real Rate Report”), which is the most up-to-date version currently available. We often use this report because it is based on a large dataset reflecting actual hourly rates paid to billing attorneys and paralegals, including over 500 litigation attorneys in the Boston area. The *2020 Real Rate Report* provides data on 2019 billing rates for the first quartile, median, and third quartile, broken down by market, litigation or non-litigation practice, partner or associate status, and practice area. A true and correct copy of relevant excerpts from the *2020 Real Rate Report* is attached hereto as Exhibit 6.

54. One limitation of the *2020 Real Rate Report* is that none of the highlighted practice areas correspond to the complex class action practice that my firm maintains. As a result, I relied on the data reflecting billing rates for Boston litigation attorneys across practice areas, which has a sample size of over 500 attorneys. In *Bazerman*, GBDH’s billing rates were based on the third-quartile figures from the then-applicable version of this chart. Here, the rates we are requesting are squarely between the median and third-quartile figures for Boston litigation attorneys across practice areas according to the *2020 Real Rate Report*. I believe that this is a quite reasonable comparison based on my firm’s skill, experience, and expertise in class actions, disability access, and pedestrian right of way issues and the quality of the representation in this case. The data that I relied on can be found on page 20 of the *2020 Real Rate Report* and is reprinted below for the Court’s convenience. Because the *2020 Real Rate Report* is based on data from 2019, I have calculated inflation-adjusted values by reference to the increase in the consumer price index between June 2019 and July 2021. The inflation-adjusted values appear in italics and bold font adjacent to the Real Rate Report’s 2019 figures.

**Hourly Rates for Litigation Attorneys in Boston in 2019, 2021 (Adjusted for Inflation)**

Position	First Quartile	Median	Third Quartile
Partner	\$410 / <b>\$436</b>	\$650 / <b>\$693</b>	\$833 / <b>\$888</b>
Associate	\$325 / <b>\$346</b>	\$425 / <b>\$453</b>	\$587 / <b>\$626</b>

55. As this chart from the *2020 Real Rate Report* shows, the hourly rates that GBDH is requesting in this case (\$795 for senior partner and \$465 to \$495 for associates) fall squarely between the median and third-quartile figures for litigation attorneys in Boston. The *2020 Real Rate Report* therefore confirms that the requested rates are reasonable.

56. Although the *2020 Real Rate Report* does not contain data specific to Boston-area paralegals, it contains nationwide data. According to a chart appearing on page 10, the billing rate for the first quartile of paralegals in 2019 was \$150; for the median, \$213; and for the third quartile, \$289. Adjusted for inflation, the billing rate for the first quartile of paralegals would be \$160; for the median, \$227; and for the third quartile, \$308. The rates we are requesting for GBDH's highly experienced paralegals (\$225 to \$255) are therefore between the median and the third quartile for paralegals nationwide.

57. Recent awards of attorneys' fees ordered in complex and class cases filed in federal and state courts in Massachusetts further confirm that our requested rates are reasonable. For instance, *Crane v. Sexy Hair Concepts, LLC*, No. 17-cv-10300-FDS, 2019 WL 2137136, at \*2 (D. Mass. May 14, 2019) was a class action alleging unfair and deceptive trade practices under Massachusetts law. The court ordered an award of attorneys' fees that exceeded class counsel's lodestar. *Id.* Class counsel, a Boston-based plaintiffs' firm, based its lodestar calculation on hourly rates ranging from \$720 to \$925 for partners, from \$350 to \$575 for associates, and \$225 for all paralegals. Adjusted for inflation, those rates are equivalent to

hourly rates ranging from \$778 to \$999 for partners, from \$378 to \$621 for associates, and \$243 for all paralegals. Attached hereto as Exhibit 7 is a true and correct copy of the declaration of counsel setting out the hourly rates used to calculate the lodestar, which my staff downloaded from PACER.

58. *NPS LLC v. Ambac Assurance Corp.*, 190 F. Supp. 3d 212, 220-24 (D. Mass. 2016) was a complex commercial action. The court awarded hourly rates ranging from \$657 to \$742 for partners and from \$329 to \$491 for associates. Adjusted for inflation, those rates are equivalent to hourly rates ranging from \$744 and \$840 for partners and from \$373 and \$556 for associates.

59. In my professional judgment and based on my decades of experience litigating and resolving complex civil rights disputes, the extensive injunctive relief required under the Consent Decree represents a truly outstanding result for the Class. In light of the excellent outcome, Plaintiffs could justifiably request an upward adjustment of the lodestar. *See, e.g., New England Carpenters Health Benefits Fund v. First Databank, Inc.*, No. 05-CV-11148-PBS, 2009 WL 2408560, at \*2 (D. Mass. Aug. 3, 2009). However, we have opted not to request an upward multiplier and instead only seek an award of our full lodestar.

#### **REASONABLENESS OF COSTS AND EXPENSES**

60. GBDH is seeking reimbursement of its reasonable out-of-pocket costs and expenses incurred in this matter pursuant to the ADA and Section 504. *See* 42 U.S.C. § 12205; 29 U.S.C. § 794a(b).

61. The items we have included in our costs and expenses are billed separately and are not included in my firm's lodestar. For accounting purposes and to ensure that all costs and expenses are accurately assigned to the appropriate case, it is my firm's practice to assign a unique billing code for each case that we investigate, litigate, or negotiate. This case had a

unique billing code, and all expense records, receipts, and billing statements reflecting costs and expenses associated with this case were assigned to that billing code.

62. My firm's total costs and expenses in this matter through August 27, 2021 come to \$2,044.54. Those costs include in-house copying and printing, telephone charges, electronic legal research, and travel expenses. GBDH paid these costs and expenses on a regular and timely basis as they were incurred. All of these costs and expenses have been necessarily and reasonably incurred. A table accurately summarizing these costs and expenses, followed by an itemization of the costs and expenses, is attached hereto as Exhibit 8.

63. Based on my extensive experience obtaining final approval of class action settlements in various courts, I anticipate that, if the Court sets the hearings on this motion and the motion for final approval of the settlement to take place in person, Class Counsel will incur approximately \$10,000 in additional costs and expenses between today and the Fairness Hearing, bringing Class Counsel's anticipated total for the case to \$14,973.48 (\$2,044.54 for GBDH, \$2,226.94 for CREEC, \$702.00 for DLC, plus anticipated cap of \$10,000). If the Court sets the hearing to take place virtually, these future costs will be significantly lower. Prior to the fairness hearing, Class Counsel will supplement this Motion with our actual cost figures for this time period.

64. Attached hereto as Exhibit 9 is a true and correct copy of the order granting final approval and awarding attorneys' fees, costs, and expenses, and service awards of \$5,000 to each of the plaintiffs in *Hines v. City of Portland*, No. 3:18-cv-00869-HZ, ECF No. 40 (D. Or. Sept. 27, 2018).

65. Attached hereto as Exhibit 10 is a true and correct copy of the order granting service awards of \$5,000 to each of the plaintiffs in *Reynoldson v. City of Seattle*, No. 2:15-cv-01608-BJR, ECF No. 60 (W.D. Wash. Nov. 1, 2017).

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct, and that this Declaration was executed this 30th day of August, 2021, in Oakland, California.



Linda M. Dardarian

*Attorneys for Plaintiff and the proposed Settlement Class*

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (“NEF”) and paper copies will be sent to those indicated on the NEF as non-registered participants on August 30, 2021.

*/s/ Raymond Wendell*  
Raymond Wendell

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# **EXHIBIT 1**



IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

MAX BAZERMAN, individually and on  
behalf of others similarly situated,

Plaintiff,

vs.

AMERICAN AIRLINES, INC., a  
Delaware Corporation,

Defendant.

Case No.: 1:17-CV-11297-WGY

~~PROPOSED~~ <sup>4/14</sup> FINAL ORDER APPROVING CLASS  
ACTION SETTLEMENT AND ENTERING FINAL JUDGMENT

This motion for final approval, having been brought before the Court jointly by the Parties, the Parties having entered into a settlement agreement with attached exhibits (collectively, the “Settlement”), signed and filed with this Court on June 7, 2018, to settle *Bazerman v. American Airlines, Inc.*, Case No. 1:17-cv-11297-WGY (the “Action”); and

The Court, having entered an Order dated June 22, 2018 (ECF No. 65, the “Preliminary Approval Order”) preliminarily certifying the putative class in this action for settlement purposes only under Fed. R. Civ. P. 23(a) and (b)(3), ordering individual notice to members of the Settlement Class, scheduling a Fairness Hearing for December 17, 2018 (later rescheduled to April 4, 2019) that provides potential members of the Settlement Class with an opportunity either to exclude themselves from the Settlement Class or to object to the proposed settlement, and issuing related Orders; and the Court, having held a Fairness Hearing on April 4, 2019 to determine whether to grant final approval of the proposed settlement and issue related relief; and

The Court, having considered the papers submitted by the Parties and by all other persons who timely submitted papers in accordance with the Preliminary Approval Order, and having

heard oral presentations by the Parties and all persons who complied with the Preliminary Approval Order, and based on all of the foregoing, together with this Court's familiarity with the Action, it is hereby **ORDERED, ADJUDGED, AND DECREED** as follows:

1. This Final Order Approving Class Action Settlement incorporates and makes a part hereof: (a) the Settlement, including all exhibits thereto, and definitions included therein, which was signed and filed with this Court on June 7, 2018; (b) the briefs, affidavits, and other materials filed in support of the settlement, Service Awards, and Class Counsel's request for an award of attorneys' fees and reimbursement of expenses and costs; (c) the record at the Fairness Hearing; (d) the documents listed on the docket sheet or otherwise submitted to the Court; and (e) all prior proceedings in the Action. All terms used herein, unless otherwise defined, shall have the same meanings as set forth in the Settlement.

2. Because due, adequate, and the best practicable notice has been disseminated and all Settlement Class Members have been given the opportunity to exclude themselves from or object to this class action settlement, the Court has personal jurisdiction over all Settlement Class Members. The Court has subject-matter jurisdiction over the claims asserted in the complaint and/or the Action pursuant to 28 U.S.C. §§ 1332 and 1367, including, without limitation, jurisdiction to approve the proposed settlement and the Settlement, grant final certification to the Settlement Class, dismiss the Action on the merits and with prejudice, and issue related orders. The Court finds that venue is proper in this district pursuant to 28 U.S.C. § 1391.

3. The Class preliminarily certified by this Court is hereby finally certified for settlement purposes only under Fed. R. Civ. P. 23(a) and (b)(3), the Court finding that the

Settlement Class fully satisfies all the applicable requirements for Fed. R. Civ. P. 23 and due process. The Settlement Class shall consist of, collectively:

All residents of the United States (including the fifty states, the District of Columbia, the U.S. Virgin Islands, and Puerto Rico) who:

- a. traveled on American Airlines (“American”),
- b. at any time between July 13, 2013 and the Settlement Date (the “Class Period”), and
- c. meets the criteria of either or both subsections (1) and (2) below:
  - (1) were charged a checked bag fee inconsistently with statements in American’s Baggage Policy that passengers may check one or more bags for no additional charge, excluding oversized and overweight checked bags, specialty items, and sports equipment, for any of the following reasons:
    - i. At the time of check-in, the passenger held a First or Business Class ticket for a domestic flight;
    - ii. At the time of check-in, the passenger held a Business Class ticket for an international flight;
    - iii. At the time of check-in, the passenger held AAdvantage elite status with American or an equivalent frequent flyer elite status with a partner airline, or traveled on the same itinerary as a passenger who held such status;
    - iv. At the time of check-in, the passenger was an active U.S. Military member or the dependent of a U.S. Military member travelling on orders;
    - v. At the time of check-in, the passenger was an active U.S. Military member on personal travel.
  - (2) were charged a checked bag fee inconsistently with a Confirmation Email received by the passenger stating eligibility to check a first bag for that ticketed trip at no additional charge.

Specifically excluded from the Settlement Class are the following Persons: (1) American and its respective parents, subsidiaries, divisions, affiliates, associated entities, business units, predecessors in interest, successors, successors in interest and representatives and each of their respective immediate family members; (2) Class Counsel; and (3) the judges who have presided over the Litigation and any related cases.

4. The Court finds that only those individuals specifically listed in Exhibit D to the Declaration of Steven J. Giannotti and filed with the Court, and no other member of the Settlement Class, have submitted timely and valid Opt-Out requests and are therefore not bound by this Final Order and Judgment. Attached hereto as Exhibit A is the list of individuals who submitted timely and valid Opt-Out requests and are therefore neither permitted to share in the benefits nor bound by this Final Order and Judgment, except for Opt-Outs who subsequently elected to submit Claim Forms before the Claim Deadline. All other Settlement Class Members are bound by the terms and conditions of the Settlement and this Final Order and Judgment.

5. Plaintiff Max Bazerman has adequately represented the Settlement Class for purposes of entering into and implementing the Settlement. Linda M. Dardarian, Byron Goldstein, and Raymond Wendell of Goldstein, Borgen, Dardarian & Ho; and Benjamin Edelman of Law Offices of Benjamin Edelman, are experienced and adequate Class Counsel. Plaintiff and Class Counsel have satisfied the requirements of Fed. R. Civ. P. 23(a)(4) and 23(g) and are hereby appointed as Class Representatives.

6. The Court finds that the dissemination of the Class Notice, the establishment of a website containing settlement-related materials, the establishment of a toll-free telephone number, and all other notice methods set forth in the Settlement and the Declaration of the Settlement Administrator, and the notice dissemination methodology implemented pursuant to

the Settlement and this Court's Preliminary Approval Order, as described in the Declaration of Steven J. Giannotti, which is hereby incorporated herein and made a part hereof:

a. constituted the best practicable notice to members of the Settlement Class under the circumstances of the Action;

b. constituted notice that was reasonably calculated, under the circumstances, to apprise the Settlement Class of the pendency of the Action, of their right to object to or exclude themselves from the proposed Settlement, of their right to appear at the Fairness Hearing, and of their right to obtain monetary relief from this Settlement;

c. constituted reasonable, due, adequate and sufficient notice to all Persons entitled to receive notice; and

d. constituted notice that met all applicable requirements of the Federal Rules of Civil Procedure, 28 U.S.C. § 1715, the Due Process Clause of the United States Constitution, and any other applicable law, as well as complied with the Federal Judicial Center's illustrative class action notices.

7. The Court finds that the Claim Form that was distributed to the Settlement Class met all applicable requirements of the Federal Rules of Civil Procedure, 28 U.S.C. § 1715, the Due Process Clause of the United States Constitution, and any other applicable law.

8. The terms and provisions of the Settlement have been entered into in good faith and are hereby fully and finally approved as fair, reasonable, and adequate as to, and in the best interests of, each of the Parties and the Settlement Class Members, and in full compliance with all applicable requirements of the Federal Rules of Civil Procedure, the Class Action Fairness Act of 2005, Pub. L. 109-2, Stat. 4, the United States Constitution (including the Due Process Clause), and any other applicable law. The Settlement is approved. No objections to the

Settlement have been made. The Parties are hereby directed to implement and consummate the Settlement according to its terms and provisions. Class Counsel and Defendant shall take all steps necessary and appropriate to provide Settlement Class Members with the benefits to which they are entitled under the terms of the Settlement.

9. The terms of the Settlement and of this Final Order and Judgment shall be forever binding on Plaintiffs, Defendant, and all Settlement Class Members, as well as their respective present, former, and future administrators, agents, assigns, attorneys, executors, heirs, partners, predecessors-in-interest and successors, and those terms shall have *res judicata* and other preclusive effect in all pending and future claims, lawsuits, or other proceedings maintained by or on behalf of any such persons, to the extent those claims, lawsuits, or other proceedings involve matters that are encompassed by the Release.

10. The Release, which is set forth in Section XII of the Settlement, is expressly incorporated herein in all respects, including all defined terms used therein, is effective as of the date of this Final Order and Judgment, and forever discharges the Released Parties from any claims or liabilities based on the Released Claims. Plaintiff and all Settlement Class Members have conclusively compromised, settled, dismissed, and released any and all Released Claims against Defendant and the Released Persons. Plaintiff and all Settlement Class Members, whether or not they have returned a Claim Form within the time and in the manner provided for, are barred from asserting any Released Claims against Defendant and/or any Released Persons.

11. All Settlement Class Members and/or their representatives, and all persons acting on their behalf (including but not limited to the Releasing Parties), who have not been timely excluded from the Settlement Class are hereby permanently barred and enjoined from (1) filing, commencing, prosecuting, intervening in or participating (as class members or otherwise) in any

other lawsuit or administrative, regulatory, arbitration or other proceeding in any jurisdiction based on the Released Claims; and (2) organizing Settlement Class Members into a separate class for purposes of pursuing as a purported class action any lawsuit or arbitration or other proceeding (including by seeking to amend a pending complaint to include class allegations or seeking class certification in a pending action) based on the Released Claims, except that Settlement Class Members are not precluded from participating in any investigation or suit initiated by a state or federal agency. All Settlement Class Members and all persons in active concert or participation with Settlement Class Members, including all persons acting on their behalf (including but not limited to the Releasing Parties), are permanently barred and enjoined from organizing or soliciting the participation of any members of the Settlement Class who did not timely exclude themselves from the Settlement Class into a separate class or group for purposes of pursuing a putative class action, any claim, or lawsuit in any jurisdiction that is covered by the Release. Pursuant to 28 U.S.C. §§ 1651(a) and 2283, the Court finds that issuance of this permanent injunction is necessary and appropriate in aid of the Court's continuing jurisdiction and authority over the Action.

12. Nothing in this Final Order and Judgment shall preclude any action to enforce the terms of the Settlement, including those relating to participation in any of the processes detailed in the Settlement.

13. Nothing in this Final Order and Judgment shall preclude the Parties, without further approval from the Court, to agree to and adopt such amendments, modifications, and expansions of the Settlement and all exhibits thereto as (1) shall be consistent in all material respects with this Final Order and Judgment; and (2) do not limit the rights of the Parties or Settlement Class Members.

14. Class Counsel are hereby awarded attorneys' fees and reimbursement of their costs and expenses in the amount of at least \$2,250,000, which amount is approved as fair and reasonable, pursuant to Fed. R. Civ. P. 23(h) and is in accordance with the terms of the Settlement. The Court finds that the above stated award of attorneys' fees is fair and reasonable in consideration of, among other things, the efforts of Class Counsel and the settlement they achieved for the Settlement Class, and that the amount of costs and expenses is reasonable and was reasonably incurred in the course of the litigation. Class Counsel, in their discretion, shall allocate and distribute this award of attorneys' fees and expenses among Plaintiff's Counsel. Defendant's objections to Class Counsel's request for an award of attorneys' fees and reimbursement of costs and expenses are hereby overruled.

15. The Court will consider whether to award Class Counsel up to an additional \$500,000 in attorneys' fees, costs, and expenses. The Parties have thirty days from the issuance of this Order to submit optional further briefing in support of or opposition to such additional sum.

16. The Court hereby awards \$2,500 to Plaintiff Max Bazerman as a service award in his capacity as a Plaintiff and Class Representative in this Action. The Plaintiff's individual Release, as described in Section XII of the Settlement, is deemed effective and binding on Plaintiff as of the Effective Date.

17. The preceding three paragraphs of this Final Order cover, without limitation, any and all claims against the Released Parties for attorneys' fees, expenses and costs incurred by Plaintiff and Class Counsel in connection with the Action, the settlement of the Action, the administration of such settlement, and/or the Release, except to the extent otherwise specified in this Final Order and Judgment and the Settlement.



18. The Court has jurisdiction to enter this Final Order and Judgment. Without in any way affecting the finality of this Final Order and Final Judgment, this Court expressly retains jurisdiction as to all matters relating to the administration, consummation, enforcement, and interpretation of the Settlement and of this Final Order and Judgment, and for any other necessary purpose, including, without limitation:

a. enforcing the terms and conditions of the Settlement and resolving any disputes, claims, or causes of action that, in whole or in part, are related to or arise out of the Settlement or this Final Order and Judgment (including, without limitation, whether a person or entity is or is not a Settlement Class Member and whether claims or causes of action allegedly related to this case are or are not barred by this Final Order and Judgment; and whether persons or entities are enjoined from pursuing any Released Claims against Defendant);

b. entering such additional Orders as may be necessary or appropriate to protect or effectuate this Final Order and Judgment and the Settlement (including, without limitation, Orders enjoining persons or entities from pursuing any Released Claims against Defendant), dismissing all Released Claims on the merits and with prejudice, and permanently enjoining Settlement Class Members from initiating or pursuing proceedings on the Released Claims (except as set forth herein), or to ensure the fair and orderly administration of this settlement; and

c. entering any other necessary or appropriate Orders to protect and effectuate this Court's retention of continuing jurisdiction; provided, however, that nothing in this paragraph is intended to restrict the ability of the Parties to exercise their rights as otherwise provided in the Settlement.

19. Neither this Final Order and Judgment nor the Settlement (nor any other

document referred to herein, nor any action taken to carry out this Final Order and Judgment) is, may be construed as, or may be used as evidence of, a presumption, concession or an admission of liability or of any misrepresentation or omission in any statement or written document approved or made by American or any Released Persons or of the suitability of these or similar claims to class treatment in active litigation and trial; provided, however, that reference may be made to the Settlement in such proceedings solely as may be necessary to effectuate the Settlement.

20. The Action is hereby dismissed on the merits and with prejudice as to the Released Claims, without fees or costs to any Party except as otherwise provided in this Order and the Settlement.

**IT IS SO ORDERED.**

Dated this 5<sup>TH</sup> day of April, 2019

*William A. Young*  
\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE  
DISTRICT OF MASSACHUSETTS

## **EXHIBIT 2**

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UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

No. 1:17-cv-11297-WGY

MAX BAZERMAN, individually and on behalf of all others  
similarly situated,  
Plaintiffs

vs.

AMERICAN AIRLINES, INC.,  
Defendant

\*\*\*\*\*

For Hearing Before:  
Judge William G. Young

Fairness Hearing

United States District Court  
District of Massachusetts (Boston)  
One Courthouse Way  
Boston, Massachusetts 02210  
Thursday, April 4, 2019

\*\*\*\*\*

REPORTER: RICHARD H. ROMANOW, RPR  
Official Court Reporter  
United States District Court  
One Courthouse Way, Room 5510, Boston, MA 02210  
bulldog@richromanow.com

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A P P E A R A N C E S

LINDA M. DARDARIAN, ESQ.  
RAYMOND WENDELL, ESQ.  
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For defendant

1 P R O C E E D I N G S

2 (Begins, 2:00 p.m.)

3 THE CLERK: Now hearing Civil Matter 17-11297,  
4 Max Bazerman versus American Airlines.

5 THE COURT: Good afternoon. Would counsel  
6 identify themselves.

7 MS. DARDARIAN: Good afternoon, your Honor,  
8 Linda Dardarian for the plaintiffs and with me is my  
9 associate, Raymond Wendell.

10 MS. WILLIAMS: Good afternoon, your Honor,  
11 Gwyn Williams for the defendant, American Airlines, and  
12 with me is my colleague, Nicholas Lessin.

13 THE COURT: Good afternoon.

14 Well, this is a duly-called "fairness hearing" so  
15 let me ask, as we are in open court at the time and  
16 place decided, is there anyone here who wishes to raise  
17 any objection to the proposed settlement?

18 (Silence.)

19 THE COURT: I hear no such objection.

20 I have -- and I believe the answers will be clear,  
21 I've read these materials, but I want to hear it from  
22 you.

23 Turning to the plaintiffs. You've reviewed the  
24 releases that, um, are part of this settlement, which  
25 will be imposed upon the class -- and nothing wrong with

1 that, that's just part of the class system, but as  
2 you're officers of the court, are you satisfied that  
3 these releases release the defendant, American Airlines,  
4 from the matters resolved in this lawsuit, but don't  
5 slide over into some general release for all activities,  
6 do you represent that to the Court?

7 MR. WENDELL: Um, yes, your Honor. The  
8 release only applies to individuals who were directed  
9 the class notice and to our class members, according to  
10 the class definition, in settlement, or to anyone who  
11 filed a claim despite not being directed notice, but  
12 also had a valid verified claim. So it's a -- a very  
13 narrow release.

14 THE COURT: Thank you.

15 And my second question will not come as a  
16 surprise. If I've read this correctly, the claims  
17 administrator is or is in the process of actually  
18 disbursing over \$6 million to the class members, is that  
19 right?

20 MR. WENDELL: The class administrator has not  
21 yet begun -- or the settlement administrator rather has  
22 not yet begun disseminating the actual refunds, that  
23 won't happen until after this, I think it's 60 days  
24 after the final approval order and the settlement.

25 THE COURT: But assuming I approve it, how

1 much is going to be disbursed?

2 MR. WENDELL: Okay. So the most up-to-date  
3 number that we have is \$6,809,178. I think that's  
4 subject to a few little tweaks that are still being  
5 worked out in the code. And also the fact that  
6 individuals, after they receive their determination, do  
7 have the right to dispute that determination. Some have  
8 not yet received that determination due to continuing  
9 meeting and conferring between the parties.

10 THE COURT: And that money will go to the  
11 people who are now ascertained who have made claims?

12 MR. WENDELL: Correct.

13 THE COURT: All right. Now on top of that you  
14 seek the \$1.9 million that you're requesting in  
15 attorneys fees?

16 MR. WENDELL: Um, so I think we are seeking,  
17 um, \$2.75 million in attorneys fees and costs. The \$1.9  
18 million is the amount expected to be paid to the  
19 settlement administrator.

20 THE COURT: Wait a minute, I'm not clear here.  
21 I, um -- break this down, please.

22 The settlement administrator is, um, paid for  
23 being -- for discharging his duties as settlement  
24 administrator, so he gets \$1.9 million?

25 MR. WENDELL: Yes.



1 THE COURT: All right, and more than that, but  
2 in that vicinity.

3 And how much are you looking for for attorneys  
4 fees?

5 MR. WENDELL: It's \$2.75 million in attorneys  
6 fees and costs.

7 THE COURT: Attorneys fees and costs.

8 Well --

9 (Pause.)

10 MS. WILLIAMS: To be clear, your Honor, if I  
11 could? The costs, um, that they're referring to are not  
12 the settlement administration costs. So there's three  
13 buckets of money here, there's the money that would go  
14 directly to the claimants and that's the --

15 THE COURT: And that's the 6.8 --

16 MS. WILLIAMS: -- the 6.8 and change, call it.

17 THE COURT: All right.

18 MS. WILLIAMS: Um, there's the amount of money  
19 that American Airlines has been paying and will continue  
20 to pay to Angeion, the claims administrator. So as they  
21 do their work, they've been invoicing us for their work.  
22 The estimate is that by the time all their work is done,  
23 that it will add up to about 1.9. So American Airlines  
24 has been paying Angeion, the claims administrator, that  
25 amount of money. And then there are the attorneys fees

1 and costs that class counsel seek, which is a total of  
2 \$2.75 million, but the costs that we're talking about  
3 there are their -- are the law firm costs, you know,  
4 deposition transcripts and the like, and I think it's  
5 roughly \$50,000 or so worth of costs.

6 THE COURT: Thank you.

7 MS. DARDARIAN: And, your Honor, if I may?  
8 This is Linda Dardarian.

9 I'm prepared to address the Court's questions  
10 regarding attorneys fees and the incentive award to  
11 plaintiff Bazerman should there be concerns about that,  
12 and Mr. Wendell is prepared to address the final  
13 approval of the settlement.

14 THE COURT: Well, as I make it out here, um,  
15 how much -- refresh me as to how much Mr. Bazerman gets?

16 MS. DARDARIAN: On his behalf we have applied  
17 for an incentive award of \$2,500.

18 THE COURT: All right.

19 Here's my -- and, Ms. Dardarian, I'll hear you.  
20 Your fees are over a third of what the class itself  
21 gets. I'm not accustomed to approving fees that high.  
22 I don't question the good work that was done here, but  
23 if it's \$6.8 million, it will come to about \$2,250,000,  
24 not \$750,000.

25 MS. DARDARIAN: Um --

1 THE COURT: I'll hear you.

2 MS. DARDARIAN: Thank you, your Honor. And I  
3 appreciate your kind words about the quality of  
4 representation.

5 THE COURT: And they're sincerely meant, it's  
6 not some sort of pro forma. I've read all this, but  
7 I -- I cannot recall approving a settlement -- approving  
8 attorneys fees of more than 33 percent. I'm happy to be  
9 disabused of that if my memory is wrong.

10 MS. DARDARIAN: Your Honor, I have not come  
11 across a decision that was yours where you have approved  
12 a --

13 THE COURT: Well why should I do it here?

14 MS. DARDARIAN: Because here, um -- well  
15 actually I take that back.

16 The settlement agreement in this case allows class  
17 counsel to apply for an attorneys fees award under the  
18 common fund approach.

19 THE COURT: I appreciate that.

20 MS. DARDARIAN: And typically a common fund  
21 includes all of the settlement benefits that are being  
22 provided to the class and attorneys fees are paid from  
23 the settlement fund as a whole, and typically a  
24 settlement fund includes four elements, and those are  
25 payment of claims or refunds to the class, the costs of

1 notice and claims administration, plaintiffs' attorneys  
2 fees and costs, and the incentive award to the class  
3 representatives.

4 THE COURT: And if I add all those you're  
5 within a third, I understand that.

6 MS. DARDARIAN: Yes, your Honor, we're  
7 actually below a third.

8 THE COURT: I understand that. But here, um,  
9 you're getting -- as compared to the actual members of  
10 the class, you're getting well more than a third.

11 MS. DARDARIAN: So, your Honor, our position  
12 is that, um, the fee should not be limited to a  
13 percentage of the amount that is being paid out in  
14 refunds because truly a settlement fund includes other  
15 pots of money, including administration costs and  
16 attorneys fees and the incentive award. And so because  
17 the settlement agreement allows us to apply for fees on  
18 the basis of the common fund approach, essentially what  
19 we're doing is we are pooling these four different  
20 pieces of money that -- or buckets of money that  
21 American Airlines is paying on behalf of the class,  
22 we're pooling them together to create a settlement fund  
23 from which we are asking a percentage of the fund to be  
24 paid to us in attorneys fees.

25 THE COURT: All right, I understand the

1 calculus.

2 MS. DARDARIAN: And the reason why the claims  
3 administration is included in the calculus is because  
4 claims administration provides a benefit to the class in  
5 that it lets the class members know that they have the  
6 right to seek refunds and it ensures that the refunds  
7 are accurately calculated and actually delivered to the  
8 class members, and that is a value that would otherwise  
9 come out of their pockets. But it isn't here because  
10 American has agreed to pay that separately.  
11 Additionally, attorney fees are a benefit to the class  
12 because without a payment of attorneys fees the class  
13 would get a windfall.

14 THE COURT: Of course, of course it's a  
15 benefit to the class, it just seems to me that a third  
16 of the overall recovery to the class, what's going into  
17 their pockets is, um, sufficient.

18 Let me ask American. There's no objection on  
19 American were I to award this?

20 MR. LESSIN: Award one-third of the benefit?

21 THE COURT: No, award \$2,750,000.

22 MR. LESSIN: Oh, we do -- we do object, your  
23 Honor.

24 THE COURT: I thought so. What if I were to  
25 award \$2,250,000?

1 MR. LESSIN: Yeah, I think case law suggests  
2 between 20 percent and 30 percent.

3 THE COURT: So you object to that? Well that  
4 would be 33 percent.

5 MR. LESSIN: No, your Honor, we wouldn't  
6 object to a third of the actual benefit --

7 THE COURT: I'm sure you wouldn't.

8 All right. You know the matter is a serious  
9 matter and this is not an inconsequential amount of  
10 money here that's in dispute.

11 (Pause.)

12 THE COURT: Let me say this in an effort to  
13 move this along.

14 I mean what I say, Ms. Dardarian, that I think  
15 plaintiffs' counsel has acted in an exemplary fashion  
16 here and in a most complex area has obtained for the  
17 class a fair and a just settlement. And not simply to  
18 be evenhanded, but because I believe it, I think that  
19 counsel for American Airlines equally has represented  
20 their client in a both thoughtful and sensitive way,  
21 without surrendering in any way their client's rights in  
22 the circumstances, and this is a hard bargain and just  
23 settlement for the class.

24 Now having said that, I will tell you I'm prepared  
25 today to approve the settlement, to approve \$2,250,000

1 attorneys fees -- and by approving the settlement,  
2 approve the award, approve the amount of the settlement,  
3 and indeed I'm prepared to allow further briefing and  
4 argument on what you claim is the remaining 500,000.  
5 It's not a matter for settlement, it's a matter for the  
6 Court to determine.

7 So my suggestion is, I'll go right to 33 percent  
8 of the funds of the class today, I'll give you each 30  
9 days to file further briefs addressed to the issue, if  
10 anything further is to be said, and then I'll decide it  
11 on the papers.

12 How does that suit, Ms. Dardarian?

13 MS. DARDARIAN: That suits me very well, your  
14 Honor.

15 THE COURT: And American?

16 MS. WILLIAMS: I'm preempting my colleague who  
17 was going to argue, but just as to this -- that question  
18 of briefing, um, I think the parties actually already  
19 briefed this at some length in the motion for attorneys  
20 fees --

21 THE COURT: Oh, I agree.

22 MS. WILLIAMS: So I just wanted to -- if you  
23 have any guidance, your Honor, about anything in  
24 particular that you were hoping to hear more on, it may  
25 be helpful to the parties, so you don't get duplicative

1 arguments.

2 THE COURT: That's very helpful. It's not  
3 that I'm hesitant to rule --

4 MS. WILLIAMS: I didn't think so, your Honor.

5 THE COURT: -- you have thoroughly briefed it,  
6 and I'm not asking for the expenditure of more money or  
7 more time, but \$500,000 in dispute is a significant  
8 piece of money, so I'm going to wait another 30 days.  
9 If someone wants to submit something further, that's  
10 fine, but I do not require it, and I certainly do not  
11 expect that arguments already made will be made again.  
12 It just seems the fairest outcome to give plaintiffs,  
13 who have done a good job, a chance here. I'm not  
14 prepared just to knock their request down by half a  
15 million dollars on the preparation that I've made for  
16 this hearing. That's the most honest way I can say it.  
17 I may do exactly that, but I'm going to reflect on it,  
18 sensitive because you have objected and I'm sensitive to  
19 that.

20 So that's the order of the Court, the settlement  
21 is approved in every respect and at least \$2,250,000 is  
22 awarded to the plaintiffs as attorneys fees. The  
23 possibility of a further award will abide a further  
24 order, which will be entered no sooner than 30 days from  
25 today's date. And I'll sign the document because we



1 have it here.

2 MS. DARDARIAN: Thank you very much, your  
3 Honor.

4 THE COURT: Thank you.

5 (Ends, 2:20 p.m.)  
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C E R T I F I C A T E

I, RICHARD H. ROMANOW, OFFICIAL COURT REPORTER,  
do hereby certify that the foregoing record is a true  
and accurate transcription of my stenographic notes,  
before Judge William G. Young, on Thursday, April 4,  
2019, to the best of my skill and ability.

/s/ Richard H. Romanow 04-09-19

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RICHARD H. ROMANOW      Date

# **EXHIBIT 3**

fees and matter id = '649' and not hidden and not hidden and not on hold and date <=8/27/2021

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**Matter ID: 649**  
**Client Sort: Boston**  
**Description: City of Boston**

<u>Professional</u>	<u>Hours</u>	<u>Current Rate</u>	<u>Dollars</u>
Dardarian, Linda	207.30	795.00	164,803.50
Wendell, Raymond	363.00	495.00	179,685.00
Fisher, Katharine	20.20	465.00	9,393.00
Grimes, Scott	93.40	255.00	23,817.00
Kirkpatrick, Stuart	203.90	225.00	45,877.50
Valdez, Damon	110.90	225.00	24,952.50
<b>Total for this Matter and Date Range in Query:</b>	<b>998.70</b>		<b>448,528.50</b>

## GBDH Billing Detail

City of Boston

fees and matter id = '649' and not hidden and not hidden and not on hold and date &lt;=8/27/2021

<b>Date</b>	<b>Professional</b>	<b>Narrative</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
03/09/2017	Dardarian, Linda	Review and comment on Open Record Act request	0.10	795.00	79.50
03/09/2017	Dardarian, Linda	Analyze case materials	0.20	795.00	159.00
03/09/2017	Dardarian, Linda	Conference w/ R. Wendell re investigation	0.10	795.00	79.50
03/16/2017	Grimes, Scott	Conference w/ L. Dardarian re GoogleEarth review of Boston curb ramps	0.50	255.00	127.50
03/16/2017	Grimes, Scott	Conference w/ S. Kirkpatrick re Boston curb ramps	0.30	255.00	76.50
03/16/2017	Grimes, Scott	Conference w/ L. Dardarian, A. Lee, R. Wendell, and S. Kirkpatrick re curb ramp violations tracking	0.50	255.00	127.50
03/16/2017	Kirkpatrick, Stuart	Research and chart public buildings and locations in preparation for curb ramp violation mapping project	4.30	225.00	967.50
03/16/2017	Kirkpatrick, Stuart	Conference with S. Grimes re: curb ramp violation mapping project	0.30	225.00	67.50
03/16/2017	Kirkpatrick, Stuart	Conference with legal team re: mapping project goals and naming conventions for coders	0.50	225.00	112.50
03/16/2017	Dardarian, Linda	Conference w/ S. Kirkpatrick, S. Grimes, R. Wendell, and A. Lee re same	0.50	795.00	397.50
03/17/2017	Valdez, Damon	Conference w/ S. Kirkpatrick and C. Trevino re GoogleEarth review of certain Boston streets	0.30	225.00	67.50
03/17/2017	Kirkpatrick, Stuart	Prepare naming convention chart and instructions for mapping coders	0.40	225.00	90.00
03/17/2017	Kirkpatrick, Stuart	Conference with D. Valdez and C. Trevino re: curb ramp mapping project	0.30	225.00	67.50
03/17/2017	Kirkpatrick, Stuart	Analyze and chart curb ramp violations	2.70	225.00	607.50
03/17/2017	Dardarian, Linda	Case investigation strategy	0.20	795.00	159.00
03/20/2017	Dardarian, Linda	Review case investigation materials	0.20	795.00	159.00
03/20/2017	Kirkpatrick, Stuart	Analyze and chart curb ramp violations	3.30	225.00	742.50
03/21/2017	Kirkpatrick, Stuart	Analyze and chart curb ramp violations	1.50	225.00	337.50
03/22/2017	Kirkpatrick, Stuart	Analyze curb ramp violation	0.60	225.00	135.00

## GBDH Billing Detail

City of Boston

fees and matter id = '649' and not hidden and not hidden and not on hold and date &lt;=8/27/2021

03/22/2017	Kirkpatrick, Stuart	Conference with D. Valdez re: curb ramp violation mapping project procedures	0.20	225.00	45.00
03/22/2017	Kirkpatrick, Stuart	Analyze and chart curb ramp violations	0.30	225.00	67.50
03/22/2017	Valdez, Damon	Research re possible ADA violations of Boston streets	3.10	225.00	697.50
03/23/2017	Valdez, Damon	Research re possible ADA violations of Boston streets	2.40	225.00	540.00
03/24/2017	Valdez, Damon	Research re possible ADA violations of Boston streets	3.20	225.00	720.00
07/27/2017	Grimes, Scott	Phone call (partial) w/ L. Dardarian, R. Wendell, T. Fox, S. Eichner, and T. Murphy re case investigation	0.60	255.00	153.00
07/27/2017	Grimes, Scott	Conference w/ L. Dardarian and R. Wendell re same	0.20	255.00	51.00
07/27/2017	Dardarian, Linda	Conference w/ S. Grimes, R. Wendell, S. Eichner, T. Murphy and T. Fox re analysis of records provided in response to public record act request re Boston curb ramp and sidewalk access barriers	0.90	795.00	715.50
07/27/2017	Dardarian, Linda	Conference w/ R. Wendell and S. Grimes re same and identifying corners w/ non-compliant ramps	0.20	795.00	159.00
07/27/2017	Wendell, Raymond	Conference with L. Dardarian, S. Grimes, T. Fox, S. Eichner, T. Murphy, and C. Hall re: analysis of documents received from City in response to public record request.	0.90	495.00	445.50
07/27/2017	Wendell, Raymond	Conference with L. Dardarian and S. Grimes re: analysis of documents received from City in response to public record request.	0.20	495.00	99.00
07/27/2017	Grimes, Scott	Internet research re Boston policies re curb ramps request, curb ramp locations	2.30	255.00	586.50
07/28/2017	Grimes, Scott	Internet research re complaint procedures	1.90	255.00	484.50
07/31/2017	Grimes, Scott	Review street improvement database and curb ramp location web site	3.10	255.00	790.50
07/31/2017	Grimes, Scott	Phone call w/ T. Fox re research re curb missing ramp	0.70	255.00	178.50
08/02/2017	Grimes, Scott	Review memo re curb ramp database coding	0.20	255.00	51.00

## GBDH Billing Detail

City of Boston

fees and matter id = '649' and not hidden and not hidden and not on hold and date &lt;=8/27/2021

08/02/2017	Grimes, Scott	Multiple emails with team re issues with curb ramp coding database	0.30	255.00	76.50
08/03/2017	Grimes, Scott	Emails w/ T. Fox re curb ramp coding database	0.10	255.00	25.50
08/07/2017	Grimes, Scott	Research re curb ramp violations and update database same	2.20	255.00	561.00
08/08/2017	Grimes, Scott	Research re curb ramp violations	1.30	255.00	331.50
08/09/2017	Dardarian, Linda	Conference w/ S. Grimes re analysis of curb ramps in Boston	0.10	795.00	79.50
08/09/2017	Grimes, Scott	Research re curb ramp violations and update database re same	5.70	255.00	1,453.50
08/09/2017	Grimes, Scott	Conference w/ L. Dardarian re same	0.10	255.00	25.50
08/10/2017	Grimes, Scott	Research re curb ramp violations and update database re same	2.80	255.00	714.00
08/11/2017	Grimes, Scott	Research re curb ramp violations and update database re same	3.30	255.00	841.50
08/14/2017	Grimes, Scott	Research curb ramp violations and update database re same	3.50	255.00	892.50
08/16/2017	Grimes, Scott	Research re curb ramp violations and update database re same	4.90	255.00	1,249.50
09/13/2017	Grimes, Scott	Research re missing/non-compliant curb ramps	4.60	255.00	1,173.00
09/14/2017	Grimes, Scott	Research re missing/non-compliant curb ramps	1.10	255.00	280.50
09/15/2017	Grimes, Scott	Research re missing/non-compliant curb ramps	1.90	255.00	484.50
09/22/2017	Grimes, Scott	Research re missing or non-compliant curb ramps	3.30	255.00	841.50
10/06/2017	Grimes, Scott	Research re curb ramp violations	1.50	255.00	382.50
10/09/2017	Grimes, Scott	Research potential curb ramp violations and update database re same	4.90	255.00	1,249.50
10/10/2017	Grimes, Scott	Research re potential curb ramp violations and update database re same	3.00	255.00	765.00
10/11/2017	Valdez, Damon	Review memo re from CREEC re project to review street ramps and code them for violations	0.50	225.00	112.50

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10/11/2017	Valdez, Damon	Conference w/ S. Kirkpatrick re same	0.20	225.00	45.00
10/11/2017	Kirkpatrick, Stuart	Review and chart curb ramp violations in CREEC database	2.40	225.00	540.00
10/11/2017	Grimes, Scott	Research potential curb ramp violations and update database re same	4.10	255.00	1,045.50
10/12/2017	Kirkpatrick, Stuart	Review and chart curb ramp violations in CREEC database	6.80	225.00	1,530.00
10/12/2017	Grimes, Scott	Research potential curb ramp violations and update database re same	3.90	255.00	994.50
10/13/2017	Kirkpatrick, Stuart	Review and chart curb ramp violations in CREEC database	5.80	225.00	1,305.00
10/13/2017	Grimes, Scott	Research re curb ramp violations	1.60	255.00	408.00
10/16/2017	Kirkpatrick, Stuart	Review and chart curb ramp violations in CREEC database	6.20	225.00	1,395.00
10/16/2017	Valdez, Damon	Exchange emails w/ C. Hall re data review and coding project	0.20	225.00	45.00
10/17/2017	Kirkpatrick, Stuart	Review and chart curb ramp violations in CREEC database	6.10	225.00	1,372.50
10/18/2017	Kirkpatrick, Stuart	Review and chart curb ramp violations in CREEC database	6.40	225.00	1,440.00
10/18/2017	Valdez, Damon	Review city streets for ramp violations and update tracking database re same	2.30	225.00	517.50
10/19/2017	Valdez, Damon	Review city streets for ramp violations and update tracking database re same	6.30	225.00	1,417.50
10/19/2017	Kirkpatrick, Stuart	Review and chart curb ramp violations in CREEC database	5.90	225.00	1,327.50
10/19/2017	Grimes, Scott	Review potential curb ramp violations and update database re same	1.10	255.00	280.50
10/20/2017	Valdez, Damon	Review city streets for ramp violations and update tracking database re same	5.60	225.00	1,260.00
10/20/2017	Kirkpatrick, Stuart	Review and chart curb ramp violations in CREEC database	5.80	225.00	1,305.00
10/23/2017	Valdez, Damon	Review city streets for ramp violations and update tracking database re same	5.30	225.00	1,192.50
10/23/2017	Kirkpatrick, Stuart	Review and chart curb ramp violations in CREEC database	6.80	225.00	1,530.00
10/23/2017	Grimes, Scott	Research potential curb ramp violations	1.10	255.00	280.50
10/24/2017	Valdez, Damon	Review city streets for ramp violations and update tracking database re same	6.10	225.00	1,372.50



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10/24/2017	Kirkpatrick, Stuart	Review and chart curb ramp violations in CREEC database	6.10	225.00	1,372.50
10/25/2017	Kirkpatrick, Stuart	Review and chart curb ramp violations in CREEC database	5.80	225.00	1,305.00
10/25/2017	Valdez, Damon	Review city streets for ramp violations and update tracking database re same	5.70	225.00	1,282.50
10/26/2017	Kirkpatrick, Stuart	Review and chart curb ramp violations in CREEC database	6.20	225.00	1,395.00
10/26/2017	Valdez, Damon	Review city streets for ramp violations and update tracking database re same	5.10	225.00	1,147.50
10/26/2017	Grimes, Scott	Research potential curb cut violations	2.10	255.00	535.50
10/27/2017	Kirkpatrick, Stuart	Review and chart curb ramp violations in CREEC database	4.40	225.00	990.00
10/27/2017	Grimes, Scott	Research potential curb cut violations	2.10	255.00	535.50
10/30/2017	Kirkpatrick, Stuart	Review and chart curb ramp violations in CREEC database	5.40	225.00	1,215.00
10/30/2017	Valdez, Damon	Review city streets for ramp violations and update tracking database re same	5.70	225.00	1,282.50
10/31/2017	Kirkpatrick, Stuart	Review and chart curb ramp violations in CREEC database	3.60	225.00	810.00
10/31/2017	Valdez, Damon	Review city streets for ramp violations and update tracking database re same	6.80	225.00	1,530.00
11/01/2017	Valdez, Damon	Review city streets for ramp violations and update tracking database re same	3.10	225.00	697.50
11/03/2017	Kirkpatrick, Stuart	Review and chart curb ramp violations in CREEC database	6.70	225.00	1,507.50
11/06/2017	Kirkpatrick, Stuart	Review and chart curb ramp violations in CREEC database	4.60	225.00	1,035.00
11/07/2017	Kirkpatrick, Stuart	Review and chart curb ramp violations in CREEC database	6.80	225.00	1,530.00
11/07/2017	Valdez, Damon	Review city streets for ramp violations and update tracking database re same	6.20	225.00	1,395.00
11/08/2017	Kirkpatrick, Stuart	Review and chart curb ramp violations in CREEC database	6.60	225.00	1,485.00
11/09/2017	Kirkpatrick, Stuart	Review and chart curb ramp violations in CREEC database	3.80	225.00	855.00
11/09/2017	Valdez, Damon	Review city streets for ramp violations and update tracking database re same	5.90	225.00	1,327.50
11/10/2017	Kirkpatrick, Stuart	Review and chart curb ramp violations in CREEC database	1.70	225.00	382.50

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11/10/2017	Valdez, Damon	Review city streets for ramp violations and update tracking database re same	6.40	225.00	1,440.00
11/13/2017	Valdez, Damon	Review city streets for ramp violations and update tracking database re same	4.20	225.00	945.00
11/14/2017	Kirkpatrick, Stuart	Review and chart curb ramp violations in CREEC database	2.30	225.00	517.50
11/14/2017	Valdez, Damon	Review city streets for ramp violations and update tracking database re same	1.80	225.00	405.00
11/15/2017	Kirkpatrick, Stuart	Review and chart curb ramp violations in CREEC database	5.10	225.00	1,147.50
11/16/2017	Kirkpatrick, Stuart	Review and chart curb ramp violations in CREEC database	2.90	225.00	652.50
11/16/2017	Valdez, Damon	Review city streets for ramp violations and update tracking database re same	2.20	225.00	495.00
11/17/2017	Valdez, Damon	Review city streets for ramp violations and update tracking database re same	3.90	225.00	877.50
11/28/2017	Valdez, Damon	Review city streets for ramp violations and update tracking database re same	3.30	225.00	742.50
11/29/2017	Valdez, Damon	Review city streets for ramp violations and update tracking database re same	2.40	225.00	540.00
11/30/2017	Valdez, Damon	Review city streets for ramp violations and update tracking database re same	3.20	225.00	720.00
12/01/2017	Valdez, Damon	Review city streets for ramp violations and update tracking database re same	4.20	225.00	945.00
12/04/2017	Kirkpatrick, Stuart	Review and chart curb ramp violations in CREEC database	3.20	225.00	720.00
12/05/2017	Kirkpatrick, Stuart	Review and chart curb ramp violations in CREEC database	3.40	225.00	765.00
12/06/2017	Kirkpatrick, Stuart	Review and chart curb ramp violations in CREEC database	1.30	225.00	292.50
12/07/2017	Kirkpatrick, Stuart	Review and chart curb ramp violations in CREEC database	2.90	225.00	652.50
12/08/2017	Kirkpatrick, Stuart	Review and chart curb ramp violations in CREEC database	5.70	225.00	1,282.50
12/11/2017	Kirkpatrick, Stuart	Review and chart curb ramp violations in CREEC database	3.80	225.00	855.00
12/12/2017	Kirkpatrick, Stuart	Review and chart curb ramp violations in CREEC database	5.10	225.00	1,147.50
12/14/2017	Valdez, Damon	Review city streets for ramp violations and update tracking database re same	2.30	225.00	517.50

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01/04/2018	Kirkpatrick, Stuart	Review and chart curb ramp violations in CREEC database	1.80	225.00	405.00
01/10/2018	Kirkpatrick, Stuart	Review and chart curb ramp violations in CREEC database	4.80	225.00	1,080.00
01/11/2018	Kirkpatrick, Stuart	Review and chart curb ramp violations in CREEC database	4.40	225.00	990.00
01/25/2018	Dardarian, Linda	Conference w/ S. Grimes re status of curb ramp investigation	0.10	795.00	79.50
01/25/2018	Grimes, Scott	Conference w/ L. Dardarian re status of curb ramp investigation	0.10	255.00	25.50
01/29/2018	Kirkpatrick, Stuart	Conference call with T. Fox, L. Dardarian and S. Grimes re: curb ramp investigation status and results	0.40	225.00	90.00
01/29/2018	Dardarian, Linda	Conference w/ T. Fox, S. Kirkpatrick, S. Grimes re investigation of curb ramps barriers of Pedestrian Right of Way	0.40	795.00	318.00
01/29/2018	Grimes, Scott	Conference w/ T. Fox, L. Dardarian and S. Kirkpatrick re status review of Boston curb ramps	0.40	255.00	102.00
02/01/2018	Grimes, Scott	Conference w/ L. Dardarian, R. Wendell, T. Fox S. Eichner, T. Murphy and R. Glassner re demand letter and case investigation	0.50	255.00	127.50
02/01/2018	Grimes, Scott	Conference w/ L. Dardarian, R. Wendell re demand letter and case investigation	0.20	255.00	51.00
02/01/2018	Grimes, Scott	Research re non-compliant curb ramps	0.80	255.00	204.00
02/01/2018	Grimes, Scott	Review Mass. regulations re curb ramp construction	0.30	255.00	76.50
02/01/2018	Wendell, Raymond	Strategy conference with L. Dardarian, S. Grimes, T. Fox, T. Murphy, R. Glassman, and S. Eichner re: data analysis and demand letter.	0.50	495.00	247.50
02/01/2018	Wendell, Raymond	Strategy conference with L. Dardarian, and S. Grimes re: data analysis and demand letter.	0.20	495.00	99.00
02/01/2018	Dardarian, Linda	Review state curb ramp regulations	0.10	795.00	79.50
02/01/2018	Dardarian, Linda	Conference w/ S. Grimes re scope of violations found in pedestrian right of way	0.10	795.00	79.50

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02/01/2018	Dardarian, Linda	Conference w/ T. Fox, R. Wendell, S. Grimes, S. Eichner and T. Murphy re data analysis and demand letter	0.50	795.00	397.50
02/01/2018	Dardarian, Linda	Conference w/ R. Wendell and S. Grimes re same	0.20	795.00	159.00
02/01/2018	Kirkpatrick, Stuart	Review curb ramp locations and screenshot examples of non-compliant curb ramp corners	0.60	225.00	135.00
02/01/2018	Grimes, Scott	Review City of Boston web site for capital spending plans	0.60	255.00	153.00
02/01/2018	Grimes, Scott	Conference w/ L. Dardarian re results of research re non-compliant curb ramps	0.10	255.00	25.50
02/13/2018	Grimes, Scott	Conference w/ L. Dardarian re demand letter preparation	0.30	255.00	76.50
03/06/2018	Dardarian, Linda	Review and edit demand letter	0.80	795.00	636.00
03/06/2018	Dardarian, Linda	Memo to T Fox for re same	0.10	795.00	79.50
03/19/2018	Dardarian, Linda	Memo to T. Fox re scope of claims	0.30	795.00	238.50
05/02/2018	Dardarian, Linda	Review and edit demand letter	1.10	795.00	874.50
05/03/2018	Dardarian, Linda	Review and edit demand letter	0.70	795.00	556.50
05/04/2018	Dardarian, Linda	Review and edit Structured Negotiations Agreement	0.20	795.00	159.00
05/04/2018	Dardarian, Linda	Email T. Fox re same	0.10	795.00	79.50
05/08/2018	Dardarian, Linda	Review status of demand letter	0.10	795.00	79.50
06/18/2018	Dardarian, Linda	Draft memo to T. Fox re status of negotiations	0.10	795.00	79.50
06/18/2018	Dardarian, Linda	Review evidence of violations	0.10	795.00	79.50
06/19/2018	Dardarian, Linda	Draft memo to R. Wendell re draft complaint and defendant's unresponsiveness to demand letter	0.10	795.00	79.50
06/19/2018	Dardarian, Linda	Review City's sidewalk equity program and documents	0.20	795.00	159.00
07/09/2018	Wendell, Raymond	Meet and confer with L. Dardarian, M. Sun, T. Murphy, S. Eichner, T. Fox, and David Soares from City of Boston re: initial steps in settlement negotiations.	0.50	495.00	247.50
07/09/2018	Wendell, Raymond	Conference with L. Dardarian and M. Sun debriefing on meet and confer call with City of Boston.	0.10	495.00	49.50

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07/09/2018	Dardarian, Linda	Prepare for conference w/ City re structured negotiations and outline points for presentation	0.80	795.00	636.00
07/09/2018	Dardarian, Linda	Conference w/ T. Fox and S. Eichner re same	0.40	795.00	318.00
07/09/2018	Dardarian, Linda	Conference w/ R. Wendell, M. Sun, T. Fox, T. Murphy, D. Soares and S. Eichner re same	0.50	795.00	397.50
07/09/2018	Dardarian, Linda	Conference w/ R. Wendell and M. Sun re draft complaint and structured negotiations	0.10	795.00	79.50
08/02/2018	Wendell, Raymond	Edit draft complaint.	2.40	495.00	1,188.00
08/02/2018	Wendell, Raymond	Memorandum to M. Sun re: draft complaint.	0.20	495.00	99.00
09/24/2018	Dardarian, Linda	Conference w/ T. Fox re complaint and meeting w/ City	0.10	795.00	79.50
10/01/2018	Dardarian, Linda	Memos to and from T. Fox re proposed meeting w/ defendant and agenda for same	0.20	795.00	159.00
10/15/2018	Dardarian, Linda	Memos to and from T. Fox re meeting w/ clients and meeting w/ the City re negotiations	0.20	795.00	159.00
10/16/2018	Dardarian, Linda	Memos to and from T. Murphy re preparation for client meeting	0.20	795.00	159.00
10/18/2018	Valdez, Damon	Review and analyze re street and sidewalk improvements	0.20	225.00	45.00
10/18/2018	Valdez, Damon	Exchange emails w/ L. Dardarian re same	0.20	225.00	45.00
10/18/2018	Dardarian, Linda	Prepare for call w/ claimants and city attorneys re curb ramp negotiations	1.20	795.00	954.00
10/18/2018	Dardarian, Linda	Lead conference w/ S. Eichner, T. Murphy, T. Fox, J. Lederman and A. Cederbaum re structured negotiations, information we need to productive meeting, and elements of settlement agreement	0.50	795.00	397.50
10/18/2018	Dardarian, Linda	Memos to and from S. Eichner, T. Murphy, T. Fox re same	0.10	795.00	79.50
10/19/2018	Dardarian, Linda	Draft correspondence to City re information necessary to prepare for in-person meeting	0.80	795.00	636.00
10/19/2018	Valdez, Damon	Exchange emails w/ L. Dardarian re documents needed for meeting w/ defendant	0.20	225.00	45.00

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10/19/2018	Valdez, Damon	Analyze documents for attorney use and review at meeting w/ defendant	0.40	225.00	90.00
10/26/2018	Dardarian, Linda	Draft correspondence to J. Lederman re information exchange	0.10	795.00	79.50
10/26/2018	Dardarian, Linda	Prepare for client call re meeting w/ the City	0.20	795.00	159.00
10/26/2018	Valdez, Damon	Analyze materials for L. Dardarian to review and use at meeting w/ defendant	0.90	225.00	202.50
10/26/2018	Valdez, Damon	Draft email to L. Dardarian re same.	0.10	225.00	22.50
10/29/2018	Dardarian, Linda	Prepare for call w/ clients re meeting w/ City	0.50	795.00	397.50
10/29/2018	Dardarian, Linda	Conference w/ T. Fox, T. Murphy, S. Eichner, C. Hall, C. Flanagan and M. Muehe re same	1.00	795.00	795.00
10/29/2018	Dardarian, Linda	Further prepare for meeting w/ Boston representatives	0.30	795.00	238.50
10/29/2018	Dardarian, Linda	Correspondences to and from the City and co-counsel re same	0.30	795.00	238.50
10/29/2018	Wendell, Raymond	Conference with L. Dardarian, T. Fox, T. Murphy, S. Eichner, and clients M. Muehe, C. Evans, and C. Flanagan re: preparation for meeting with City.	1.00	495.00	495.00
10/30/2018	Dardarian, Linda	Draft memos to T. Fox re debriefing meeting w/ City and follow up w/ City re information request	0.20	795.00	159.00
10/30/2018	Dardarian, Linda	Strategy re call w/ Boston	0.10	795.00	79.50
10/30/2018	Dardarian, Linda	Review documents produced by the City	0.30	795.00	238.50
10/31/2018	Dardarian, Linda	Lead conference w/ A. Cederbaum, J. Lederman, T. Fox, T. Murphy and S. Eichner (for part) re information exchange and in person meeting	0.50	795.00	397.50
12/04/2018	Dardarian, Linda	Conference w/ T. Fox and T. Murphy re preparation for meeting w/ the City re curb ramps	0.30	795.00	238.50

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12/05/2018	Dardarian, Linda	Prepare for meeting re curb ramp remediation - review documents from the City, prior correspondence, conversations, and outline presentation	6.90	795.00	5,485.50
12/06/2018	Dardarian, Linda	Prepare for meeting w/ City re curb ramp negotiations	0.80	795.00	636.00
12/06/2018	Dardarian, Linda	Lead conference w/ J. Lederman, A. Cederbaum, K. Choe, K. McCash, C. Evans, M. Muehe, C. Flanagan, T. Fox, T. Murphy, S. Eichner re structured negotiations re curb ramp program	3.60	795.00	2,862.00
12/06/2018	Dardarian, Linda	Conference w/ R. Wendell re same	0.10	795.00	79.50
12/07/2018	Dardarian, Linda	Review and edit memo to the City re additional information needed for negotiations	0.40	795.00	318.00
12/17/2018	Dardarian, Linda	Correspondences to and from C. Evans re flooded ramps	0.10	795.00	79.50
01/09/2019	Dardarian, Linda	Memo to T. Murphy and T. Fox re information exchange for negotiations w/ Boston	0.40	795.00	318.00
03/04/2019	Dardarian, Linda	Prepare for call w/ co-counsel re negotiations and information from the City	0.30	795.00	238.50
03/04/2019	Dardarian, Linda	Conference w/ T. Fox, S. Eichner and T. Murphy re same S. Eichner for part)	1.00	795.00	795.00
03/04/2019	Dardarian, Linda	Review materials from defendants and prior call dates, prepare outline for settlement call w/ the City	2.70	795.00	2,146.50
03/05/2019	Wendell, Raymond	Conference with L. Dardarian, T. Fox, T. Murphy, S. Eichner, C. Flanagan, K. Choe, J. Doonan, J. Lederman, A. Cederbaum, and J. Emery re: Boston's systems for maintaining and inspecting the pedestrian right of way for disability access.	2.20	495.00	1,089.00
03/05/2019	Dardarian, Linda	Prepare for call w/ Boston re curb ramps	0.50	795.00	397.50

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03/05/2019	Dardarian, Linda	Lead conference w/ R. Wendell, T. Fox, T. Murphy S. Eichner, A. Cederbaum, J. Lederman, Krista, Jessica, K. Choe, and J. Emery re City pedestrian right of way and jurisdiction, curb ramps requests, systems, snow removal, inspections and surveys of pedestrian right of way	2.20	795.00	1,749.00
03/05/2019	Dardarian, Linda	Follow up w/ T. Fox, T. Murphy, S. Eichner re same	0.10	795.00	79.50
03/07/2019	Dardarian, Linda	Review and edit memo to the City re follow up from meeting	0.50	795.00	397.50
03/25/2019	Dardarian, Linda	Prepare for 4/2 meeting w/ the City re curb ramps	0.40	795.00	318.00
04/01/2019	Dardarian, Linda	Prepare for meeting w/ City re curb ramps	0.50	795.00	397.50
04/02/2019	Dardarian, Linda	Travel to Boston for curb ramp meeting w/ City and prepare for same en route	4.00	795.00	3,180.00
04/02/2019	Dardarian, Linda	Conference w/ T. Fox, S. Eichner and T. Murphy to prepare for meeting w/ the City	0.50	795.00	397.50
04/02/2019	Dardarian, Linda	Meet w/ A. Cederbaum, J. Lederman, K. Chao, Kristin, Jessica, T. Fox, S. Eichner and M. Muehe re curb ramp issues	1.60	795.00	1,272.00
04/02/2019	Dardarian, Linda	Debrief w/ S. Eichner and M. Muehe re same	0.30	795.00	238.50
04/02/2019	Dardarian, Linda	Travel from meeting w/ City	0.30	795.00	238.50
04/19/2019	Dardarian, Linda	Draft memo to R. Wendell re draft curb ramp term sheet	0.50	795.00	397.50
04/19/2019	Dardarian, Linda	Conference w/ R. Wendell re same	0.20	795.00	159.00
04/19/2019	Wendell, Raymond	Conference w/ L. Dardarian re draft term sheet	0.20	495.00	99.00
04/22/2019	Wendell, Raymond	Draft settlement term sheet	6.20	495.00	3,069.00
04/23/2019	Dardarian, Linda	Review and edit plaintiffs' term sheet	1.20	795.00	954.00
05/10/2019	Dardarian, Linda	Prepare for negotiations w/ defendant	0.20	795.00	159.00
05/13/2019	Dardarian, Linda	Prepare for call w/ defendant re draft term sheet	0.60	795.00	477.00
05/13/2019	Dardarian, Linda	Conference w/ T. Fox, R. Wendell, T. Murphy re same	0.10	795.00	79.50
05/13/2019	Dardarian, Linda	Conference w/ J. Lederman, A. Cederbaum, T. Fox, T. Murphy and R. Wendell re same	0.90	795.00	715.50



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05/13/2019	Dardarian, Linda	Draft memo to T. Murphy, T. Fox and R. Wendell re same	0.10	795.00	79.50
05/13/2019	Wendell, Raymond	Conference with L. Dardarian, T. Fox, and T. Murphy to prepare for call with the City re: term sheet.	0.10	495.00	49.50
05/13/2019	Wendell, Raymond	Conference with L. Dardarian, T. Fox, T. Murphy, and J. Lederman and A. Cederbaum from City of Boston re: Plaintiff's term sheet.	0.90	495.00	445.50
06/04/2019	Dardarian, Linda	Review City's edits to term sheet	0.10	795.00	79.50
06/04/2019	Dardarian, Linda	Draft correspondence to co-counsel re same	0.10	795.00	79.50
06/05/2019	Dardarian, Linda	Prepare for conference w/ defendants re terms of settlement	0.40	795.00	318.00
06/06/2019	Dardarian, Linda	Conference w/ T. Murphy and T. Fox to prepare for settlement conference w/ City attorneys	0.30	795.00	238.50
06/06/2019	Dardarian, Linda	Lead conference w/ T. Murphy, T. Fox, J. Lederman and A. Cederbaum re settlement terms and curb ramp survey	0.80	795.00	636.00
06/10/2019	Dardarian, Linda	Conference w/ R. Wendell re conference w/ Boston re settlement terms and drafting consent decree	0.20	795.00	159.00
06/10/2019	Dardarian, Linda	Draft memo to R. Wendell re same	0.10	795.00	79.50
06/13/2019	Dardarian, Linda	Draft memo to and from T. Murphy re status of negotiations	0.10	795.00	79.50
06/20/2019	Dardarian, Linda	Conference w/ A. Lee re curb ramp survey costs and methodologies	0.10	795.00	79.50
06/27/2019	Wendell, Raymond	Conference with L. Dardarian, T. Fox, T. Murphy, J. Lederman, A. Cederbaum, and K. Choe re; curb ramp survey.	0.50	495.00	247.50
06/27/2019	Wendell, Raymond	Conference with L. Dardarian re: consent decree.	0.10	495.00	49.50
06/27/2019	Wendell, Raymond	Draft consent decree.	4.40	495.00	2,178.00
06/27/2019	Dardarian, Linda	Conference w/ A. Lee re sidewalk and curb ramp surveys and parameters	0.50	795.00	397.50

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06/27/2019	Dardarian, Linda	Conference w/ A. Cederbaum, J. Lederman, K. Choe, T. Murphy, T. Fox and R. Wendell re curb ramp survey and request for production of documents	0.50	795.00	397.50
06/27/2019	Dardarian, Linda	Conference w/ R. Wendell re draft consent decree	0.10	795.00	79.50
06/27/2019	Dardarian, Linda	Strategy and research re settlement demand	0.50	795.00	397.50
06/27/2019	Dardarian, Linda	Draft memos to T. Fox and T. Murphy re same	0.20	795.00	159.00
06/27/2019	Dardarian, Linda	Draft correspondence to and from T. Murphy re City's financial information	0.10	795.00	79.50
06/28/2019	Wendell, Raymond	Draft consent decree.	3.40	495.00	1,683.00
07/02/2019	Wendell, Raymond	Draft consent decree.	2.40	495.00	1,188.00
07/05/2019	Wendell, Raymond	Draft consent decree.	4.20	495.00	2,079.00
07/08/2019	Wendell, Raymond	Draft consent decree.	6.40	495.00	3,168.00
07/09/2019	Dardarian, Linda	Review City's historic and future budgets and funding sources for curb ramp and installations in preparation for negotiations (1.2)	1.20	795.00	954.00
07/10/2019	Wendell, Raymond	Meet and confer with L. Dardarian, T. Fox, T. Murphy, M. Muehe, J. Lederman, and A. Cederbaum re: curb ramp settlement negotiations.	0.50	495.00	247.50
07/10/2019	Dardarian, Linda	Preparation for negotiation session with Boston (0.5). Lead conference with A. Cederbaum, J. Lederman, T. Fox, T. Murphy, R. Wendell and M. Muehe re. curb ramp installation numbers (0.5). Follow up with R. Wendell re. same (0.2). Draft correspondence to the City re same (1.1).	2.20	795.00	1,749.00
07/15/2019	Wendell, Raymond	Draft consent decree.	3.50	495.00	1,732.50
07/17/2019	Wendell, Raymond	Edit draft consent decree.	2.20	495.00	1,089.00
07/29/2019	Dardarian, Linda	Prepare for conference w/ J. Lederman and A. Cederbaum re curb ramp negotiations	0.40	795.00	318.00
07/29/2019	Dardarian, Linda	Review and edit consent decree	0.50	795.00	397.50

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07/29/2019	Dardarian, Linda	Lead conference w/ T. Fox, T. Murphy, J. Lederman and A. Cederbaum re curb ramp negotiations	0.20	795.00	159.00
07/31/2019	Dardarian, Linda	Conference w/ A. Lee re defendant's survey request for proposal	0.20	795.00	159.00
07/31/2019	Dardarian, Linda	Review and edit Consent Decree	0.10	795.00	79.50
08/01/2019	Dardarian, Linda	Review and edit draft Consent Decree	4.60	795.00	3,657.00
08/02/2019	Wendell, Raymond	Edit Consent Decree	2.20	495.00	1,089.00
08/02/2019	Dardarian, Linda	Memos to and from R. Wendell re Consent Decree terms	0.20	795.00	159.00
08/05/2019	Dardarian, Linda	Review draft request for proposal for curb ramp survey, and draft correspondence to City re same	2.20	795.00	1,749.00
08/05/2019	Dardarian, Linda	Conference w/ R. Wendell re Consent Decree terms	0.10	795.00	79.50
08/05/2019	Dardarian, Linda	Review and edit revised draft of Consent Decree	0.10	795.00	79.50
08/05/2019	Wendell, Raymond	Edit Consent Decree	1.10	495.00	544.50
08/06/2019	Dardarian, Linda	Finalize correspondence to Boston re curb ramp survey request for proposal	0.10	795.00	79.50
08/06/2019	Dardarian, Linda	Review and edit revised draft Consent Decree	0.80	795.00	636.00
08/06/2019	Wendell, Raymond	Memorandum to L. Dardarian re: City's draft request for proposals for curb ramp survey project.	0.30	495.00	148.50
08/07/2019	Dardarian, Linda	Finalize edit to Consent Decree	0.10	795.00	79.50
08/07/2019	Wendell, Raymond	Edit Consent Decree	0.60	495.00	297.00
08/09/2019	Dardarian, Linda	Review and respond to T. Fox re Consent Decree draft	0.10	795.00	79.50
08/12/2019	Dardarian, Linda	Draft memo to R. Wendell re curb ramp slope measurement techniques	0.10	795.00	79.50
08/13/2019	Dardarian, Linda	Review and edit final draft of Consent Decree	0.60	795.00	477.00
08/21/2019	Dardarian, Linda	Prepare for settlement conference w/ the City	0.20	795.00	159.00
08/22/2019	Dardarian, Linda	Prepare for call w/ City re settlement terms	0.30	795.00	238.50
08/22/2019	Wendell, Raymond	Phone call with L. Dardarian, T. Fox, T. Murphy, J. Lederman and A. Cederbaum re: draft Consent Decree	0.70	495.00	346.50

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08/22/2019	Wendell, Raymond	Debrief with L. Dardarian re: phone call with City re: draft consent decree.	0.10	495.00	49.50
08/22/2019	Wendell, Raymond	Research re: attorneys' fees under prior, similar settlements.	0.40	495.00	198.00
08/22/2019	Wendell, Raymond	Memorandum to L. Dardarian, T. Fox and T. Murphy re: attorneys' fees under prior similar settlements.	0.30	495.00	148.50
08/22/2019	Dardarian, Linda	Lead conference w/ T. Fox, T. Murphy, R. Wendell, A. Cederbaum, J. Lederman re Consent Decree terms	0.70	795.00	556.50
08/22/2019	Dardarian, Linda	Conference w/ R. Wendell re same	0.10	795.00	79.50
08/22/2019	Dardarian, Linda	Prepare for conference w/ City re settlement negotiations	0.30	795.00	238.50
08/28/2019	Dardarian, Linda	Review and revise draft correspondence to Boston re comparable rates, plus research re same	0.60	795.00	477.00
09/21/2019	Dardarian, Linda	Draft correspondence to R. Wendell re transition plan for pedestrian right of way	0.10	795.00	79.50
10/01/2019	Wendell, Raymond	Call with L. Dardarian, T. Fox, T. Murphy, A. Cederbaum and J. Lederman re: Boston's response to draft Consent Decree	0.90	495.00	445.50
10/01/2019	Dardarian, Linda	Prepare for conference w/ Boston re curb ramp negotiations	0.40	795.00	318.00
10/01/2019	Dardarian, Linda	Lead conference w/ T. Fox, T. Murphy, A. Cederbaum, Lederman and R. Wendell Boston's response to draft Consent Decree	0.90	795.00	715.50
10/01/2019	Dardarian, Linda	Lead conference w/ A. Cederbaum, J. Lederman, R. Wendell, T. Fox and T. Murphy re City's response to plaintiffs' settlement proposal	0.90	795.00	715.50
10/08/2019	Dardarian, Linda	Strategy re settlement w/ T. Fox, T. Murphy and R. Wendell	0.50	795.00	397.50
10/08/2019	Dardarian, Linda	Follow up w/ R. Wendell re same	0.10	795.00	79.50
10/08/2019	Dardarian, Linda	Prepare for same	0.10	795.00	79.50
10/08/2019	Wendell, Raymond	Conference with L. Dardarian, T. Murphy, and T. Fox re: consent decree negotiations.	0.50	495.00	247.50
10/15/2019	Dardarian, Linda	Review City's curb ramp offer	0.10	795.00	79.50

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10/15/2019	Dardarian, Linda	Review emails from T. Fox and T. Murphy re same	0.10	795.00	79.50
10/17/2019	Dardarian, Linda	Conference w/ R. Wendell, T. Fox, T. Murphy re City's curb ramp offer and assumptions	0.20	795.00	159.00
10/17/2019	Dardarian, Linda	Prepare counter proposal and talking points for call w/ City	0.50	795.00	397.50
10/17/2019	Dardarian, Linda	Lead conference w/ A. Cederbaum, J. Lederman, R. Wendell, T. Fox and T. Murphy re same	0.70	795.00	556.50
10/17/2019	Dardarian, Linda	Follow up w/ R. Wendell re same	0.10	795.00	79.50
10/17/2019	Wendell, Raymond	Strategy conference with L. Dardarian, T. Fox, and T. Murphy re: settlement negotiations.	0.20	495.00	99.00
10/17/2019	Wendell, Raymond	Call with L. Dardarian, T. Fox, T. Murphy, A. Cederbaum, and J. Lederman re: draft Consent Decree	0.70	495.00	346.50
10/29/2019	Wendell, Raymond	Draft motion for preliminary approval of settlement.	4.30	495.00	2,128.50
10/30/2019	Wendell, Raymond	Draft motion for preliminary approval of class action settlement.	3.00	495.00	1,485.00
11/01/2019	Wendell, Raymond	Draft motion for preliminary approval of class action settlement.	4.50	495.00	2,227.50
11/04/2019	Wendell, Raymond	Draft motion for preliminary approval of settlement.	1.40	495.00	693.00
11/07/2019	Wendell, Raymond	Edit complaint.	1.80	495.00	891.00
11/08/2019	Wendell, Raymond	Draft motion for preliminary approval of settlement.	2.30	495.00	1,138.50
11/11/2019	Dardarian, Linda	Conference w/ R. Wendell re status of negotiations	0.10	795.00	79.50
11/13/2019	Dardarian, Linda	Prepare for negotiation session w/ the City	0.30	795.00	238.50
11/13/2019	Dardarian, Linda	Lead conference w/ A. Cederbaum, J. Lederman, T. Fox, T. Murphy and R. Wendell re status of survey proposal, ADA coordinator hiring, negotiations re annual commitment, and Leadership change	0.50	795.00	397.50
11/13/2019	Wendell, Raymond	Conference with L. Dardarian, T. Fox, T. Murphy, A. Cederbaum, and J. Lederman re: further settlement negotiations.	0.50	495.00	247.50

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11/18/2019	Dardarian, Linda	Review Stantec proposal re curb ramp survey	0.50	795.00	397.50
11/18/2019	Dardarian, Linda	Review information re Stantec re curb ramp survey	0.20	795.00	159.00
11/19/2019	Dardarian, Linda	Review survey proposal	0.20	795.00	159.00
11/19/2019	Dardarian, Linda	Conference w/ T. Fox, T. Murphy and R. Wendell re same	0.40	795.00	318.00
11/19/2019	Dardarian, Linda	Draft correspondence to J. Lederman and A. Cederbaum re Stantec curb ramp survey proposal	2.50	795.00	1,987.50
11/20/2019	Wendell, Raymond	Call with L. Dardarian, T. Fox, T. Murphy, A. Lederman, J. Cederbaum, K. Choi, and J. Novella re: Stantec proposal for curb ramp survey.	0.70	495.00	346.50
11/20/2019	Kirkpatrick, Stuart	Research and draft memo to L. Dardarian re detectable warning requirements	0.80	225.00	180.00
11/20/2019	Dardarian, Linda	Lead conference w/ J. Lederman, A. Cederbaum, K. Choe, J. Novella, R. Wendell, T. Fox and T. Murphy re Stantec proposal and curb ramp negotiations	0.70	795.00	556.50
11/20/2019	Dardarian, Linda	Conference w/ S. Kirkpatrick re same	0.10	795.00	79.50
11/20/2019	Dardarian, Linda	Draft memo to T. Fox, T. Murphy and R. Wendell re same	0.20	795.00	159.00
11/20/2019	Dardarian, Linda	Research re same	0.20	795.00	159.00
11/21/2019	Dardarian, Linda	Draft correspondence to the City re further issues w/ Stantec study	0.30	795.00	238.50
12/03/2019	Wendell, Raymond	Conference with L. Dardarian, T. Fox, T. Murphy, A. Cederbaum, J. Lederman, and K. Choe re: curb ramp survey and settlement negotiations.	0.40	495.00	198.00
12/03/2019	Dardarian, Linda	Prepare for conference w/ A. Cederbaum, J. Lederman and K. Chao re curb ramp negotiations	0.10	795.00	79.50
12/03/2019	Dardarian, Linda	Lead conference w/ J. Lederman, A. Cederbaum, K. Chao, T. Fox, R. Wendell and T. Murphy re same	0.40	795.00	318.00
12/03/2019	Dardarian, Linda	Follow-up emails to and from co-counsel re same	0.10	795.00	79.50

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12/03/2019	Dardarian, Linda	Draft memo to S. Kirkpatrick re detectable warnings specifications	0.10	795.00	79.50
12/09/2019	Dardarian, Linda	Memos to and from T. Murphy re settlement status	0.10	795.00	79.50
12/09/2019	Dardarian, Linda	Prepare for conference w/ City re settlement, including reviewing detectable warning standards and regulations	0.30	795.00	238.50
12/10/2019	Dardarian, Linda	Lead conference w/ J. Lederman, A. Cederbaum, K. Chao, T. Murphy, T. Fox and R. Wendell re curb ramp annual commitment, prioritization, survey request for production and feedback and Consent Decree	0.60	795.00	477.00
12/10/2019	Dardarian, Linda	Follow up email to T. Fox and T. Murphy re same	0.10	795.00	79.50
12/10/2019	Dardarian, Linda	Research re ADA solutions for detectible warnings	0.10	795.00	79.50
12/10/2019	Wendell, Raymond	Conference with L. Dardarian, T. Murphy, T. Fox, A. Cederbaum, J. Lederman, and K. Choe re: annual commitment and curb ramp survey.	0.60	495.00	297.00
12/17/2019	Dardarian, Linda	Review City's feedback on survey and prepare for meeting w/ Boston re settlement negotiations	0.90	795.00	715.50
12/17/2019	Dardarian, Linda	Conference w/ A. Lee re same	0.20	795.00	159.00
12/18/2019	Wendell, Raymond	Conference with L. Dardarian, T. Fox, T. Murphy, K. Choe, J. Lederman, and A. Cederbaum re: curb ramp survey and edits to consent decree.	0.30	495.00	148.50
12/18/2019	Dardarian, Linda	Lead conference w/ K. Choe, J. Navarro, A. Cederbaum, J. Lederman, T. Fox, T. Murphy and R. Wendell re Stantec proposal for pedestrian right of way survey and revisions to Consent Decree	0.30	795.00	238.50
12/29/2019	Dardarian, Linda	Review and comment on City's revisions to Consent Decree	1.10	795.00	874.50
01/02/2020	Wendell, Raymond	Conference with L. Dardarian and T. Fox re: City's edits to draft Consent Decree	0.80	495.00	396.00

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01/02/2020	Wendell, Raymond	Investigate Boston's system for allowing citizens to request curb ramp repairs/report missing curb ramps.	2.40	495.00	1,188.00
01/02/2020	Dardarian, Linda	Conference w/ R. Wendell re City's edits to Consent Decree	0.10	795.00	79.50
01/02/2020	Dardarian, Linda	Memos to and from R. Wendell re curb ramp request system	0.20	795.00	159.00
01/02/2020	Dardarian, Linda	Prepare for call w/ City re Consent Decree terms	0.30	795.00	238.50
01/02/2020	Dardarian, Linda	Conference w/ R. Wendell and T. Fox re same	0.80	795.00	636.00
01/03/2020	Wendell, Raymond	Call with L. Dardarian, T. Fox, J. Lederman, K. Choe, and John ? re: City's edits to the draft consent decree (partial).	1.50	495.00	742.50
01/03/2020	Dardarian, Linda	Lead conference w/ J. Lederman, J. Navarro, K. Choe, T. Fox and R. Wendell re City's edits to consent decree	2.10	795.00	1,669.50
01/03/2020	Dardarian, Linda	Prepare for same	0.20	795.00	159.00
01/03/2020	Dardarian, Linda	Draft correspondence to J. Lederman and A. Cederbaum re same	0.90	795.00	715.50
01/03/2020	Dardarian, Linda	Draft memo to T. Fox, T. Murphy and R. Wendell re same	0.10	795.00	79.50
01/06/2020	Wendell, Raymond	Phone call to client C. Evans re: City's current 311 request system.	0.60	495.00	297.00
01/09/2020	Dardarian, Linda	Prepare for call w/ City re Consent Decree terms	0.80	795.00	636.00
01/10/2020	Wendell, Raymond	Conference with L. Dardarian, T. Murphy, and T. Fox re: City's proposed edits to consent decree.	0.70	495.00	346.50
01/10/2020	Wendell, Raymond	Conference with L. Dardarian re: City's proposed edits to consent decree and timing of new draft.	0.40	495.00	198.00
01/10/2020	Wendell, Raymond	Negotiate consent decree with L. Dardarian, T. Fox, T. Murphy, J. Lederman, A. Cederbaum, and J. Navarro	1.10	495.00	544.50
01/10/2020	Dardarian, Linda	Conference w/ T. Fox, T. Murphy, R. Wendell re curb ramp negotiations, and City's revisions to Consent Decree	0.70	795.00	556.50
01/10/2020	Dardarian, Linda	Conference w/ R. Wendell re same	0.10	795.00	79.50



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01/10/2020	Dardarian, Linda	Lead conference w/ J. Lederman, A. Cederbaum, J. Navarro re same	1.10	795.00	874.50
01/10/2020	Dardarian, Linda	Strategy re curb ramp request system and Decree terms re same	0.30	795.00	238.50
01/10/2020	Dardarian, Linda	Conference w/ R. Wendell re same	0.30	795.00	238.50
01/15/2020	Wendell, Raymond	Edit Consent Decree.	5.10	495.00	2,524.50
01/17/2020	Dardarian, Linda	Review and edit Consent Decree and draft comments to City on City's edits that will be discussed in upcoming call	2.50	795.00	1,987.50
01/21/2020	Dardarian, Linda	Conference w/ R. Wendell re edits to consent decree	0.20	795.00	159.00
01/21/2020	Wendell, Raymond	Edit consent decree.	3.40	495.00	1,683.00
01/23/2020	Wendell, Raymond	Settlement negotiations with L. Dardarian, T. Fox, T. Murphy, A. Cederbaum, J. Lederman, and J. Navarro re: next round of edits to draft Consent Decree.	0.90	495.00	445.50
01/23/2020	Dardarian, Linda	Prepare for call w/ Boston re disputed terms of consent decree	0.50	795.00	397.50
01/23/2020	Dardarian, Linda	Lead conference w/ J. Lederman, John (LNU), A. Cederbaum, T. Fox, T. Murphy and R. Wendell re same	0.90	795.00	715.50
01/23/2020	Dardarian, Linda	Conference w/ R. Wendell re follow up re same	0.10	795.00	79.50
02/10/2020	Dardarian, Linda	Conference w/ R. Wendell re Consent Decree negotiations status	0.10	795.00	79.50
02/10/2020	Dardarian, Linda	Draft correspondence to J. Lederman re same	0.10	795.00	79.50
02/27/2020	Dardarian, Linda	Conference w/ R. Wendell re consent decree finalization and status of negotiations	0.10	795.00	79.50
02/28/2020	Dardarian, Linda	Legal research re fee awards in D. Mass. for settlement negotiations	0.50	795.00	397.50
03/02/2020	Dardarian, Linda	Draft correspondence to J. Lederman and A. Cederbaum re status of negotiations	0.10	795.00	79.50
03/03/2020	Dardarian, Linda	Phone call to J. Lederman and A. Cederbaum re status of Consent Decree negotiations	0.10	795.00	79.50
03/03/2020	Dardarian, Linda	Conference w/ A. Cederbaum re same	0.40	795.00	318.00

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03/03/2020	Dardarian, Linda	Draft memo to team re same	0.20	795.00	159.00
03/03/2020	Dardarian, Linda	Follow up w/ co-counsel re same	0.10	795.00	79.50
03/05/2020	Valdez, Damon	Legal research re fee awards in D. Mass.	0.80	225.00	180.00
03/05/2020	Valdez, Damon	Draft memo to L. Dardarian re same	0.20	225.00	45.00
03/09/2020	Wendell, Raymond	Review and analyze City's edits to draft Consent Decree, and draft response re same	4.50	495.00	2,227.50
03/10/2020	Dardarian, Linda	Draft memo to City re Consent Decree and memo to T. Murphy, T. Fox & R. Wendell re same	0.10	795.00	79.50
03/12/2020	Wendell, Raymond	Edit draft consent decree.	3.80	495.00	1,881.00
03/13/2020	Dardarian, Linda	Review and analyze edits to consent decree.	0.60	795.00	477.00
03/13/2020	Wendell, Raymond	Edit draft consent decree.	2.40	495.00	1,188.00
03/16/2020	Wendell, Raymond	Strategize with L. Dardarian, T. Fox, and T. Murphy re: settlement negotiation, edits to draft consent decree.	0.90	495.00	445.50
03/16/2020	Dardarian, Linda	Conference with T. Fox, R. Wendell, & T. Murphy re City's edits to Consent Decree and our response to same	0.90	795.00	715.50
03/18/2020	Wendell, Raymond	Edit Consent Decree.	2.70	495.00	1,336.50
03/19/2020	Wendell, Raymond	Edit consent decree.	2.80	495.00	1,386.00
03/19/2020	Wendell, Raymond	Draft motion for preliminary approval of class action settlement.	1.00	495.00	495.00
03/23/2020	Dardarian, Linda	Draft memo to R. Wendell re Consent Decree edits	0.20	795.00	159.00
03/23/2020	Wendell, Raymond	Edit draft consent decree.	2.40	495.00	1,188.00
03/30/2020	Wendell, Raymond	Draft motion for preliminary approval of class action settlement.	1.40	495.00	693.00
04/13/2020	Dardarian, Linda	Review and edit revised draft Consent Decree	0.30	795.00	238.50
04/16/2020	Dardarian, Linda	Review and edit Consent Decree	0.20	795.00	159.00
04/27/2020	Dardarian, Linda	Review and edit Consent Decree (1.4); research and draft memo to T. Murphy and T. Fox re same (0.4)	1.80	795.00	1,431.00
04/28/2020	Dardarian, Linda	Conference with T. Fox re negotiations strategy (0.1).	0.10	795.00	79.50

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05/01/2020	Dardarian, Linda	Draft correspondence to J. Lederman & A. Cederbaum re status of negotiations	0.40	795.00	318.00
05/04/2020	Dardarian, Linda	Draft correspondence to J. Lederman & A. Cederbaum re status of negotiations (0.4).	0.40	795.00	318.00
05/11/2020	Dardarian, Linda	Draft memo to A. Cederbaum, J. Lederman re negotiations status.	0.10	795.00	79.50
06/03/2020	Dardarian, Linda	Draft correspondence to City re status of settlement negotiations and research re same.	0.50	795.00	397.50
06/04/2020	Dardarian, Linda	Exchange correspondence w/ A. Cederbaum and J. Lederman re status of negotiations (0.3).	0.30	795.00	238.50
06/08/2020	Dardarian, Linda	Draft correspondence to J. Lederman and A. Cederbaum re negotiations status	0.10	795.00	79.50
06/18/2020	Dardarian, Linda	Review draft Consent Decree and status of negotiations.	0.40	795.00	318.00
06/19/2020	Wendell, Raymond	Settlement negotiation call with L. Dardarian, T. Fox, T. Murphy, A. Cederbaum, and J. Lederman.	0.80	495.00	396.00
06/19/2020	Dardarian, Linda	Preparation for conference with City re Consent Decree negotiations (0.1). Lead conference with R. Wendell, T. Fox, T. Murphy, A. Cederbaum, J. Lederman re same (0.8)	0.90	795.00	715.50
06/24/2020	Dardarian, Linda	Review Consent Decree and curb ramp standards to preparation for call with the City re negotiations.	0.90	795.00	715.50
06/25/2020	Wendell, Raymond	(Partial) Settlement negotiation call with L. Dardarian, T. Fox, T. Murphy, A. Cederbaum, and J. Lederman.	1.20	495.00	594.00
06/25/2020	Dardarian, Linda	Lead review Consent Decree and status of ramp survey with A. Cederbaum, J. Lederman, R. Wendell, T. Fox, T. Murphy (1.5); memo to R. Wendell, T. Fox, and T. Murphy re follow up re same (0.1); review prior negotiations history in preparation for same (0.3)	1.90	795.00	1,510.50
07/01/2020	Wendell, Raymond	Strategy with L. Dardarian and T. Murphy re: edits to draft consent decree.	0.40	495.00	198.00

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07/01/2020	Dardarian, Linda	Review potential edits to Consent Decree (0.3). Conference with T. Murphy & R. Wendell re same (0.4). Review pedestrian right of way survey tool for completeness (0.1).	0.80	795.00	636.00
07/02/2020	Dardarian, Linda	Review and edit Consent Decree (1.0); draft correspondence to the City re pedestrian of right of way survey items missing from Stantec inventory (0.5)	1.50	795.00	1,192.50
07/06/2020	Dardarian, Linda	Review and edit Consent Decree and draft memo to the City re same.	0.20	795.00	159.00
07/14/2020	Wendell, Raymond	Negotiation with L. Dardarian, T. Fox, T. Murphy, A. Cederbaum, and J. Lederman re: consent decree.	1.10	495.00	544.50
07/14/2020	Wendell, Raymond	Strategy with L. Dardarian, T. Fox, and T. Murphy re: settlement negotiations.	0.40	495.00	198.00
07/14/2020	Dardarian, Linda	Preparation for conference with the City re consent decree terms and curb ramp survey (0.4); lead conference with T. Fox, T. Murphy, R. Wendell, A. Cederbaum and J. Lederman re survey metrics and Consent Decree terms (1.1); strategy with T. Fox, T. Murphy, and R. Wendell re negotiations re curb ramp request system and maintenance (0.4); draft correspondence to J. Lederman and A. Cederbaum re alterations to pedestrian right of way (0.1)	2.00	795.00	1,590.00
07/15/2020	Dardarian, Linda	Draft correspondence to the City re alterations that trigger curb ramp installations.	0.70	795.00	556.50
07/23/2020	Wendell, Raymond	Settlement negotiations with L. Dardarian, T. Fox, T. Murphy, J. Lederman, and A. Cederbaum.	1.40	495.00	693.00
07/23/2020	Dardarian, Linda	Lead conference w/ J. Lederman, A. Cederbaum, R. Wendell, T. Murphy and T. Fox re Consent Decree negotiations (1.4); prepare for same (0.4)	1.80	795.00	1,431.00
07/31/2020	Dardarian, Linda	Review and edit Consent Decree	0.10	795.00	79.50

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08/03/2020	Dardarian, Linda	Review and edit consent decree.	1.40	795.00	1,113.00
08/04/2020	Dardarian, Linda	Review and edit consent decree.	0.40	795.00	318.00
08/05/2020	Dardarian, Linda	Revise Decree and draft correspondence to J. Lederman and A. Cederbaum re Consent Decree negotiations (0.3).	0.30	795.00	238.50
08/17/2020	Dardarian, Linda	Review City edits to Consent Decree and draft memo to A. Cedarbaum and J. Lederman in response.	0.20	795.00	159.00
08/19/2020	Dardarian, Linda	Review status of negotiations (0.2); lead conference with T. Murphy, J. Lederman, A. Cederbaum, T. Murphy and R. Wendell re Consent Decree negotiations and curb ramp survey (0.4); draft memo to T. Fox re same (0.3).	0.90	795.00	715.50
08/19/2020	Wendell, Raymond	Settlement negotiation with L. Dardarian, T. Murphy, J. Lederman, and A. Cederbaum.	0.40	495.00	198.00
09/18/2020	Wendell, Raymond	Settlement negotiations with L. Dardarian, T. Fox, T. Murphy, A. Cederbaum, and J. Lederman.	1.10	495.00	544.50
09/18/2020	Dardarian, Linda	Preparation for negotiation with City and outline points for same (0.7). Lead conference with J. Lederman, A. Cederbaum, T. Fox, R. Wendell and T. Murphy re Consent Decree terms, survey status and annual commitment (1.1).	1.80	795.00	1,431.00
09/18/2020	Dardarian, Linda	Draft correspondence to J. Lederman and A. Cederbaum re ramps by private developers (0.1). Draft memo to T. Fox and T. Murphy re annual commitment and settlement strategy (0.2).	0.30	795.00	238.50
09/21/2020	Dardarian, Linda	Draft correspondence to J. Lederman & A. Cederbaum re survey data.	0.20	795.00	159.00
09/25/2020	Dardarian, Linda	Preparation for negotiations re City's revised annual commitment proposal and draft memo to T. Fox re same.	1.00	795.00	795.00

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09/25/2020	Dardarian, Linda	Draft correspondence to A. Cedar and J. Lederman re status of curb ramp survey.	0.10	795.00	79.50
09/28/2020	Wendell, Raymond	Settlement negotiations with L. Dardarian, T. Fox, T. Murphy, J. Lederman, and A. Cederbaum.	0.40	495.00	198.00
09/28/2020	Dardarian, Linda	Lead conference with J. Lederman, A. Cederbaum, T. Fox, T. Murphy and R. Wendell re counter-proposal for annual commitment (0.4); review and edit draft Consent Decree re annual commitment and meet and confer provisions for same (2.5).	2.90	795.00	2,305.50
09/29/2020	Dardarian, Linda	Edit Consent Decree and draft memo to co-counsel re same (0.5); draft memo to City re same (0.1).	0.60	795.00	477.00
09/29/2020	Wendell, Raymond	Review edits to draft consent decree.	0.30	495.00	148.50
10/15/2020	Dardarian, Linda	Lead conference with A. Cederbaum, J. Lederman, T. Fox, R. Wendell and T. Murphy re curb ramp commitment (0.4); preparation for same (0.4).	0.80	795.00	636.00
10/15/2020	Wendell, Raymond	Settlement negotiations with L. Dardarian, T. Fox, T. Murphy, J. Lederman, and A. Cederbaum.	0.40	495.00	198.00
10/15/2020	Wendell, Raymond	Review Boston's edits to Consent Decree.	0.50	495.00	247.50
10/21/2020	Dardarian, Linda	Review City's edits to draft agreement and draft memo to co-counsel re same	0.10	795.00	79.50
10/23/2020	Wendell, Raymond	Review edits to Consent Decree.	0.50	495.00	247.50
10/23/2020	Dardarian, Linda	Strategy re settlement (0.1); draft memo to R. Wendell, T. Murphy and T. Fox re same (0.4).	0.50	795.00	397.50
10/25/2020	Dardarian, Linda	Draft correspondence to City re revisions of Consent Decree, and revise same.	0.50	795.00	397.50
10/26/2020	Dardarian, Linda	Lead conference with R. Wendell, T. Fox, T. Murphy, A. Cederbaum and J. Lederman re consent decree and annual commitment.	0.50	795.00	397.50

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10/26/2020	Wendell, Raymond	Settlement negotiations with L. Dardarian, T. Fox, T. Murphy, J. Lederman, and A. Cederbaum.	0.50	495.00	247.50
10/26/2020	Wendell, Raymond	Conference with L. Dardarian, T. Fox, T. Murphy, A. Cederbaum and J. Lederman re Consent Decree negotiations	0.50	495.00	247.50
11/04/2020	Dardarian, Linda	Draft correspondence with A. Cederbaum and J. Lederman re status of negotiations.	0.10	795.00	79.50
11/05/2020	Dardarian, Linda	Preparation for conference with City re claimant payments (0.3). Lead conference with A. Cederbaum and J. Lederman re same (0.4). Memo to K. Burzynski re same (0.1). Conference with K. Burzynski re same (0.2).	1.00	795.00	795.00
11/10/2020	Dardarian, Linda	Draft correspondence to J. Lederman & A. Cederbaum re damages for named plaintiffs.	2.30	795.00	1,828.50
11/17/2020	Dardarian, Linda	Preparation for conference with the City re Plaintiff damages claims (0.1). Lead conference with J. Lederman, A. Cederbaum, T. Fox and T. Murphy re same (0.5). Strategy and research re fee demand	2.80	795.00	2,226.00
11/17/2020	Dardarian, Linda	Draft correspondence to City re Plaintiffs' "ballpark" fees.	1.00	795.00	795.00
11/24/2020	Wendell, Raymond	Strategy with L. Dardarian re: attorneys' fee demand letter.	0.20	495.00	99.00
11/24/2020	Dardarian, Linda	Conference with R. Wendell re fee negotiations (0.2). Draft memo to R. Wendell re same (0.2).	0.40	795.00	318.00
11/25/2020	Wendell, Raymond	Draft attorneys' fees demand letter.	2.30	495.00	1,138.50
11/25/2020	Dardarian, Linda	Draft memos to R. Wendell re fee negotiations.	0.20	795.00	159.00
11/30/2020	Wendell, Raymond	Draft attorneys' fees demand letter.	3.20	495.00	1,584.00
12/01/2020	Wendell, Raymond	Settlement negotiations with L. Dardarian, T. Fox, T. Murphy, A. Cederbaum, and J. Lederman re: class representative damages and attorneys' fees.	0.60	495.00	297.00
12/01/2020	Wendell, Raymond	Draft attorneys' fees demand letter.	3.00	495.00	1,485.00

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12/01/2020	Dardarian, Linda	Preparation for conference w/ City re fees and damages (0.2). Lead conference with A. Cederbaum & J. Lederman re damages and fee negotiations (0.5). Draft memos to R. Wendell, T. Murphy and T. Fox re same (0.2).	0.90	795.00	715.50
12/02/2020	Wendell, Raymond	Draft attorneys' fees demand letter.	2.20	495.00	1,089.00
12/03/2020	Wendell, Raymond	Draft attorneys' fees demand letter to City.	5.20	495.00	2,574.00
12/10/2020	Kirkpatrick, Stuart	Fact research for R. Wendell re market rates for plaintiffs' fee request and draft memo re same	1.50	225.00	337.50
12/11/2020	Kirkpatrick, Stuart	Additional fact research and drafting memo to R. Wendell re market rates for plaintiffs' fee request	0.80	225.00	180.00
12/14/2020	Wendell, Raymond	Draft attorneys' fees demand letter to City.	7.20	495.00	3,564.00
12/15/2020	Dardarian, Linda	Draft memo to R. Wendell re fee demand (0.2). Review and edit correspondence to the City re attorneys' fee claim (1.0).	1.20	795.00	954.00
12/15/2020	Wendell, Raymond	Draft attorneys' fees demand letter to City.	6.30	495.00	3,118.50
12/16/2020	Wendell, Raymond	Edit attorneys' fees demand letter to City.	2.40	495.00	1,188.00
12/16/2020	Dardarian, Linda	Review and edit correspondence to Defendants re fee demand.	0.40	795.00	318.00
12/16/2020	Dardarian, Linda	Draft correspondence to the City re status of negotiations (0.1). Draft memo to R. Wendell re same (0.1).	0.20	795.00	159.00
12/17/2020	Wendell, Raymond	Edit attorneys' fees demand letter to City.	1.70	495.00	841.50
12/18/2020	Wendell, Raymond	Memoranda to and from L. Dardarian, T. Fox, and T. Murphy re: attorneys' fees demand letter.	0.40	495.00	198.00
12/18/2020	Wendell, Raymond	Edit attorneys' fees demand letter.	0.70	495.00	346.50
12/21/2020	Wendell, Raymond	Draft motion for preliminary approval of class action settlement.	1.80	495.00	891.00
12/22/2020	Wendell, Raymond	Finalize attorneys' fees demand letter to City's counsel.	1.80	495.00	891.00



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12/23/2020	Wendell, Raymond	Draft motion for preliminary approval of class action settlement.	7.00	495.00	3,465.00
01/05/2021	Dardarian, Linda	Prepare evidence in support of fee petition	1.50	795.00	1,192.50
01/08/2021	Wendell, Raymond	Settlement negotiations with L. Dardarian, T. Fox, T. Murphy, A. Cederbaum, and J. Lederman re: attorneys' fees.	0.80	495.00	396.00
01/08/2021	Wendell, Raymond	Debrief with L. Dardarian re: City's response to attorneys' fees demand letter.	0.20	495.00	99.00
01/08/2021	Dardarian, Linda	Conference w/ R. Wendell re City's response to plaintiffs' fee proposal	0.20	795.00	159.00
01/15/2021	Dardarian, Linda	Draft correspondence to City re Plaintiffs.' fee demand.	2.90	795.00	2,305.50
01/19/2021	Dardarian, Linda	Draft, review, and edit correspondence to City re fee negotiations.	2.20	795.00	1,749.00
02/01/2021	Dardarian, Linda	Review correspondence from City re fee negotiations (0.1). Draft correspondence to A. Cederbaum, J. Lederman, T. Murphy and T. Fox re same (0.1).	0.20	795.00	159.00
02/02/2021	Dardarian, Linda	Draft correspondence to J. Lederman & A. Cederbaum re negotiations (0.1). Strategy and draft new consent decree language(0.6).	0.70	795.00	556.50
02/16/2021	Dardarian, Linda	Draft correspondence to A. Cederbaum and J. Lederman re status of negotiations.	0.10	795.00	79.50
02/22/2021	Dardarian, Linda	Phone call to A. Cederbaum & J. Lederman re status of negotiations (0.1). Draft memo to same re same (0.1). Propose alternative fee language for settlement (0.1).	0.30	795.00	238.50
02/23/2021	Dardarian, Linda	Draft correspondence to A. Cederbaum and J. Lederman re status of negotiations and edits to Consent Decree (0.3).	0.30	795.00	238.50
02/25/2021	Dardarian, Linda	Correspondence to and from J. Lederman re negotiations.	0.10	795.00	79.50
03/03/2021	Wendell, Raymond	Settlement negotiations with L. Dardarian, T. Fox, T. Murphy, A. Cederbaum, and J. Lederman re: attorneys' fees, survey.	0.70	495.00	346.50

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Date	Attorney	Description	Hours	Rate	Amount
03/03/2021	Dardarian, Linda	Preparation for conference with the City re fee negotiations (0.2). Lead conference with J. Lederman, A. Cederbaum, T. Murphy, R. Wendell and T. Fox re finalizing consent decree fee negotiations (0.7).	0.90	795.00	715.50
03/17/2021	Wendell, Raymond	Settlement negotiations with L. Dardarian, T. Fox, T. Murphy, A. Cederbaum, and J. Lederman re: attorneys' fees, survey.	0.50	495.00	247.50
03/17/2021	Wendell, Raymond	Draft motion for preliminary approval of class action settlement.	0.90	495.00	445.50
03/17/2021	Dardarian, Linda	Preparation for call with City re finalizing negotiations (0.1). Lead conference with J. Lederman, A. Cederbaum, T. Fox, T. Murphy and drw re same (0.5). Strategy re follow-up (0.2).	0.80	795.00	636.00
03/18/2021	Wendell, Raymond	Draft motion for preliminary approval of class action settlement.	4.40	495.00	2,178.00
03/19/2021	Wendell, Raymond	Strategy with L. Dardarian, T. Fox, and T. Murphy re: attorneys' fees petition, monitoring fees proposal.	0.50	495.00	247.50
03/19/2021	Wendell, Raymond	Draft motion for preliminary approval of class action settlement.	2.40	495.00	1,188.00
03/19/2021	Dardarian, Linda	Conference with T. Fox, T. Murphy, and R. Wendell re fee negotiation strategy (0.5). Draft correspondence to City re same and revise Consent Decree re same (0.5).	1.00	795.00	795.00
03/22/2021	Wendell, Raymond	Draft motion for preliminary approval of class action settlement.	6.90	495.00	3,415.50
03/23/2021	Wendell, Raymond	Draft motion for preliminary approval of class action settlement.	6.50	495.00	3,217.50
03/23/2021	Dardarian, Linda	Review and edit Consent Decree and draft correspondence to City re same	0.70	795.00	556.50
03/24/2021	Dardarian, Linda	Review and edit Consent Decree and draft correspondence to City re same	0.70	795.00	556.50

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03/25/2021	Dardarian, Linda	Review and edit draft complaint, and draft memo to R. Wendell re same	1.00	795.00	795.00
03/26/2021	Wendell, Raymond	Memorandum to L. Dardarian re: draft complaint.	0.40	495.00	198.00
03/26/2021	Wendell, Raymond	Edit complaint.	1.20	495.00	594.00
03/26/2021	Dardarian, Linda	Review and edit preliminary approval briefing	1.00	795.00	795.00
03/26/2021	Dardarian, Linda	Draft memo to R. Wendell re class notice and class counsel declaration	0.20	795.00	159.00
03/29/2021	Wendell, Raymond	Settlement negotiations with L. Dardarian, T. Murphy, A. Cederbaum, and J. Lederman re: attorneys' fees, survey.	0.80	495.00	396.00
03/29/2021	Wendell, Raymond	Edit motion for preliminary approval of class action settlement.	1.40	495.00	693.00
03/29/2021	Wendell, Raymond	Draft memorandum to T. Fox and T. Murphy re: preliminary approval process.	0.80	495.00	396.00
03/29/2021	Dardarian, Linda	Lead conference w/ J. Lederman, A. Cederbaum, T. Fox, T. Murphy and R. Wendell re Consent Decree negotiations and preliminary approval	0.80	795.00	636.00
03/29/2021	Dardarian, Linda	Prepare for same	0.20	795.00	159.00
03/30/2021	Dardarian, Linda	Correspondence to the City re dispute resolution fees	0.50	795.00	397.50
03/30/2021	Dardarian, Linda	Revise Consent Decree re current status of terms and fees provisions	0.30	795.00	238.50
03/31/2021	Wendell, Raymond	Strategy with L. Dardarian, T. Fox, and T. Murphy re: fee provisions for monitoring and dispute resolution.	0.50	495.00	247.50
03/31/2021	Wendell, Raymond	Edit Consent Decree	0.60	495.00	297.00
03/31/2021	Wendell, Raymond	Memoranda to and from L. Dardarian, T. Fox, and T. Murphy re: dispute resolution fees.	0.40	495.00	198.00
03/31/2021	Dardarian, Linda	Review and edit correspondence to defendants re monitoring fees	0.40	795.00	318.00
03/31/2021	Dardarian, Linda	Conference w/ T. Murphy, R. Wendell and T. Fox re same	0.40	795.00	318.00
03/31/2021	Dardarian, Linda	Revise Consent Decree re same	0.10	795.00	79.50

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04/01/2021	Dardarian, Linda	Revise correspondence to City re Consent Decree and fees	0.10	795.00	79.50
04/05/2021	Dardarian, Linda	Review Access Board update on pedestrian right of way access standards	0.20	795.00	159.00
04/07/2021	Dardarian, Linda	Draft memo to R. Wendell regarding fee negotiations	0.10	795.00	79.50
04/08/2021	Dardarian, Linda	Preparation for conference w/ City regarding Consent Decree (0.2). Lead conference with A. Cederbaum, J. Lederman, R. Wendell, T. Fox, and T. Murphy regarding same (0.6).	0.80	795.00	636.00
04/08/2021	Dardarian, Linda	Strategy regarding next steps in negotiations with T. Fox, T. Murphy and R. Wendell (.4)	0.40	795.00	318.00
04/08/2021	Dardarian, Linda	Draft memo to A. Cederbaum and J. Lederman regarding same	1.10	795.00	874.50
04/08/2021	Wendell, Raymond	Settlement negotiations with L. Dardarian, T. Murphy, A. Cederbaum, and J. Lederman re: attorneys' fees, monitoring.	0.60	495.00	297.00
04/08/2021	Wendell, Raymond	Strategy with L. Dardarian, T. Fox, and T. Murphy re: settlement negotiations (attorneys' fees and monitoring).	0.40	495.00	198.00
04/09/2021	Dardarian, Linda	Revise correspondence to City regarding Consent Decree negotiations	0.10	795.00	79.50
04/12/2021	Wendell, Raymond	Draft notice of class action settlement.	1.40	495.00	693.00
04/13/2021	Dardarian, Linda	Review City's edits to consent decree	0.10	795.00	79.50
04/13/2021	Dardarian, Linda	Conference with T. Fox, T. Murphy, and R. Wendell regarding same	0.20	795.00	159.00
04/13/2021	Dardarian, Linda	Conference with co-counsel, A. Cederbaum and J. Lederman regarding same	0.80	795.00	636.00
04/13/2021	Dardarian, Linda	Draft memo to R. Wendell regarding class notice	0.10	795.00	79.50
04/13/2021	Wendell, Raymond	Strategy with L. Dardarian, T. Fox, and T. Murphy re: fee provisions for monitoring and dispute resolution.	0.20	495.00	99.00
04/13/2021	Wendell, Raymond	Settlement negotiations with L. Dardarian, T. Murphy, A. Cederbaum, and J. Lederman re: attorneys' fees, monitoring.	0.80	495.00	396.00

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04/14/2021	Dardarian, Linda	Revise Consent Decree and draft memo to city regarding same	1.20	795.00	954.00
04/16/2021	Wendell, Raymond	Draft notice of class action settlement.	5.00	495.00	2,475.00
04/26/2021	Wendell, Raymond	Draft class notice.	3.40	495.00	1,683.00
04/26/2021	Wendell, Raymond	Draft proposed order granting preliminary approval of class action settlement.	1.50	495.00	742.50
04/27/2021	Wendell, Raymond	Edit notice of class action settlement.	0.40	495.00	198.00
04/27/2021	Dardarian, Linda	Review and edit class notice	0.60	795.00	477.00
04/27/2021	Dardarian, Linda	Review and respond to correspondence from City regarding final edits to Consent Decree, and review edits	0.10	795.00	79.50
04/27/2021	Dardarian, Linda	Draft correspondence to Co-counsel regarding same	0.10	795.00	79.50
04/28/2021	Dardarian, Linda	Review and respond to email regarding class notice distribution	0.10	795.00	79.50
04/28/2021	Dardarian, Linda	Draft memo to R. Wendell re finalizing Consent Decree	0.10	795.00	79.50
04/28/2021	Wendell, Raymond	Cleanup edits to Consent Decree.	2.90	495.00	1,435.50
04/29/2021	Wendell, Raymond	Cleanup edits to Consent Decree.	2.20	495.00	1,089.00
04/30/2021	Wendell, Raymond	Memoranda to and from L. Dardarian, T. Fox, and T. Murphy re: preparing to file complaint, motion for preliminary approval.	1.20	495.00	594.00
04/30/2021	Wendell, Raymond	Cleanup edits to Consent Decree.	0.60	495.00	297.00
05/03/2021	Kirkpatrick, Stuart	Research and draft memo to L. Dardarian re community outreach re curb ramp settlements	0.40	225.00	90.00
05/03/2021	Dardarian, Linda	Conference with J. Lederman, A. Cederbaum and T. Fox regarding finalizing consent decree, exhibits, and approval process	0.60	795.00	477.00
05/03/2021	Dardarian, Linda	Draft memo to T. Murphy, R. Wendell, and T. Fox regarding same	0.10	795.00	79.50
05/03/2021	Dardarian, Linda	Draft memos to R. Wendell and S. Kirkpatrick regarding joint statement regarding settlement	0.20	795.00	159.00

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05/04/2021	Dardarian, Linda	Review and edit Consent Decree exhibits and draft email to T. Fox, T. Murphy and R. Wendell regarding same	0.30	795.00	238.50
05/04/2021	Wendell, Raymond	Strategy re: timeline for obtaining court approval of settlement.	2.40	495.00	1,188.00
05/04/2021	Wendell, Raymond	Strategy with T. Fox and T. Murphy re: preparing to file complaint and motion for preliminary approval.	0.50	495.00	247.50
05/04/2021	Wendell, Raymond	Draft memorandum to L. Dardarian, T. Fox, and T. Murphy re: timeline for obtaining court approval of settlement.	1.40	495.00	693.00
05/04/2021	Wendell, Raymond	Draft memorandum to L. Dardarian re: list of specific locations with missing or noncompliant curb ramps.	0.60	495.00	297.00
05/04/2021	Wendell, Raymond	Correspondence with J. Lederman and A. Cederbaum re: edits to consent decree, class notice, and complaint.	0.50	495.00	247.50
05/04/2021	Wendell, Raymond	Draft motion for preliminary approval of class action settlement and supporting documents	2.00	495.00	990.00
05/05/2021	Wendell, Raymond	Draft motion for preliminary approval of class action settlement and proposed orders.	2.10	495.00	1,039.50
05/06/2021	Wendell, Raymond	Draft proposed order granting final approval of class action settlement and entering final judgment.	1.90	495.00	940.50
05/07/2021	Dardarian, Linda	Review and edit Consent Decree exhibits	0.90	795.00	715.50
05/10/2021	Wendell, Raymond	Draft memorandum to L. Dardarian re: proposed schedule for settlement approval, notice process, and attorneys' fees briefing.	2.30	495.00	1,138.50
05/11/2021	Wendell, Raymond	Edit proposed order granting preliminary approval of class action settlement.	0.80	495.00	396.00
05/11/2021	Wendell, Raymond	Edit order granting final approval of class action settlement and final judgment.	0.50	495.00	247.50

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05/11/2021	Wendell, Raymond	Draft memorandum to T. Fox and T. Murphy re: schedule for settlement approval, notice process, and attorneys' fees briefing.	0.80	495.00	396.00
05/14/2021	Wendell, Raymond	Draft memorandum to L. Dardarian re: finalizing consent decree, complaint, and preliminary approval motion.	0.30	495.00	148.50
05/14/2021	Wendell, Raymond	Draft Declaration of Linda M. Dardarian in Support of Motion for Preliminary Approval of Class Action Settlement.	3.20	495.00	1,584.00
05/17/2021	Wendell, Raymond	Draft correspondence to City re: edits to consent decree.	0.40	495.00	198.00
05/17/2021	Dardarian, Linda	Review final edits to Consent Decree, exhibits and draft memo to R. Wendell re same	0.20	795.00	159.00
05/18/2021	Dardarian, Linda	Review final edits to consent decree and exhibits, and draft memo to R. Wendell regarding same.	0.20	795.00	159.00
05/18/2021	Dardarian, Linda	Preparation for conference with the City regarding finalizing Consent Decree	0.10	795.00	79.50
05/18/2021	Dardarian, Linda	Lead conference with A. Cederbaum, J. Lederman, T. Murphy, T. Fox, and R. Wendell regarding finalizing Consent Decree	0.40	795.00	318.00
05/18/2021	Dardarian, Linda	Conference with R. Wendell regarding same and preliminary approval briefing	0.20	795.00	159.00
05/18/2021	Wendell, Raymond	Negotiations with A. Cederbaum, J. Lederman, L. Dardarian, T. Fox, and T. Murphy re: finalizing consent decree and submitting for court approval.	0.40	495.00	198.00
05/18/2021	Wendell, Raymond	Strategy with L. Dardarian re: finalizing consent decree and submitting for court approval.	0.20	495.00	99.00
05/19/2021	Dardarian, Linda	Review edits to Preliminary Approval Motion	0.20	795.00	159.00
05/19/2021	Wendell, Raymond	Edit motion for preliminary approval of class action settlement.	3.20	495.00	1,584.00
05/19/2021	Wendell, Raymond	Memoranda to and from L. Dardarian, T. Fox, and T. Murphy re: motion for preliminary approval of class action settlement.	1.10	495.00	544.50

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05/19/2021	Wendell, Raymond	Draft Declaration of Linda M. Dardarian in Support of Motion for Preliminary Approval of Class Action Settlement.	0.50	495.00	247.50
05/20/2021	Dardarian, Linda	Review and edit preliminary approval motion	0.20	795.00	159.00
05/20/2021	Wendell, Raymond	Edit Motion for Preliminary Approval of Class Action Settlement.	0.60	495.00	297.00
05/20/2021	Wendell, Raymond	Correspondence with City re: Joint Motion for Preliminary Approval of Class Action Settlement.	0.40	495.00	198.00
05/20/2021	Wendell, Raymond	Finalize Consent Decree.	0.30	495.00	148.50
05/20/2021	Wendell, Raymond	Finalize Complaint.	0.50	495.00	247.50
05/21/2021	Kirkpatrick, Stuart	Cite check and edit Complaint for R. Wendell	1.80	225.00	405.00
05/21/2021	Wendell, Raymond	Draft memorandum to S. Grimes and S. Kirkpatrick re: finalizing complaint.	0.30	495.00	148.50
05/21/2021	Wendell, Raymond	Draft Declaration of Linda M. Dardarian in Support of Motion for Preliminary Approval of Class Action Settlement.	4.00	495.00	1,980.00
05/21/2021	Wendell, Raymond	Draft declaration of Michael Muehe in Support of Preliminary Approval of Class Action Settlement.	1.40	495.00	693.00
05/21/2021	Wendell, Raymond	Draft joint motion to exceed page limit for motion for preliminary approval.	1.10	495.00	544.50
05/21/2021	Dardarian, Linda	Review and edit L. Dardarian declaration in support of Preliminary Approval	0.60	795.00	477.00
05/21/2021	Dardarian, Linda	Review motion for leave to exceed page limit	0.10	795.00	79.50
05/21/2021	Dardarian, Linda	Review and edit Plaintiff declarations in support of preliminary approval	0.20	795.00	159.00
05/21/2021	Dardarian, Linda	Review evidence in support of fee petition	0.40	795.00	318.00
05/25/2021	Wendell, Raymond	Draft declaration of Elaine Hamilton in Support of Preliminary Approval of Class Action Settlement.	0.70	495.00	346.50
05/25/2021	Wendell, Raymond	Draft declaration of Crystal Evans in Support of Preliminary Approval of Class Action Settlement.	0.60	495.00	297.00



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05/25/2021	Wendell, Raymond	Draft declaration of Colleen Flanagan in Support of Preliminary Approval of Class Action Settlement.	0.70	495.00	346.50
05/25/2021	Wendell, Raymond	Edit Declaration of Linda M. Dardarian in Support of Motion for Preliminary Approval of Class Action Settlement.	1.20	495.00	594.00
05/25/2021	Wendell, Raymond	Negotiations with A. Cederbaum, J. Lederman, L. Dardarian, T. Fox, and T. Murphy re: finalizing consent decree and submitting for court approval.	0.20	495.00	99.00
05/25/2021	Wendell, Raymond	Strategy with L. Dardarian re: finalizing consent decree and submitting for court approval.	0.20	495.00	99.00
05/25/2021	Wendell, Raymond	Edit list of organizational recipients of class notice (Exhibit D to Consent Decree).	0.70	495.00	346.50
05/25/2021	Wendell, Raymond	Draft memorandum to T. Fox and T. Murphy re: finalizing complaint and motion for preliminary approval.	0.40	495.00	198.00
05/25/2021	Dardarian, Linda	Lead conference with J. Lederman, T. Fox, T. Murphy, R. Wendell, and A. Cederbaum regarding finalizing Consent Decree	0.20	795.00	159.00
05/25/2021	Dardarian, Linda	Conference with R. Wendell regarding same and Motion for preliminary approval	0.20	795.00	159.00
05/26/2021	Wendell, Raymond	Edit Consent Decree.	0.50	495.00	247.50
05/26/2021	Dardarian, Linda	Review pleadings for filing complaint, draft memo to S. Grimes and S. Kirkpatrick regarding same	0.10	795.00	79.50
05/26/2021	Dardarian, Linda	Review City edits to Decree and exhibits, draft memo to team regarding same	0.30	795.00	238.50
05/26/2021	Kirkpatrick, Stuart	Draft Pro Hac Vice motions for L. Dardarian and R. Wendell admission to District of Massachusetts	0.50	225.00	112.50
06/01/2021	Dardarian, Linda	Lead conference with J. Lederman, A. Cederbaum, T. Fox, and R. Wendell regarding finalizing consent Decree and Motion for Preliminary approval	0.40	795.00	318.00

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06/01/2021	Dardarian, Linda	Conference with R. Wendell regarding finalizing consent Decree and Motion for Preliminary approval	0.10	795.00	79.50
06/01/2021	Dardarian, Linda	Revise Consent Decree and finalize exhibits	0.10	795.00	79.50
06/01/2021	Dardarian, Linda	Draft correspondence to T. Murphy regarding declarations in support of preliminary approval	0.10	795.00	79.50
06/01/2021	Wendell, Raymond	Negotiations with A. Cederbaum, J. Lederman, L. Dardarian, T. Fox, and T. Murphy re: finalizing consent decree and submitting for court approval.	0.40	495.00	198.00
06/01/2021	Wendell, Raymond	Debrief with L. Dardarian re: finalizing consent decree and submitting for court approval.	0.10	495.00	49.50
06/03/2021	Dardarian, Linda	Revise pleadings, Complaint, cover sheet and summons	0.60	795.00	477.00
06/03/2021	Dardarian, Linda	Review and comment on proposed ADA coordinator's qualifications.	0.40	795.00	318.00
06/08/2021	Dardarian, Linda	Review and edit class rep declarations	0.30	795.00	238.50
06/08/2021	Dardarian, Linda	Draft memo to T. Murphy regarding same	0.10	795.00	79.50
06/08/2021	Kirkpatrick, Stuart	Research re curb ramp installation request system response times and draft memo to L. Dardarian re same	0.30	225.00	67.50
06/10/2021	Dardarian, Linda	Preparation for conference with Defendant regarding status of Consent Decree and approval papers	0.10	795.00	79.50
06/11/2021	Kirkpatrick, Stuart	Analyze and forward Duffy and Fox Preliminary Approval declarations from prior curb ramp cases to L. Dardarian	0.10	225.00	22.50
06/11/2021	Wendell, Raymond	Negotiations with A. Cederbaum, J. Lederman, L. Dardarian, T. Fox, and T. Murphy re: finalizing consent decree and submitting for court approval.	0.50	495.00	247.50
06/11/2021	Wendell, Raymond	Strategy with L. Dardarian re: finalizing consent decree and moving for court approval.	0.30	495.00	148.50

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06/11/2021	Dardarian, Linda	Lead conference with J. Lederman, A. Cederbaum, T. Fox, T. Murphy, and R. Wendell re Consent Decree and Preliminary Approval Motion	0.50	795.00	397.50
06/11/2021	Dardarian, Linda	Conference with R. Wendell regarding Consent Decree and Preliminary Approval Motion	0.20	795.00	159.00
06/11/2021	Dardarian, Linda	Memos to and from T. Murphy regarding Consent Decree and Preliminary Approval Motion	0.10	795.00	79.50
06/11/2021	Dardarian, Linda	Draft memo to R. Wendell regarding materials in support of class certification	0.20	795.00	159.00
06/14/2021	Dardarian, Linda	Memos to and from R. Wendell regarding finalizing Consent Decree and preliminary approval papers	0.10	795.00	79.50
06/15/2021	Dardarian, Linda	Finalize Consent Decree and draft email to R. Wendell regarding same	0.20	795.00	159.00
06/16/2021	Dardarian, Linda	Memos to and from T. Fox regarding fee petition	0.10	795.00	79.50
06/17/2021	Wendell, Raymond	Negotiations with A. Cederbaum, J. Lederman, L. Dardarian, T. Fox, and T. Murphy re: finalizing Consent Decree and submitting for court approval.	0.50	495.00	247.50
06/17/2021	Wendell, Raymond	Strategy with L. Dardarian, T. Fox, and T. Murphy re: finalizing Consent Decree and submitting for court approval.	0.30	495.00	148.50
06/17/2021	Wendell, Raymond	Edit Consent Decree	0.30	495.00	148.50
06/17/2021	Wendell, Raymond	Edit Complaint	0.20	495.00	99.00
06/17/2021	Grimes, Scott	Create accessible version of Consent Decree	0.90	255.00	229.50
06/17/2021	Dardarian, Linda	Conference w/ J. Lederman, A. Cederbaum, T. Fox, T. Murphy and R. Wendell re complaint filing, Consent Decree finalization	0.50	795.00	397.50
06/17/2021	Dardarian, Linda	Conference w/ T. Murphy, R. Wendell and T. Fox re same	0.20	795.00	159.00
06/17/2021	Dardarian, Linda	Draft joint press release at City's request	0.40	795.00	318.00
06/18/2021	Wendell, Raymond	Edit draft joint press release.	0.90	495.00	445.50
06/18/2021	Dardarian, Linda	Draft press release, at City's request	0.40	795.00	318.00

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06/18/2021	Dardarian, Linda	Review and edit declarations in support of preliminary approval motion	0.30	795.00	238.50
06/22/2021	Wendell, Raymond	Phone call with C. Evans re preliminary approval declaration	0.20	495.00	99.00
06/22/2021	Wendell, Raymond	Phone call with C. Flanagan re preliminary approval declaration	0.20	495.00	99.00
06/23/2021	Dardarian, Linda	Draft memo to team regarding finalizing Consent Decree	0.10	795.00	79.50
06/24/2021	Kirkpatrick, Stuart	Conference with L. Dardarian, R. Wendell, and S. Grimes re: Complaint and preliminary approval filings	0.60	225.00	135.00
06/24/2021	Kirkpatrick, Stuart	Fact cite-check and edit preliminary approval brief	2.80	225.00	630.00
06/24/2021	Kirkpatrick, Stuart	Edit client preliminary approval declarations	0.40	225.00	90.00
06/24/2021	Kirkpatrick, Stuart	Prepare L. Dardarian declaration exhibits	0.40	225.00	90.00
06/24/2021	Wendell, Raymond	Negotiations with A. Cederbaum, J. Lederman, L. Dardarian, T. Fox, and T. Murphy re: finalizing consent decree and submitting for court approval.	0.40	495.00	198.00
06/24/2021	Wendell, Raymond	Strategy with L. Dardarian, S. Grimes, and S. Kirkpatrick re: filing of complaint and motion for preliminary approval.	0.60	495.00	297.00
06/24/2021	Wendell, Raymond	Edit motion for preliminary approval.	2.20	495.00	1,089.00
06/24/2021	Wendell, Raymond	Finalize declaration of Linda M. Dardarian in support of motion for preliminary approval.	0.40	495.00	198.00
06/24/2021	Wendell, Raymond	Finalize declaration of T. Fox in support of motion for preliminary approval.	0.30	495.00	148.50
06/24/2021	Wendell, Raymond	Finalize declaration of T. Murphy in support of motion for preliminary approval.	0.20	495.00	99.00
06/24/2021	Wendell, Raymond	Finalize declaration of M. Muehe in support of motion for preliminary approval.	0.20	495.00	99.00
06/24/2021	Wendell, Raymond	Finalize declaration of C. Evans in support of motion for preliminary approval.	0.40	495.00	198.00
06/24/2021	Wendell, Raymond	Finalize declaration of C. Flanagan in support of motion for preliminary approval.	0.20	495.00	99.00

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06/24/2021	Wendell, Raymond	Finalize declaration of E. Hamilton in support of motion for preliminary approval.	0.20	495.00	99.00
06/24/2021	Wendell, Raymond	Edit unopposed motion to file brief in excess of 20 pages.	0.50	495.00	247.50
06/24/2021	Wendell, Raymond	Draft memorandum to J. Lederman and A. Cederbaum re: unopposed motion to file brief in excess of 20 pages.	0.20	495.00	99.00
06/24/2021	Grimes, Scott	Conference w/ L. Dardarian, R. Wendell, S. Kirkpatrick re Complaint, and motion for preliminary approval	0.60	255.00	153.00
06/24/2021	Dardarian, Linda	Conference with A. Cederbaum, J. Lederman, T. Fox, and R. Wendell regarding finalizing Consent Decree and preliminary approval papers.	0.40	795.00	318.00
06/24/2021	Dardarian, Linda	Conference with R. Wendell, S. Grimes and S. Kirkpatrick regarding same and complaint filing	0.60	795.00	477.00
06/25/2021	Kirkpatrick, Stuart	Legal cite-check and edit Preliminary Approval brief	3.60	225.00	810.00
06/25/2021	Wendell, Raymond	Finalize declaration of Linda M. Dardarian in support of motion for preliminary approval.	0.30	495.00	148.50
06/25/2021	Wendell, Raymond	Draft memorandum to T. Fox and T. Murphy re: finalizing motion for preliminary approval.	0.40	495.00	198.00
06/25/2021	Wendell, Raymond	Edit motion for preliminary approval.	1.10	495.00	544.50
06/28/2021	Wendell, Raymond	Negotiation with J. Lederman, A. Cederbaum, T. Fox, and T. Murphy re: finalizing filings, joint press release.	0.20	495.00	99.00
06/28/2021	Wendell, Raymond	Finalize motion for preliminary approval of class action settlement.	2.20	495.00	1,089.00
06/29/2021	Wendell, Raymond	Finalize Consent Decree	0.60	495.00	297.00
06/30/2021	Kirkpatrick, Stuart	Correspondence w/ Elaine Hamilton re declaration	0.10	225.00	22.50
06/30/2021	Kirkpatrick, Stuart	Revise Preliminary Approval case filing documents	0.30	225.00	67.50
06/30/2021	Kirkpatrick, Stuart	Place calls to Elaine Hamilton re Consent Decree and Preliminary Approval declaration	0.20	225.00	45.00
06/30/2021	Wendell, Raymond	Phone calls with E. Hamilton re: consent decree and declaration	0.60	495.00	297.00

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06/30/2021	Wendell, Raymond	Finalize motion for preliminary approval of class action settlement.	0.70	495.00	346.50
07/01/2021	Kirkpatrick, Stuart	Phone call and email exchange with Elaine Hamilton re Consent Decree and Preliminary Approval declaration	0.20	225.00	45.00
07/01/2021	Wendell, Raymond	Phone calls with E. Hamilton re: consent decree and declaration	0.50	495.00	247.50
07/01/2021	Wendell, Raymond	Memoranda to and from T. Fox and T. Murphy re press re settlement	0.60	495.00	297.00
07/01/2021	Wendell, Raymond	Conference w/ reporter re settlement	0.20	495.00	99.00
07/01/2021	Wendell, Raymond	Correspondence with A. Cederbaum and J. Lederman re: press inquiries.	0.20	495.00	99.00
07/02/2021	Kirkpatrick, Stuart	Email Defense counsel to notify of plan to file Preliminary Approval filing today, based on receipt of final Consent Decree signature	0.10	225.00	22.50
07/02/2021	Kirkpatrick, Stuart	Analyze District of Massachusetts local rules and standing orders re filing Complaint, motion and Consent Decree w/ Court	0.30	225.00	67.50
07/02/2021	Kirkpatrick, Stuart	Finalize Joint Motion for Preliminary Approval for filing w/ Court	2.40	225.00	540.00
07/02/2021	Kirkpatrick, Stuart	Email and call court clerk to confirm preferred courtesy copy format for Preliminary approval hard copies	0.10	225.00	22.50
07/06/2021	Dardarian, Linda	Review and respond to email regarding final approval hearing	0.20	795.00	159.00
07/07/2021	Dardarian, Linda	Phone call to A. Cederbaum regarding preliminary approval, and phone call to J. Lederman regarding same	0.10	795.00	79.50
07/07/2021	Dardarian, Linda	Conference with J. Lederman regarding same and draft memo to co-counsel regarding same	0.10	795.00	79.50
07/08/2021	Dardarian, Linda	Draft correspondence to J. Lederman regarding City's notices of appearance	0.10	795.00	79.50

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07/08/2021	Dardarian, Linda	Phone call to court clerk regarding final approval hearing, and draft correspondence to City and Co-counsel regarding same	0.10	795.00	79.50
07/12/2021	Dardarian, Linda	Draft memo to R. Wendell re preliminary approval	0.10	795.00	79.50
07/12/2021	Dardarian, Linda	Draft memo to S. Kirkpatrick regarding notice issuance	0.10	795.00	79.50
07/12/2021	Wendell, Raymond	Draft outreach to community re: preliminary approval of settlement.	0.40	495.00	198.00
07/12/2021	Wendell, Raymond	Draft outreach to community re preliminary approval of settlement.	0.20	495.00	99.00
07/13/2021	Wendell, Raymond	Draft web page for GBDH website re: case and settlement, per preliminary approval order.	1.10	495.00	544.50
07/13/2021	Wendell, Raymond	Review and edit announcement to community re settlement.	0.60	495.00	297.00
07/13/2021	Wendell, Raymond	Memoranda to and from L. Dardarian re same	0.20	495.00	99.00
07/13/2021	Wendell, Raymond	Draft motion for attorneys' fees, costs, and expenses.	3.20	495.00	1,584.00
07/13/2021	Dardarian, Linda	Review and edit community outreach memos regarding settlement	0.10	795.00	79.50
07/14/2021	Kirkpatrick, Stuart	Prepare class notice for distribution to organizations	0.50	225.00	112.50
07/14/2021	Kirkpatrick, Stuart	Exchange emails with R. Wendell and T. Murphy re: contact information for the 60 organizations listed in Exhibit D of the Consent Decree	0.20	225.00	45.00
07/15/2021	Kirkpatrick, Stuart	Exchange emails with G. Chakraborty re: distribution of notice to organizations listed in Ex. D of Consent Decree	0.20	225.00	45.00
07/15/2021	Dardarian, Linda	Draft memos to R. Wendell and S. Kirkpatrick regarding class notice issuance and final approval process.	0.10	795.00	79.50
07/15/2021	Wendell, Raymond	Phone call to Judge Stearns' chambers for clarification of minute order re preliminary approval.	0.10	495.00	49.50
07/15/2021	Wendell, Raymond	Memoranda to and from L. Dardarian and S. Kirkpatrick re: clarification of minute order; class notice schedule.	0.20	495.00	99.00

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07/16/2021	Kirkpatrick, Stuart	Prepare for class member inquiries re Boston settlement class notice	0.70	225.00	157.50
07/16/2021	Kirkpatrick, Stuart	Finalize settlement Notice and draft memo to opposing counsel for final review and approval for use in outreach	0.20	225.00	45.00
07/16/2021	Wendell, Raymond	Draft motion for attorneys' fees, costs, and expenses.	1.40	495.00	693.00
07/19/2021	Wendell, Raymond	Strategy with L. Dardarian and S. Grimes re: class notice and motion for attorneys' fees.	0.40	495.00	198.00
07/19/2021	Dardarian, Linda	Conference with R. Wendell regarding class notice issuance	0.10	795.00	79.50
07/19/2021	Dardarian, Linda	Conference with R. Wendell and S. Grimes regarding class notice and fee petition	0.40	795.00	318.00
07/19/2021	Kirkpatrick, Stuart	Exchange emails with G. Chakraborty and T. Murphy re Boston notice project	0.30	225.00	67.50
07/19/2021	Kirkpatrick, Stuart	Prepare for class member inquiries re settlement notice	0.20	225.00	45.00
07/19/2021	Grimes, Scott	Conference w/ R. Wendell and L. Dardarian re class notice and motion for fees	0.40	255.00	102.00
07/20/2021	Dardarian, Linda	Draft memos to S. Grimes regarding class notice distribution	0.40	795.00	318.00
07/20/2021	Wendell, Raymond	Correspondence with City of Boston re: distributing class notice to organizations.	0.30	495.00	148.50
07/20/2021	Grimes, Scott	Exchange emails w/ L. Dardarian re class notice distribution	0.30	255.00	76.50
07/20/2021	Grimes, Scott	Edit class notice and prepare for distribution	0.50	255.00	127.50
07/20/2021	Grimes, Scott	Draft emails to counsel re contact information for class notice distribution	0.20	255.00	51.00
07/21/2021	Kirkpatrick, Stuart	Prepare Boston notice spreadsheet for tracking 7/22/21 notice service	0.30	225.00	67.50
07/21/2021	Kirkpatrick, Stuart	Draft notice cover email to recipient organizations	0.40	225.00	90.00
07/21/2021	Kirkpatrick, Stuart	Draft letters explaining Boston notice to organizations with no available email address	0.20	225.00	45.00
07/21/2021	Dardarian, Linda	Memos to and from R. Wendell, S. Grimes, and S. Kirkpatrick regarding issuing class notice	0.30	795.00	238.50



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07/21/2021	Dardarian, Linda	Conference with S. Kirkpatrick regarding same	0.10	795.00	79.50
07/21/2021	Dardarian, Linda	Conference with S. Grimes regarding same	0.10	795.00	79.50
07/21/2021	Wendell, Raymond	Finalize class notice for distribution.	1.10	495.00	544.50
07/21/2021	Grimes, Scott	Conference w/ L. Dardarian re class notice	0.10	255.00	25.50
07/21/2021	Grimes, Scott	Revise class notice	0.30	255.00	76.50
07/21/2021	Grimes, Scott	Prepare accessible PDF of class notice for posting and distribution, per settlement	0.40	255.00	102.00
07/21/2021	Grimes, Scott	Draft email to Boston disability organizations re class notice	0.20	255.00	51.00
07/21/2021	Kirkpatrick, Stuart	Conference w/ L. Dardarian re class notice issuance	0.10	225.00	22.50
07/22/2021	Kirkpatrick, Stuart	Distribute notice to 58 disability rights organizations, and track responses	1.60	225.00	360.00
07/22/2021	Dardarian, Linda	Draft memos to S. Kirkpatrick and S. Grimes regarding notice issuance	0.10	795.00	79.50
07/23/2021	Kirkpatrick, Stuart	Track and follow up on additional responses to class notice	0.20	225.00	45.00
07/28/2021	Kirkpatrick, Stuart	Conference with L. Dardarian, S. Grimes, and R. Wendell re: preparation for fees motion, service awards, and final approval	1.00	225.00	225.00
07/28/2021	Dardarian, Linda	Review class notice posting and plan for fee motion	0.30	795.00	238.50
07/28/2021	Dardarian, Linda	Conference with R. Wendell, S. Grimes, and S. Kirkpatrick regarding fee motion and class notice issuance (Ray for .6)	1.00	795.00	795.00
07/28/2021	Dardarian, Linda	Exchange memos w/ R. Wendell regarding declarations in support of same	0.30	795.00	238.50
07/28/2021	Wendell, Raymond	(Partial) Strategy with L. Dardarian, S. Grimes, and S. Kirkpatrick re: attorneys' fees and service award motions; class notice timeline.	0.60	495.00	297.00
07/28/2021	Wendell, Raymond	Draft and respond to memoranda to and from L. Dardarian, T. Fox, and T. Murphy re: preparing for motion for attorneys' fees.	2.20	495.00	1,089.00

## GBDH Billing Detail

City of Boston

fees and matter id = '649' and not hidden and not hidden and not on hold and date &lt;=8/27/2021

07/28/2021	Wendell, Raymond	Draft correspondence to J. Lederman and A. Cederbaum re: class notice timeline.	0.50	495.00	247.50
07/28/2021	Wendell, Raymond	Draft motion for attorneys' fees.	2.10	495.00	1,039.50
07/28/2021	Grimes, Scott	Conference w/ L. Dardarian , S. Kirkpatrick, and R. Wendell (partial) re class notice, motions for fees and service awards	1.00	255.00	255.00
07/29/2021	Wendell, Raymond	Legal research re: Judge Stearns requirements for attorneys' fees motion.	2.00	495.00	990.00
07/30/2021	Kirkpatrick, Stuart	Confirm compliance w/ class notice web postings	0.10	225.00	22.50
07/30/2021	Kirkpatrick, Stuart	Draft and email follow-up request for notice organizations to confirm receipt of class notice, and track responses in spreadsheet	0.50	225.00	112.50
07/30/2021	Wendell, Raymond	Draft updates for firm website re: class notice, per preliminary approval order.	0.40	495.00	198.00
07/30/2021	Wendell, Raymond	Draft declaration of Michael Muehe in Support of Plaintiffs' Motion for Service Awards.	2.20	495.00	1,089.00
07/30/2021	Dardarian, Linda	Draft memo to S. Kirkpatrick regarding notice issuance	0.20	795.00	159.00
07/30/2021	Dardarian, Linda	Conference with R. Wendell regarding same	0.10	795.00	79.50
08/03/2021	Dardarian, Linda	Review and edit Muehe declaration in support of motion for service award	0.20	795.00	159.00
08/03/2021	Wendell, Raymond	Draft declaration of Elaine Hamilton in support of Motion for Service Awards.	0.60	495.00	297.00
08/03/2021	Wendell, Raymond	Draft declaration of Crystal Evans in support of Motion for Service Awards.	0.50	495.00	247.50
08/03/2021	Wendell, Raymond	Draft declaration of Colleen Flanagan in support of Motion for Service Awards.	0.50	495.00	247.50
08/03/2021	Wendell, Raymond	Draft memorandum to T. Murphy re: Plaintiffs' Motion for Service Awards.	0.60	495.00	297.00
08/06/2021	Wendell, Raymond	Draft motion for attorneys' fees, costs, and expenses.	6.20	495.00	3,069.00
08/09/2021	Wendell, Raymond	Draft motion for attorneys' fees, costs, and expenses.	3.20	495.00	1,584.00

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City of Boston

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08/09/2021	Wendell, Raymond	Draft memorandum to L. Dardarian re: Judge Stearn's orders on attorneys' fees, costs, and expenses.	2.20	495.00	1,089.00
08/10/2021	Dardarian, Linda	Legal research and draft memo to R. Wendell regarding strategy regarding fee petition	0.70	795.00	556.50
08/10/2021	Wendell, Raymond	Draft motion for attorneys' fees, costs, and expenses.	3.20	495.00	1,584.00
08/11/2021	Grimes, Scott	Draft chart of attorneys' fees expenditures for use as exhibit to fee motion	1.90	255.00	484.50
08/11/2021	Grimes, Scott	Exchange emails w/ co-counsel re same	0.10	255.00	25.50
08/11/2021	Dardarian, Linda	Conference with S. Grimes regarding evidence in support of fee petition	0.20	795.00	159.00
08/11/2021	Dardarian, Linda	Research regarding same	0.20	795.00	159.00
08/11/2021	Dardarian, Linda	Draft correspondence to J. Lederman and A. Cederbaum regarding issuance of class notice	0.10	795.00	79.50
08/11/2021	Dardarian, Linda	Draft memo to T. Murphy regarding responding to class member inquiries	0.10	795.00	79.50
08/11/2021	Dardarian, Linda	Strategy with R. Wendell regarding fee petition and supporting evidence	0.60	795.00	477.00
08/11/2021	Dardarian, Linda	Correspondence to A. Cederbaum and J. Lederman regarding curb ramp survey results	0.10	795.00	79.50
08/11/2021	Dardarian, Linda	Memos to co-counsel regarding evidence in support of fee petition	0.10	795.00	79.50
08/11/2021	Wendell, Raymond	Draft motion for attorneys' fees, costs, and expenses.	1.20	495.00	594.00
08/11/2021	Wendell, Raymond	Strategy with L. Dardarian re: motions for attorneys' fees, service awards.	0.60	495.00	297.00
08/12/2021	Wendell, Raymond	Draft motion for attorneys' fees, costs, and expenses.	6.70	495.00	3,316.50
08/13/2021	Fisher, Katharine	Phone call with L. Dardarian re drafting service award motion and assisting R. Wendell with fee motion.	0.20	465.00	93.00
08/13/2021	Dardarian, Linda	Conference with K. Fisher regarding drafting service award motion and portions of fee motion	0.20	795.00	159.00

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City of Boston

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08/13/2021	Wendell, Raymond	Draft motion for attorneys' fees, costs, and expenses.	6.30	495.00	3,118.50
08/16/2021	Fisher, Katharine	Draft plaintiffs' motion for service awards to class representatives.	1.50	465.00	697.50
08/16/2021	Dardarian, Linda	Review and edit fee motion and supporting exhibits	4.40	795.00	3,498.00
08/16/2021	Dardarian, Linda	Conference with K. Fisher regarding same	0.10	795.00	79.50
08/16/2021	Dardarian, Linda	Draft memo to T. Murphy regarding service award declarations	0.20	795.00	159.00
08/16/2021	Dardarian, Linda	Draft memos to T. Fox and T. Murphy regarding fee petition and evidence in support of same	0.10	795.00	79.50
08/16/2021	Wendell, Raymond	Draft motion for attorneys' fees, costs, and expenses.	1.80	495.00	891.00
08/16/2021	Fisher, Katharine	Conference w/ L. Dardarian re same	0.10	465.00	46.50
08/17/2021	Fisher, Katharine	Draft plaintiffs' motion for service awards to class representatives.	0.60	465.00	279.00
08/17/2021	Wendell, Raymond	Edit motion for attorneys' fees, costs, and expenses.	6.20	495.00	3,069.00
08/17/2021	Dardarian, Linda	Draft L. Dardarian declaration in support of fee petition and exhibits thereto	3.30	795.00	2,623.50
08/17/2021	Dardarian, Linda	Draft memo to T. Fox and T. Murphy re evidence and declarations in support of fee petition	0.30	795.00	238.50
08/18/2021	Wendell, Raymond	Edit motion for attorneys' fees, costs, and expenses.	0.80	495.00	396.00
08/18/2021	Wendell, Raymond	Draft declaration of Linda M. Dardarian in support of Plaintiffs' motion for attorneys' fees, costs, and expenses.	5.50	495.00	2,722.50
08/18/2021	Dardarian, Linda	Conference with S. Grimes regarding evidence in support of fee petition	0.30	795.00	238.50
08/18/2021	Dardarian, Linda	Draft memo to T. Murphy regarding same	0.20	795.00	159.00
08/19/2021	Dardarian, Linda	Review and edit fee motion, declarations and exhibits thereto	0.80	795.00	636.00
08/19/2021	Dardarian, Linda	Draft emails to K. Fisher re service award motion	0.10	795.00	79.50

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City of Boston

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08/19/2021	Wendell, Raymond	Draft declaration of Linda M. Dardarian in Support of Plaintiffs' Motion for Attorneys' Fees, Costs, and Expenses.	6.50	495.00	3,217.50
08/20/2021	Fisher, Katharine	Draft plaintiffs' motion for service awards to class representatives.	0.50	465.00	232.50
08/20/2021	Fisher, Katharine	Analyze draft class representative declarations.	0.40	465.00	186.00
08/23/2021	Kirkpatrick, Stuart	Conference call with L. Dardarian, R. Wendell, K. Fisher, and S. Grimes re: Service Award motion and Fees motion	0.40	225.00	90.00
08/23/2021	Dardarian, Linda	Meet w/ S. Grimes, R. Wendell, K. Fisher, S. Kirkpatrick re attorneys' fee motion, service award motion, declarations and evidence in support of same	0.40	795.00	318.00
08/23/2021	Dardarian, Linda	Strategy w/ R. Wendell re arguments and evidence in support of fee motion	0.10	795.00	79.50
08/23/2021	Dardarian, Linda	Draft memos to T. Fox and T. Murphy re declarations and evidence in support of fee motion	0.20	795.00	159.00
08/23/2021	Dardarian, Linda	Draft declaration of L. Dardarian in support of fee motion	0.50	795.00	397.50
08/23/2021	Grimes, Scott	Conference w/ L. Dardarian, R. Wendell, S. Kirkpatrick, K. Fisher and K. Moseley re motions for fees and service awards	0.40	255.00	102.00
08/23/2021	Grimes, Scott	Research re inflation rates for fees motion	0.30	255.00	76.50
08/23/2021	Fisher, Katharine	Conference with L. Dardarian, R. Wendell, S. Grimes, S. Kirkpatrick, and K. Moseley re motions for attorneys fees and service awards.	0.40	465.00	186.00
08/23/2021	Fisher, Katharine	Draft plaintiffs' motion for service awards to class representatives.	2.70	465.00	1,255.50
08/23/2021	Wendell, Raymond	Review and edit draft of Declaration of Elaine Hamilton in Support of Motion for Service Awards.	0.30	495.00	148.50
08/23/2021	Wendell, Raymond	Review and edit draft of Declaration of Michael Muehe in Support of Motion for Service Awards.	0.10	495.00	49.50

## GBDH Billing Detail

City of Boston

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08/23/2021	Wendell, Raymond	Review and edit draft of Declaration of Crystal Evans in Support of Motion for Service Awards.	0.10	495.00	49.50
08/23/2021	Wendell, Raymond	Memoranda to and from L. Dardarian and K. Fisher re: Named Plaintiffs' Declarations in Support of Motion for Service Awards.	0.30	495.00	148.50
08/23/2021	Wendell, Raymond	Draft Declaration of Linda M. Dardarian in Support of Motion for Attorneys' Fees, Costs, and Expenses.	2.30	495.00	1,138.50
08/23/2021	Fisher, Katharine	Leave message for E. Hamilton re declaration in support of motion for service awards.	0.10	465.00	46.50
08/23/2021	Wendell, Raymond	Meet w/ L. Dardarian, S. Grimes, K. Fisher, S. Kirlpatrick re attorneys' fee motion, service award motion, declarations and evidence in support of same	0.40	495.00	198.00
08/24/2021	Fisher, Katharine	Draft plaintiffs' motion for service awards to class representatives.	6.10	465.00	2,836.50
08/24/2021	Fisher, Katharine	Revise declaration of E. Hamilton in support of motion for service awards.	0.80	465.00	372.00
08/24/2021	Fisher, Katharine	Leave message for E. Hamilton re service award declaration.	0.10	465.00	46.50
08/24/2021	Dardarian, Linda	Review and edit fee brief	1.40	795.00	1,113.00
08/24/2021	Dardarian, Linda	Review and edit declaration of L. Dardarian in support of same	1.10	795.00	874.50
08/24/2021	Dardarian, Linda	Review and edit T. Fox declaration and draft memo re same to T. Fox	0.40	795.00	318.00
08/24/2021	Dardarian, Linda	Review and edit T. Murphy declaration in support of fee motion and draft memo to T. Murphy re same	0.30	795.00	238.50
08/24/2021	Wendell, Raymond	Draft Declaration of Linda M. Dardarian in Support of Motion for Attorneys' Fees, Costs, and Expenses.	4.50	495.00	2,227.50
08/25/2021	Fisher, Katharine	Draft motion for service awards.	3.50	465.00	1,627.50
08/25/2021	Kirkpatrick, Stuart	Begin legal cite-check of Attorneys Fees motion	0.60	225.00	135.00
08/25/2021	Dardarian, Linda	Draft memos to T. Fox and T. Murphy re arguments and evidence in support of fee motion	0.20	795.00	159.00

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City of Boston

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08/25/2021	Dardarian, Linda	Review and edit L. Dardarian declaration in support of fee motion and evidence in support	2.70	795.00	2,146.50
08/25/2021	Dardarian, Linda	Review and edit service award motion	0.80	795.00	636.00
08/25/2021	Grimes, Scott	Finalize T. Fox declaration and exchange emails w/ T. Fox re same	1.20	255.00	306.00
08/26/2021	Grimes, Scott	Conference w/ L. Dardarian, R. Wendell, K. Fisher, S. Kirkpatrick, K. Moseley and M. Miller re motions for fees and service awards	0.50	255.00	127.50
08/26/2021	Fisher, Katharine	Conference with L. Dardarian, R. Wendell, S. Grimes, S. Kirkpatrick, K. Moseley, and M. Miller re fee and service award motions.	0.50	465.00	232.50
08/26/2021	Fisher, Katharine	Phone call with E. Hamilton re finalizing declaration re service awards.	0.10	465.00	46.50
08/26/2021	Fisher, Katharine	Revise motion for service awards re Dardarian declaration and release of claims.	0.30	465.00	139.50
08/26/2021	Kirkpatrick, Stuart	Conference with legal team re: service and fee motions	0.50	225.00	112.50
08/26/2021	Kirkpatrick, Stuart	Complete legal cite-check and edits to Attorneys' Fees brief	1.60	225.00	360.00
08/26/2021	Fisher, Katharine	Draft proposed order granting plaintiffs' motions for service awards and attorneys fees.	0.30	465.00	139.50
08/26/2021	Fisher, Katharine	Revise E. Hamilton declaration in support of motion for service awards	0.20	465.00	93.00
08/26/2021	Fisher, Katharine	Phone call with E. Hamilton re declaration in support of motion for service awards.	0.60	465.00	279.00
08/26/2021	Fisher, Katharine	Correspondence with K. Moseley, S. Grimes, S. Kirkpatrick, L. Dardarian and R. Wendell re revising and finalizing class representative declarations in support of motion for service awards.	0.20	465.00	93.00
08/26/2021	Fisher, Katharine	Correspondence with L. Dardarian, S. Kirkpatrick, R. Wendell, and S. Grimes re finalizing plaintiff declarations in support of motion for service awards.	0.10	465.00	46.50

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08/26/2021	Fisher, Katharine	Correspondence with plaintiffs Muehe, Evans, Flanagan, and Hamilton re finalizing declarations in support of motion for service award, copying S. Grimes and S. Kirkpatrick.	0.20	465.00	93.00
08/26/2021	Dardarian, Linda	Conference w/ S. Grimes, S. Kirkpatrick, R. Wendell, K. Fisher re fee motion, declarations and evidence in support of and service award motions, plaintiff declarations in support of same	0.50	795.00	397.50
08/26/2021	Dardarian, Linda	Draft memos to K. Fisher and S. Kirkpatrick re same	0.30	795.00	238.50
08/26/2021	Dardarian, Linda	Review, edit, and research for L. Dardarian declaration in support of motion for fee award and evidence in support of same	2.50	795.00	1,987.50
08/26/2021	Dardarian, Linda	Review and edit fee motion	0.90	795.00	715.50
08/26/2021	Dardarian, Linda	Review and edit service award motion	0.10	795.00	79.50
08/26/2021	Dardarian, Linda	Review and edit plaintiff declarations for service award motion	0.60	795.00	477.00
08/26/2021	Grimes, Scott	Cite check motion for service awards	2.90	255.00	739.50
08/26/2021	Grimes, Scott	Create accessible PDF of Fox and Murphy declarations	1.80	255.00	459.00
08/26/2021	Wendell, Raymond	Strategy with L. Dardarian, K. Fisher, S. Grimes, S. Kirkpatrick, M. Miller, and K. Barnes-Moseley re: fee and service award motions.	0.50	495.00	247.50
08/26/2021	Wendell, Raymond	Phone call with M. Muehe re: declaration in support of motion for service awards.	0.40	495.00	198.00
08/26/2021	Wendell, Raymond	Edit Declaration of Michael Muehe in Support of Motion for Service Awards.	0.30	495.00	148.50
08/26/2021	Wendell, Raymond	Phone call with C. Evans re: declaration in support of motion for service awards.	0.30	495.00	148.50
08/26/2021	Wendell, Raymond	Edit Declaration of C. Evans in Support of Motion for Service Awards.	0.20	495.00	99.00
08/26/2021	Wendell, Raymond	Edit Declaration of Linda M. Dardarian in Support of Plaintiffs' Motion for Attorneys' Fees, Costs, and Expenses.	1.00	495.00	495.00



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City of Boston

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08/26/2021	Wendell, Raymond	Research hourly rates approved by courts in Massachusetts.	4.60	495.00	2,277.00
08/27/2021	Grimes, Scott	Conference w/ L. Dardarian, R. Wendell, K. Fisher and S. Kirkpatrick re motions for fees and service awards	0.40	255.00	102.00
08/27/2021	Kirkpatrick, Stuart	Conference with legal team re: finalizing service award and attorneys fees motions and supporting documents	0.40	225.00	90.00
08/27/2021	Fisher, Katharine	Conference with L. Dardarian, R. Wendell, S. Grimes, S. Kirkpatrick, K. Moseley, and M. Miller re motions for fees and costs and service awards, declarations in support thereof, and proposed order.	0.40	465.00	186.00
08/27/2021	Wendell, Raymond	Strategy with L. Dardarian, K. Fisher, S. Grimes, S. Kirkpatrick, M. Miller, and K. Barnes-Moseley re: fee and service award motions.	0.40	495.00	198.00
08/27/2021	Wendell, Raymond	Edit Declaration of Linda M. Dardarian in Support of Plaintiffs' Motion for Attorneys' Fees, Costs, and Expenses.	1.40	495.00	693.00
08/27/2021	Wendell, Raymond	Edit memorandum of points and authorities in support of motion for attorneys' fees, costs, and expenses.	1.70	495.00	841.50
08/27/2021	Fisher, Katharine	Phone call with plaintiff E. Hamilton re finalizing declaration in support of motion for service award.	0.10	465.00	46.50
08/27/2021	Fisher, Katharine	Revise motion for class representative service awards.	0.20	465.00	93.00
08/27/2021	Grimes, Scott	Fact check motion for service awards	1.20	255.00	306.00
08/27/2021	Grimes, Scott	Fact check motion for fees	2.30	255.00	586.50
08/27/2021	Grimes, Scott	Prepare exhibits for L. Dardarian declaration	1.40	255.00	357.00
08/27/2021	Dardarian, Linda	Conference w/ R. Wendell, K. Fisher, S. Grimes and S. Kirkpatrick re finalizing attorneys' fee motion and service award motion and supporting declarations and exhibits thereto	0.40	795.00	318.00
08/27/2021	Dardarian, Linda	Review and edit proposed order	0.10	795.00	79.50

## GBDH Billing Detail

City of Boston

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08/27/2021	Dardarian, Linda	Review and edit L. Dardarian declaration for fee motion	1.60	795.00	1,272.00
08/27/2021	Dardarian, Linda	Review and edit fee motion	1.10	795.00	874.50
08/27/2021	Dardarian, Linda	Research and review evidence and strategize arguments for fee motion	1.30	795.00	1,033.50
		<b>Grand Total:</b>		<u>998.7000</u>	<u>448528.50</u>

# **EXHIBIT 4**

United States District Court  
Northern District of California

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

ARTIE LASHBROOK,  
Plaintiffs,

v.

CITY OF SAN JOSE,  
Defendant.

Case No. 20-cv-01236-NC

**ORDER GRANTING FINAL  
APPROVAL OF CLASS  
ACTION SETTLEMENT;  
AWARDING ATTORNEYS'  
FEES AND SERVICE AWARD;  
JUDGMENT**

Re: Dkt. Nos. 20, 21, 22

The Parties have applied to the Court for an order finally approving the settlement of this action in accord with the Proposed Consent Decree (“Decree”), which sets forth the terms and conditions of a proposed settlement and dismissal of the action with prejudice, with the Court retaining jurisdiction to enforce the Decree throughout its term. Plaintiff Artie Lashbrook also moves for an award of attorneys’ fees and a service award pursuant to the parties’ Decree. Having read the papers submitted and carefully considered the arguments and relevant legal authority, and good cause appearing, the Court GRANTS the Parties’ Joint Motion for Final Approval of Class Action Settlement, Lashbrook’s Motion for Service Award and Motion for Attorneys’ Fees.

NOW, THEREFORE, IT IS HEREBY ORDERED:

1. On September 2, 2020, the Court conducted a final hearing to approve the Decree.

United States District Court  
Northern District of California

1           2.       The Court finds that the parties provided notice to the Class in substantially  
 2 the manner and form preliminarily approved by the Court. *See* Dkt. No. 14. The  
 3 Settlement Notice, as ordered and implemented, was reasonably calculated under the  
 4 circumstances to apprise the Settlement Class Members of the pendency of this action, all  
 5 material elements of the proposed Settlement, and their opportunity (a) to submit written  
 6 objections to the Settlement, and (b) to appear at the Fairness Hearing to object to or  
 7 comment on the Settlement. The Settlement Notice was reasonable and the best notice  
 8 practicable to all Settlement Class Members and complied with the Federal Rules of Civil  
 9 Procedure, due process, and all other applicable laws and rules. A full and fair opportunity  
 10 has been afforded to the members of the Settlement Class to participate during the Fairness  
 11 Hearing, and all other persons wishing to be heard have been heard.

12           3.       On May 27, 2020, this Court granted the Parties’ Joint Motion for Class  
 13 Certification, preliminarily certifying a class for declaratory and injunctive relief. *See* Dkt.  
 14 Nos. 10, 14. The Court found, for purposes of settlement only, that the requirements of  
 15 Rule 23 of the Federal Rules of Civil Procedure are met by the Settlement Class: (a)  
 16 joinder of all Settlement Class Members in a single proceeding would be impracticable, if  
 17 not impossible, because of their numbers and dispersion; (b) there are questions of law and  
 18 fact common to the Settlement Class; (c) Lashbrook’s claims are typical of the claims of  
 19 the Settlement Class that he seeks to represent for purposes of settlement; (d) Lashbrook  
 20 has fairly and adequately represented the interests of the Settlement Class and will  
 21 continue to do so; (e) Lashbrook and the Settlement Class are represented by qualified,  
 22 reputable counsel who are experienced in preparing and prosecuting class actions,  
 23 including those involving the allegations made in the Complaint; and (f) the City acted or  
 24 refused to act on grounds that apply generally to the Settlement Class, so that final  
 25 declaratory and injunctive relief is appropriate to the Settlement Class. Accordingly, the  
 26 Court preliminarily certified the following Settlement Class pursuant to Federal Rule of  
 27 Civil Procedure 23(a) and (b)(2):

28           All persons (including residents of and/or visitors to the City of San Jose)

United States District Court  
Northern District of California

1 with any Mobility Disability, who, at any time prior to the Court granting  
2 final approval of the Consent Decree, have been denied full and equal access  
3 to the City’s pedestrian right of way due to the lack of a curb ramp or a curb  
4 ramp that was damaged, in need of repair, or otherwise in a condition not  
5 suitable or sufficient for use.

6 Pursuant to Federal Rule Civil Procedure 23(c)(1)(B), the Court also appointed  
7 Lashbrook and his counsel as representatives of the Settlement Class.

8 4. For the reasons stated above, the Court finds that class certification is  
9 therefore an appropriate method for protecting the interests of the Settlement Class and  
10 resolving the common issues of fact and law arising out of the Lashbrook’s claims while  
11 also eliminating the risk of duplicative litigation. Accordingly, the Court hereby makes  
12 final its earlier provisional certification of the Settlement Class and further confirms the  
13 appointment of the Class Representative and Class Counsel to represent the Settlement  
14 Class, as set forth above.

15 5. The Court grants final approval of the Settlement set forth in the Consent  
16 Decree and finds, after considering all of the factors set forth in Federal Rule of Civil  
17 Procedure 23(e)(2), that it is fair, reasonable, adequate, and in the best interests of the  
18 Settlement Class as a whole. The Settlement, which was negotiated at arm’s length, offers  
19 Settlement Class members comprehensive injunctive relief regarding all of the claims in  
20 Lashbrook’s Complaint, and treats Settlement Class members equitably relative to each  
21 other. The Court grants final approval of the release of the City from the Released Claims  
22 as set forth in the Consent Decree.

23 6. To summarize, the Decree requires the City of San Jose to remediate all  
24 missing and non-compliant curb ramps by 2038. It requires the City to allocate a  
25 minimum amount of money per year towards its construction and remediation obligations,  
26 while reaching certain milestones in ramp construction and remediation. In the event the  
27 City is unable to appropriate the required annual monetary commitment, the Decree  
28 requires the City to make up the shortfall in subsequent years, preempt the shortfall in

1 previous years, or maintain an agreed-upon average rate of ramp construction and  
2 remediation. The City is also required to maintain a Curb Ramp Request Program and  
3 comply with reporting and monitoring requirements. In exchange, Lashbrook and  
4 members of the Class agree to release all injunctive, declaratory, or non-monetary claims  
5 related to the City’s alleged actions or omissions relating to the remediation or  
6 construction of curb ramps. However, unnamed members of the Class do not release  
7 claims for monetary damages, personal injuries, or property damages. Lashbrook releases  
8 all of his monetary claims related to his personal encounters with non-compliant curb  
9 ramps in exchange for a damages payment of \$50,000.

10 7. The Court finds that the Decree is fair, adequate and reasonable to all  
11 potential Class Members. The Parties have conducted an extensive evaluation of the  
12 merits such that Counsel for both Parties are able to reasonably evaluate their respective  
13 positions. Settlement will also avoid substantial additional costs to all Parties, as well as  
14 avoid the delay and the risks presented by further prosecution of issues either in the current  
15 or separate litigation proceedings which are addressed by the Decree. The results achieved  
16 by the Decree are also in line with approved consent decrees in similar cases. *See, e.g.*,  
17 Dkt. No. 10-1 (“Dardarian Decl.”), Ex. 8 (order granting preliminary approval of consent  
18 decree in *Hines v. City of Portland*, Case No. 3:18-cv-00869-HZ (D. Or. June 4, 2019)).

19 8. The Court also finds that the Decree has been reached as the result of good  
20 faith, prolonged, serious, and non-collusive arms-length negotiations. The Parties reached  
21 the Decree after six years of out-of-court negotiations. At the preliminary approval  
22 hearing, the parties represented that they contested the merits of the class claims and  
23 engaged in extensive discovery and information sharing over the six-year period before  
24 reaching the Decree.

25 9. The Court further finds that the City’s Annual Commitment, which requires  
26 the installation or remediation of 27,621 Non-Compliant Curb Ramps by the end of 2038,  
27 as set forth in the Consent Decree is proper and reasonably calculated based on the  
28 available information to ensure and maintain accessibility of the pedestrian right of way

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Northern District of California

1 located in the City of San Jose to persons with Mobility Disabilities. Accordingly, the  
2 Settlement shall be consummated in accordance with the terms and conditions of the  
3 Consent Decree

4 10. No Class Member has objected to the Settlement. The absence of any  
5 objections further supports the Settlement’s final approval.

6 11. Lashbrook and all Settlement Class Members (and their respective heirs,  
7 assigns, successors, executors, administrators, agents and representatives) are conclusively  
8 deemed to have released and forever discharged the City from all Released Claims as set  
9 forth in the Consent Decree. Specifically, Lashbrook and members of the Class agree to  
10 release all injunctive, declaratory, or non-monetary claims related to the City’s alleged  
11 actions or omissions relating to the remediation or construction of curb ramps. Unnamed  
12 members of the Class do not release claims for monetary damages, personal injuries, or  
13 property damages. *See* Dkt. No. 22-1, Ex. 1 §§ 18, 19. Lashbrook and all Settlement  
14 Class Members are bound by this Judgment.

15 12. The benefits described in the Consent Decree are the only consideration,  
16 fees, costs and expenses that the City shall be obligated to give to any party or entity,  
17 including without limitation the Class Representative, Settlement Class Members, and  
18 Class Counsel in connection with the claims released in the Consent Decree and/or the  
19 payment of attorneys’ fees, costs, and expenses in this action.

20 13. The Consent Decree and this Judgment are not admissions of liability or fault  
21 by the City, or a finding of the validity of any claims in this action or of any wrongdoing or  
22 violation of law by the City. The Consent Decree is not a concession by the Parties and, to  
23 the fullest extent permitted by law, neither this Judgment, nor any of its terms or  
24 provisions, nor any of the negotiations connected with it, shall be offered as evidence or  
25 received in evidence in any pending or future civil, criminal, or administrative action or  
26 proceeding to establish any liability of, or admission by the City.

27 14. Notwithstanding the foregoing, nothing in this Judgment shall be interpreted  
28 to prohibit the use of this Judgment to consummate or enforce the Consent Decree or



1 Judgment, or to defend against the assertion of Released Claims in any other proceeding,  
2 or as otherwise required by law.

3 15. The Court approves Lashbrook's requested service award of \$5,000. The  
4 Court finds that the requested award of \$5,000 is reasonable and appropriate compensation  
5 for the work and risk undertaken by spearheading this litigation as the class representative.  
6 *See, e.g., In re Mego Fin. Corp. Sec. Litig.*, 213 F.3d 454, 463 (9th Cir. 2000) (approving  
7 \$5,000 to two plaintiff representatives of 5,400 potential class members in \$1.75 million  
8 settlement); *Hopson v. Hanesbrands, Inc.*, No. 08-cv-0844-EDL, 2009 WL 928133, at \*10  
9 (N.D. Cal. Apr. 3, 2009) (approving \$5,000 award to one member of 217-member class  
10 from \$408,420 settlement amount).

11 16. The Court also approves Lashbrook's requested attorneys' fees and costs. As  
12 the prevailing party in this disability rights class action, Lashbrook is entitled to recover  
13 his reasonable attorneys' fees, costs and expenses. See 42 U.S.C. § 12205 (ADA  
14 prevailing party is entitled to "a reasonable attorney's fee, including litigation expenses,  
15 and costs"); 29 U.S.C. § 794a(b) (Section 504 prevailing party is entitled to "a reasonable  
16 attorney's fee as part of the costs").

17 17. The Court finds that the hourly rates claimed by Class Counsel are  
18 reasonable and within the market range of hourly rates charged by attorneys of comparable  
19 experience, reputation and ability for similar litigation. *See Chalmers v. City of Los*  
20 *Angeles*, 796 F.2d 1205, 1210-11 (9th Cir. 1986). Specifically, Class Counsel request the  
21 following rates:

Name	Position	Rates
Linda M. Dardarian	Partner	\$945
Amy Robertson	Co-Executive Director	\$895
Tim Fox	Co-Executive Director	\$895
Andrew P. Lee	Partner	\$750
Sarah Morris	Staff Attorney	\$520
Beth Holtzman	Associate	\$415

1	Scott G. Grimes	Senior Paralegal	\$325
2	Stuart Kirkpatrick	Paralegal	\$285
3	Marissa McGarry	Paralegal	\$265
4	Arielle Milkman	Paralegal	\$265
5	Ana Diaz	Paralegal	\$265
6	Sophie Breene	Paralegal	\$265

7 18. Reviewing Class Counsel's declarations, the Court also finds that the  
8 1,266.80 hours expended by Class Counsel in investigating the case and negotiating,  
9 settling, and obtaining court approval of the Consent Decree are reasonable.

10 19. Lashbrook's costs and out-of-pocket expenses are recoverable. *See* 42  
11 U.S.C. § 12205; *Lovell v. Chandler*, 303 F.3d 1039, 1058 (9th Cir. 2002). Through July 7,  
12 2020, Class Counsel incurred \$2,925.59 in documented litigation costs and expenses. The  
13 declarations of Class Counsel and accompanying exhibits and the record in this case  
14 demonstrate that these costs and expenses were reasonable and necessary for the pursuit  
15 and resolution of this case.

16 20. Accordingly, the Court approves a total of \$725,253.09 in attorneys' fees,  
17 costs, and litigation expenses.

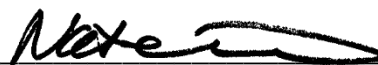
18 21. In accordance with the terms of the Consent Decree, the Court reserves  
19 exclusive and continuing jurisdiction over Lashbrook, the Settlement Class Members, the  
20 City, and the Consent Decree throughout the term of the Consent Decree, for the sole  
21 purpose of supervising the implementation, enforcement, construction, and interpretation  
22 of the Consent Decree and this Judgment. In that regard, any challenges to the Consent  
23 Decree's terms or implementation, whether under state or federal law, shall be subject to  
24 the exclusive and continuing jurisdiction of this Court. All parties have consented to the  
25 jurisdiction of a magistrate judge. *See* Dkt. Nos. 7, 9.

26 22. The Clerk is directed to enter this Judgment and terminate Case No. 20-cv-  
27 01236-NC.

**IT IS SO ORDERED.**

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Dated: September 2, 2020



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NATHANAEL M. COUSINS  
United States Magistrate Judge

United States District Court  
Northern District of California

# **EXHIBIT 5**

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Northern District of California

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

ABDUL NEVAREZ, et al.,  
Plaintiffs,  
v.  
FORTY NINERS FOOTBALL  
COMPANY, LLC, et al.,  
Defendants.

Case No. 16-CV-07013-LHK

**ORDER GRANTING MOTION FOR  
FINAL APPROVAL OF CLASS  
ACTION SETTLEMENT; GRANTING  
MOTION FOR SERVICE AWARDS;  
AND GRANTING MOTION FOR  
ATTORNEY’S FEES, COSTS, AND  
EXPENSES**

Re: Dkt. No. 394, 395, 396, 408

Before the Court are Plaintiffs’ (1) motion for final approval of a class action settlement, ECF No. 395; (2) motion for service awards, ECF No. 394; and (3) motion for reasonable attorney’s fees, costs, and expenses, ECF No. 408.<sup>1</sup> Having considered the parties’ briefs, the relevant law, and the record in this case, the Court GRANTS Plaintiffs’ motion for final approval, Plaintiffs’ motion for service awards, and Plaintiffs’ motion for attorney’s fees, as set forth below. The Court considers each motion in turn.

<sup>1</sup> Plaintiffs originally filed the motion for attorney’s fees on May 25, 2020, ECF No. 396, but Plaintiffs refiled their motion on June 25, 2020 to correct a number of errata, ECF No. 408.

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**I. MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

Plaintiffs have moved the Court for an order granting final approval of the class action Settlement Agreement and Release of Claims (“Settlement Agreement”), ECF No. 395, which was filed with the Court at ECF Nos. 375-2; 391. The Court preliminarily approved the Settlement Agreement in this action by order entered on March 9, 2020. *See* ECF No. 392 (“Preliminary Approval Order”). On July 16, 2020 the Court held a Final Approval hearing to consider final approval of the Settlement Agreement and to determine, among other things, whether the settlement is fair, reasonable, and adequate. Having considered the motions, the oral arguments, the relevant law, and the record in this case, the Court GRANTS the Plaintiffs’ motion for final approval of the class action settlement as follows:

1. All terms used herein, unless otherwise defined, shall have the same meanings as set forth in the Settlement Agreement.

2. The Court finds that the Parties complied with the Notice procedures set forth in the Court’s Preliminary Approval Order and Settlement Agreement by disseminating the Court-approved long-form Notice (ECF No. 390-3) and Claim Form (ECF No. 390-3) to Class Members by mail and email; providing the long-form Notice to the agreed-upon membership and/or service organizations for individuals with mobility disabilities; posting the Court-approved short-form Notice (ECF No. 390-1) at conspicuous locations throughout Levi’s Stadium and on websites controlled by Defendants; and creating and maintaining a Settlement website, email address, and toll-free telephone number. The Court further finds that these methods:

a. constituted the best practicable notice to members of the Plaintiff Classes under the circumstances of the Action;

b. constituted reasonable, due, adequate and sufficient notice to all Persons entitled to receive notice; and

c. constituted notice that met all applicable requirements of the Federal Rules of Civil Procedure, 28 U.S.C. § 1715, the Due Process Clause of the United States Constitution,

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and any other applicable law, as well as this District’s Procedural Guidance for Class Action Settlements.

3. The Court finds that the Claim Form distributed to the Damages Class met all applicable requirements of the Federal Rules of Civil Procedure, 28 U.S.C. § 1715, the Due Process Clause of the United States Constitution, and any other applicable law. The Court further finds that the Claims Process set forth in the Settlement Agreement provides Damages Class Members with a full and fair opportunity to submit claims for damages, an effective method of distributing monetary relief to the Damages Class, and provides for an equitable plan of allocation of money damages between Damages Class Members. *See* Rule 23(e)(2)(A)(ii), (D).

4. On March 9, 2020, the Court preliminarily certified the following classes for settlement purposes under Fed. R. Civ. P. 23(a) and (b)(3):

**Injunctive Relief Class:** All persons with mobility disabilities who use wheelchairs, scooters, or other mobility aids who will attempt to purchase accessible seating for a public event at Levi’s Stadium and who will be denied equal access to the Stadium’s facilities, services, accessible seating, parking, amenities, and privileges, including ticketing, from December 7, 2013 through the date of the Court’s Order Granting Preliminary Approval of Class Action Settlement.

**Companion Injunctive Relief Class:** All persons who are companions of persons with mobility disabilities who use wheelchairs, scooters or other mobility aids and who have used or will use companion seating for public events located at Levi’s Stadium from December 7, 2013 through the date of the Court’s Order Granting Preliminary Approval of Class Action Settlement.

**Damages Class:** All persons with mobility disabilities who use wheelchairs, scooters or other mobility aids who have purchased, attempted to purchase, or for whom third parties purchased accessible seating and who have been denied equal access to Levi’s Stadium’s facilities, services, accessible seating, parking, amenities, and privileges at an event controlled by the Forty Niners Football Company, LLC; Forty Niners SC Stadium Company, LLC; or Forty Niners Stadium Management Company, LLC, from April 13, 2015 through the date of the Court’s Order Granting Preliminary Approval of Class Action Settlement.

*See* ECF No. 392.

5. The Court finds that the Plaintiff Classes continue to meet the requirements for

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class certification under Federal Rule of Civil Procedure 23 and all other applicable laws and rules.

6. The Injunctive Relief Class and Companion Injunctive Relief Class are finally certified under Fed. R. Civ. P. 23(b)(2). The Court concludes that: (a) joinder of all Class Members in a single proceeding would be impracticable, if not impossible, because of their numbers and dispersion; (b) there are questions of law and fact common to the Plaintiff Classes; (c) Plaintiffs’ claims are typical of the claims of the Plaintiff Classes that they seek to represent for purposes of settlement; (d) Plaintiffs have fairly and adequately represented the interests of the Classes and will continue to do so; (e) Plaintiffs and the Plaintiff Classes are represented by qualified, reputable counsel who are experienced in preparing and prosecuting class actions, including those involving the sort of practices alleged in the Complaint; and (f) Defendants acted or refused to act on grounds that apply to the Injunctive Relief Class and Companion Injunctive Relief Class as a whole.

7. The Damages Class is finally certified under Fed. R. Civ. P. 23(b)(3). The Court concludes that: (a) joinder of all Damages Class Members in a single proceeding would be impracticable, if not impossible, because of their numbers and dispersion; (b) there are questions of law and fact common to the Damages Class; (c) Plaintiff Abdul Nevarez’s claims are typical of the claims of the Damages Class that he seeks to represent for purposes of settlement; (d) Plaintiff Abdul Nevarez has fairly and adequately represented the interests of the Damages Class and will continue to do so; (e) Plaintiff Abdul Nevarez and the Damages Class are represented by qualified, reputable counsel who are experienced in preparing and prosecuting class actions, including those involving the sort of practices alleged in the Complaint; (f) questions of law or fact common to the Damages Class predominate over any questions affecting only individual members; and (g) a class action is superior to other available methods for fairly and efficiently adjudicating the controversy.

8. Class certification is therefore an appropriate method for protecting the interests of the Plaintiff Classes and resolving the common issues of fact and law arising out of the Plaintiffs’



1 claims while also eliminating the risk of duplicative litigation. Accordingly, the Court hereby  
2 makes final its earlier certification of the Plaintiff Classes and confirms its appointment of  
3 Plaintiffs Abdul Nevarez and Sebastian DeFrancesco as Injunctive Relief Class Representatives;  
4 Plaintiff Priscilla Nevarez as the Companion Injunctive Relief Class Representative; Plaintiff  
5 Abdul Nevarez as the Damages Class Representative; and Guy Wallace of Schneider Wallace  
6 Cottrell Konecky LLP, Linda M. Dardarian of Goldstein Borgen Dardarian & Ho, and Adam Wolf  
7 of Peiffer Wolf Carr & Kane as Class Counsel.

8           9.       The Court grants final approval of the Settlement and finds that it is fair,  
9 reasonable, adequate, and in the best interests of the Plaintiff Classes as a whole. First, the  
10 Settlement offers Class Members significant injunctive relief regarding all of the claims in the  
11 Fourth Amended Complaint, including Defendants’ failure to provide physical access and  
12 Defendants’ failure to make reasonable modifications in policy and practice to ensure equal access  
13 to the Stadium’s facilities and services. Second, the non-reversionary damages fund offers  
14 substantial monetary relief to Damages Class Members. Third, as set forth below, the Court finds  
15 that Plaintiffs’ requested attorneys’ fees, costs, and expenses, and Class Representative service  
16 awards are reasonable and supported by applicable law, as modified by the Court. Finally, the  
17 absence of any objections or exclusions further supports final approval of the Settlement. In sum,  
18 when considered against the potential risks, expense, complexity and duration of further litigation,  
19 and the importance of the accessibility of the Stadium and its related facilities to the Class  
20 Members, the Court finds the relief secured by the Settlement to be more than adequate. *See* Fed.  
21 R. Civ. P. 23(e)(2)(C).

22           10.       The Parties and Settlement Administrator are hereby directed to implement and  
23 consummate the Settlement according to its terms and provisions and the Court’s Preliminary  
24 Approval Order. Class Counsel and Defendants shall take all steps necessary and appropriate to  
25 provide the Plaintiff Class Members with the benefits to which they are entitled under the terms of  
26 the Settlement.

1           11.     The Plaintiffs and all Plaintiff Class Members (and their respective heirs, assigns,  
2 successors, executors, administrators, agents and representatives) are conclusively deemed to have  
3 released and forever discharged the Released Parties from all released claims as set forth in  
4 Section XIII of the Settlement Agreement. All members of the Injunctive Relief Class and  
5 Companion Injunctive Relief Class are bound by this Order. All members of the Damages Class,  
6 except for those individuals who filed valid and timely Opt-Outs, are bound by this Order.  
7 Damages Class Members who submitted timely and valid Opt-Out requests are neither permitted  
8 to share in the benefits of the damages fund nor bound by this Final Order and Judgment as to  
9 claims for Unruh Act statutory minimum damages against the Forty Niners Defendants. Damages  
10 Class Members who did not opt out of the case at the class certification stage were afforded a new  
11 opportunity to do so. *See* Fed. R. Civ. P. 23(e)(4). Throughout the Term of the Settlement  
12 Agreement, Plaintiff Class Members are enjoined from asserting or prosecuting any claims that are  
13 released by the Settlement Agreement.

14           12.     The Settlement Agreement and this Order are not admissions of liability or fault by  
15 Defendants or other Released Parties, or a finding of the validity of any claims in this action or of  
16 any wrongdoing or violation of law by Defendants or other Released Parties. The Settlement  
17 Agreement is not a concession by the Parties and, to the fullest extent permitted by law, neither  
18 this Order, nor any of its terms or provisions, nor any of the negotiations connected with it, shall  
19 be offered as evidence or received in evidence in any pending or future civil, criminal, or  
20 administrative action or proceeding to establish any liability of, or admission by Defendants or  
21 other Released Parties. Notwithstanding the foregoing, nothing in this Order shall be interpreted  
22 to prohibit the use of this Order to consummate or enforce the Settlement Agreement or Order, or  
23 to defend against the assertion of Released Claims in any other proceeding, or as otherwise  
24 required by law.

25           13.     Within 21 days after the distribution of the settlement funds and payment of  
26 attorneys' fees, expenses and costs, the Parties are ordered to file a Post-Distribution Accounting,

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1 which provides the following information in accordance with the Northern District’s Procedural  
2 Guidance for Class Action Settlements: The total settlement fund, the total number of class  
3 members; the total number of class members to whom notice was sent and not returned as  
4 undeliverable; the number and percentage of claim forms submitted; the number and percentage of  
5 opt-outs; the number and percentage of objections; the average and median recovery per claimant;  
6 the largest and smallest amounts paid to class members; the methods of notice and the methods of  
7 payment to class members; the number and value of checks not cashed; the amounts distributed to  
8 each *cy pres* recipient; the administrative costs; the attorneys’ fees and costs; and the benefit  
9 conferred on the classes by the injunctive relief obtained. Within 21 days after the distribution of  
10 the settlement funds and award of attorneys’ fees, the Parties should post the Post-Distribution  
11 Accounting, including an easy-to-read chart that allows for quick comparisons with other cases, on  
12 the settlement website. The Court may hold a hearing following submission of the parties’ Post-  
13 Distribution Accounting.

14 14. In accordance with the terms of the Settlement Agreement, the Court shall maintain  
15 continuing jurisdiction over Plaintiffs, the Class Members, Defendants, and the Settlement  
16 Agreement throughout the term of the Settlement Agreement, for the purpose of supervising the  
17 implementation, enforcement, construction, and interpretation of the Settlement Agreement and  
18 this Order, through the term of the Settlement Agreement. In that regard, any challenges to the  
19 Settlement Agreement’s terms or implementation, whether under state or federal law, shall be  
20 subject to the exclusive and continuing jurisdiction of this Court.

21 15. This Action is hereby dismissed on the merits and with prejudice as to the Released  
22 Claims, without fees or costs to any Party except as otherwise provided in the Court’s Order on  
23 Plaintiffs’ Motion for Reasonable Attorneys’ Fees, Costs and Expenses, and the Settlement  
24 Agreement.

25 **II. MOTION FOR SERVICE AWARDS**

26 In addition, Plaintiffs filed a motion for service awards, ECF No. 394. The motion

1 requests \$5,000 in service awards for each of three class representatives: Abdul Nevarez, Priscilla  
2 Nevarez, and Sebastian DeFrancesco. *Id.* at 1. The motion is unopposed, and no Class members  
3 have filed objections to the Settlement Agreement.

4 In order to evaluate the reasonableness of the size of a service award, the Ninth Circuit  
5 looks to “the number of named plaintiffs receiving incentive payments, the proportion of the  
6 payments relative to the settlement amount, and the size of each payment.” *In re Online DVD-*  
7 *Rental Antitrust Litig.*, 779 F.3d 934, 947 (9th Cir. 2015) (internal quotation marks omitted).  
8 Here, the three class representatives, Abdul Nevarez, Priscilla Nevarez, and Sebastian  
9 DeFrancesco, seek Service Awards of \$5,000 each. ECF No. 394. The contemplated Service  
10 Awards total to \$15,000 out of the \$24,000,000 Plaintiffs’ settlement, which is less than .1% of the  
11 \$24 million Damages Fund. The number of service awards requested and the respective amounts  
12 fall well below the levels that the Ninth Circuit has scrutinized in the past. *Id.* at 948 (finding  
13 service awards to be reasonable in part because there were “nine class representatives” and  
14 because “the \$45,000 in incentive awards ma[de] up a mere .17% of the total settlement”).  
15 Moreover, the requested amount of \$5,000 is considered “presumptively reasonable” in this  
16 district. *See Villegas v. J.P. Morgan Chase & Co.*, No. CV 09-00261 SBA EMC, 2012 WL  
17 5878390, at \*7 (N.D. Cal. Nov. 21, 2012).

18 Thus, having considered the motion, Plaintiffs’ declarations and exhibits thereto, the  
19 arguments of counsel, and all files, records, and proceedings in this action, the Court finds that  
20 good cause exists to approve the motion. All three Plaintiffs have diligently fulfilled their duties  
21 as Class Representatives. All have expended significant effort and made personal sacrifices in  
22 order to obtain an excellent result for the Classes they represent. The class representatives  
23 participated in numerous aspects of the litigation, including responding to written discovery,  
24 drafting declarations, preparing and sitting for depositions, advising counsel on factual  
25 investigation and settlement, and class outreach. ECF No. 394 at 7–8. Over the course of over  
26 three years, “Mr. Nevarez estimates that he has spent at least 72 hours working on this case; Ms.

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1 Nevarez estimates at least 90 hours; and Mr. DeFrancesco estimates at least 52 hours.” ECF No.  
2 394 at 7.

3 Accordingly, Plaintiffs’ motion is GRANTED. The Court hereby approves: a service  
4 award to Plaintiff Abdul Nevarez in the amount of \$5,000; a service award to Plaintiff Priscilla  
5 Nevarez in the amount of \$5,000; and a service award to Plaintiff Sebastian DeFrancesco in the  
6 amount of \$5,000.

7 **III. MOTION FOR ATTORNEY’S FEES, COSTS, AND EXPENSES**

8 Finally, Plaintiffs also filed a motion for reasonable attorney’s fees, costs, and expenses.  
9 ECF No. 408. Specifically, Plaintiffs move for \$1,199,148.87 in out-of-pocket litigation costs and  
10 expenses, and \$12,258,003.53 in attorney’s fees, which together amounts to the \$13,457,152.40  
11 cap on attorney’s fees, costs, and expenses set forth in Section XIV.A of the Settlement  
12 Agreement. The motion is unopposed, and no Class members have filed objections to the  
13 Settlement Agreement. Below, the Court first considers the costs and expenses, before  
14 considering the reasonableness of Plaintiffs’ request for attorney’s fees.

15 As the prevailing parties, Plaintiffs are entitled to recover their reasonable attorneys’ fees,  
16 costs and expenses. *See* 42 U.S.C. § 12205 (ADA) and Cal. Civ. Code § 52(a) (Unruh Civil  
17 Rights Act). A party that obtains a judicially enforceable settlement agreement that provides  
18 some of the relief sought is a “prevailing party” for purposes of fee-shifting statutes. *See, e.g., La*  
19 *Asociacion de Trabajadores de Lake Forest v. City of Lake Forest*, 624 F.3d 1083, 1089 (9th Cir.  
20 2010); *Folsom v. Butte County Assn. of Govts.*, 32 Cal.3d 668, 671 (1982). Here, Plaintiffs have  
21 prevailed under both federal and state law by achieving a global settlement that resolves all  
22 federal and state law claims. The Settlement provides comprehensive injunctive relief to both  
23 injunctive relief classes under both federal and state law and establishes a damages fund for the  
24 damages class under California law. The factual and legal issues that were litigated would  
25 reasonably be attributed to both federal and state law claims. Accordingly, both federal and state  
26 law apply to Plaintiffs’ application for fees, costs and litigation expenses.

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**A. Costs and Expenses**

Plaintiffs’ costs and out-of-pocket expenses, including expert witness fees, are recoverable. *See* 42 U.S.C. § 12205; *Lovell v. Chandler*, 303 F.3d 1039, 1058 (9th Cir. 2002). Through May 15, 2020, Class Counsel incurred \$1,199,148.87 in litigation costs and expenses. Plaintiffs’ costs and out-of-pocket expenses are well-documented. The Court finds that the declarations of Class Counsel and accompanying exhibits and the record in this case demonstrate that these costs and expenses were reasonable and necessary for the prosecution of this litigation. Accordingly, the Court GRANTS Class Counsel \$1,199,148.87 in costs and out-of-pocket expenses.

**B. Attorney’s Fees**

As discussed above, Section XIV.A of the Settlement Agreement caps Plaintiffs’ request for attorney’s fees, costs, and expenses at \$13,457,152.40. Because Plaintiffs seek \$1,199,148.87 in costs and expenses, which the Court awarded in full, Plaintiffs request the remaining \$12,258,003.53 of the cap in attorney’s fees. Although the Court grants Plaintiffs the full \$12,258,003.53 amount in attorney’s fees below, the Court’s calculation of attorney’s fees differs from that of Plaintiffs. The Court first discusses Plaintiffs’ lodestar calculation before turning to the requested lodestar multiplier.

**1. Lodestar Calculation**

Plaintiffs state that their lodestar in the instant case is \$11,605,473. ECF No. 408 at 13. The Court finds that the lodestar is reasonable and fair, with the exception of the hourly rate billed for contract attorneys, which the Court discusses below.

Specifically, Plaintiffs argue that their lodestar in the instant case was initially \$12,994,251, which was then reduced by approximately 10.69% through the exercise of billing judgment<sup>2</sup> to arrive at the lodestar of \$11,605,473. *See* ECF No. 408 at 20. The Court has reviewed the hours spent by Plaintiffs in litigating this case over the course of three-and-a-half years and finds that the hours

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<sup>2</sup> Specifically, Plaintiffs explain that they “removed from their lodestar all time spent by attorneys and staff who billed less than 30 hours on the case . . . [and] exercised additional billing judgment as set forth in the declarations of counsel.” ECF No. 408 at 20.

1 expended are reasonable. This case involved over three years of contentious and extensive  
2 litigation, including the following:

- 3 • Three motions to dismiss filed by Defendants, which this Court largely denied;
- 4 • Eighteen joint discovery letters—for many of which the Court granted Plaintiffs full relief;
- 5 • Thirteen sets of document requests and interrogatories, fifteen sets of requests for  
6 admission, and propounding six sets of subpoenas for documents;
- 7 • Production of 3,400,000 pages of documents by Defendants and third parties;
- 8 • Fourteen days of inspections of the Stadium, parking lots, and connecting pedestrian rights  
9 of way, from which Plaintiffs identified over 2,600 physical barriers to access at the  
10 Stadium;
- 11 • 48 depositions, including depositions of 16 experts;
- 12 • Two sets of cross-motions for partial summary judgment;
- 13 • Eight formal mediations; and
- 14 • Many informal settlement discussions, several in-person with all counsel.

15 Thus, Plaintiffs’ hours are amply justified in light of the extensive litigation that has occurred to date  
16 over the course of three and a half years.

17 Moreover, the Court has reviewed the billing rates for the attorneys, paralegals, and litigation  
18 support staff at each of the firms representing Plaintiffs and the Certified Classes in this case. The  
19 Court finds that these rates are reasonable in light of prevailing market rates in this district and  
20 that counsel for Plaintiffs have submitted adequate documentation justifying those rates, with the  
21 exception of the hourly rates billed by Schneider Wallace Cottrell Konecky LLP (“Schneider  
22 Wallace”) for the use of staff attorneys.

23 However, as to the staff attorneys, the Court notes that Schneider Wallace requests a rate of  
24 \$625 per hour for each of three staff attorneys. *See* ECF No. 408-1 (“Wallace Decl.”) ¶ 117.

25 However, at the July 16, 2020 Final Approval hearing, Mr. Wallace acknowledged that these  
26 attorneys are paid at an hourly rate substantially less than \$625 per hour, which constitutes a markup

1 of \$595 per staff attorney per hour. Schneider Wallace requests \$625 per hour for each of these three  
 2 staff attorneys for a total of 1,811.9 hours of work, which the Court estimates to constitute a markup  
 3 of \$1,078,080.50 or about 15% of Schneider Wallace’s lodestar. *See id.* Although the Court has  
 4 historically declined to apply a “categorical rule that contract and staff attorneys must be billed at  
 5 cost,” the Court has previously rejected such a high markup on a contract attorney’s hourly rate and  
 6 instead awarded an hourly rate of \$240.00. *In re Anthem, Inc. Data Breach Litig.*, No. 15-MD-  
 7 02617-LHK, 2018 WL 3960068, at \*18–20 (N.D. Cal. Aug. 17, 2018). As in the Court’s decision in  
 8 *In re Anthem, Inc. Data Breach Litigation*, the Court will adopt the \$240.00 hourly rate for Schneider  
 9 Wallace’s staff attorneys based on precedent and in the absence of any argument to justify a different  
 10 markup on the staff attorney rate. *See id.* at \*20 (“In future cases, the Court is willing to receive  
 11 documentation justifying a lower or higher rate, but for purposes of the rough lodestar calculation  
 12 here, the Court finds that \$240.00 per hour for contract and staff attorney time is a reasonable rate.”).  
 13 At the July 16, 2020 Final Approval hearing, Mr. Wallace stated that he did not oppose the Court’s  
 14 adoption of the \$240 hourly rate for these three staff attorneys. After adjusting Schneider Wallace’s  
 15 staff attorney rate to \$240.00 per hour, the Court finds that the total lodestar of \$11,605,473 is  
 16 reduced to \$10,907,891.50.

## 17 **2. Lodestar Multiplier**

18 Next, Plaintiffs argue that they are entitled to a positive lodestar multiplier of up to 1.5.  
 19 However, the actual requested lodestar multiplier is significantly lower due to the \$13,457,152.40  
 20 cap on attorney’s fees, costs, and expenses. Specifically, to arrive at the requested attorney’s fees  
 21 amount of \$12,258,003.53 from the lodestar of \$10,907,891.50, Plaintiffs need only be entitled to a  
 22 lodestar multiplier of approximately 1.124, which is a factor of four times less than the 1.5 lodestar  
 23 multiplier they request.

24 The Court agrees that Plaintiffs are entitled to a lodestar multiplier of at least 1.124 in  
 25 consideration of the following factors (1) contingent risk to counsel, (2) novelty and difficulty of  
 26 the questions involved, (3) skill required to perform the legal service properly, (4) preclusion of



1 other employment by the attorneys, and (5) the result obtained and the importance of the lawsuit  
2 to the public. *See Ketchum v. Moses*, 24 Cal. 4th 1122, 1132 (2001); *Serrano v. Priest*, 20 Cal.  
3 3d 25, 49 (1977).

4 In particular, the Court notes the outstanding result obtained for the class and the  
5 importance of the lawsuit to the public. Specifically, the Settlement Agreement “will remediate  
6 more than 2,600 barriers in [Levi’s Stadium], the parking lots and the pedestrian rights of way  
7 that serve the Stadium,” which is “over 99% of the barriers identified by Plaintiffs.” ECF No.  
8 408 at 23. Such relief will bring Levi’s Stadium “into compliance with the 2010 [Americans with  
9 Disability Act Standards] or the 2019 [California Building Code], whichever provides greater  
10 access, thus dramatically improving accessibility and usability for person with mobility  
11 disabilities and their nondisabled companions.” *Id.* The costs to remediate the over 2,600  
12 barriers is estimated to cost Defendants at least \$12.2 million. ECF No. 408-6 ¶ 67.

13 Moreover, the Settlement Agreement provides for a \$24 million non-reversionary  
14 damages fund, which Plaintiffs believe to be “the largest such fund ever achieved in a case  
15 alleging claims under the public facilities and accommodations provisions of the ADA.” *Id.* The  
16 Settlement Agreement prompted a participation rate of almost 94%. There were an estimated  
17 5,779 potential Damages Class Members, and 5,418 claim forms were submitted. *See* ECF No.  
18 395 at 5. Furthermore, there were no opt-outs and no objections. *See* ECF No. 411 at 2. At the  
19 July 16, 2020 Final Approval hearing, Plaintiffs estimated that the average recovery for each  
20 Damages Class Member would be at least \$4,000, and on average over \$4,400. The Court finds  
21 that the Settlement achieved by Plaintiffs’ counsel provides considerable and substantial relief to  
22 the class members, which therefore justifies a lodestar multiplier of at least 1.124.

### 23 3. Percentage of Recovery Cross-Check

24 To guard against an unreasonable result, the Ninth Circuit generally encourages district  
25 courts to “cross-check[] their calculations against a second method.” *In re Bluetooth Headset*  
26 *Prods. Liab. Litig.*, 654 F.3d 935, 944 (9th Cir. 2011). However, the Ninth Circuit has explained

United States District Court  
Northern District of California

1 that in cases vindicating civil rights, “the relief sought—and obtained—is often primarily  
2 injunctive in nature and thus not easily monetized.” *See id.* at 941.

3 In this case, the Court likewise finds that it would be difficult to monetize the extensive  
4 injunctive relief, which remediates over 2,600 access barriers at Levi’s Stadium. Nonetheless, if  
5 the Court assumes that the approximately \$12.2 million expected Stadium remediation cost is a  
6 good substitute to monetize the increased accessibility for the Stadium’s patrons, ECF No. 408-6  
7 ¶ 67, the amount of attorney’s fees, including the 1.124 multiplier, would constitute about 24.7%  
8 of a “constructive common fund” in this case, which would be comprised of the \$24 million  
9 Damages Fund, the approximately \$12.2 million cost of injunctive relief, the \$15,000 service  
10 awards, \$12,258,003.53 attorney’s fees, and \$1,199,148.87 costs. *See In re Bluetooth*, 654 F.3d  
11 at 945 (calculating an analogous percentage-of-recovery using a “constructive common fund”).  
12 This result of 24.7% of the total recovery is below the 25% benchmark percentage and confirms  
13 that the requested \$12,258,003.53 in attorney’s fees is a reasonable amount. *See id.* at 945 (“If  
14 the lodestar amount overcompensates the attorneys according to the 25% benchmark standard,  
15 then a second look to evaluate the reasonableness of the hours worked and rates claimed is  
16 appropriate.”) (quoting *In re Coordinated Pretrial Proceedings*, 109 F.3d 602, 607 (9th  
17 Cir.1997)).

18 Accordingly, based on the factors considered above and the applicable law, the Court  
19 finds that a lodestar multiplier of 1.124 is reasonable and justified.

20 **4. Total Attorney’s Fees**

21 The Court finds that Plaintiffs are entitled to a lodestar of \$10,907,891.50 and a multiplier of  
22 1.124. Accordingly, the Court GRANTS Plaintiffs’ full requested amount of \$12,258,003.53 in  
23 attorney’s fees.

24 **IV. CONCLUSION**

25 For the foregoing reasons, the Court GRANTS Plaintiffs’ motion for final approval of the  
26 proposed class action settlement, GRANTS Plaintiffs’ motion for service awards, and GRANTS

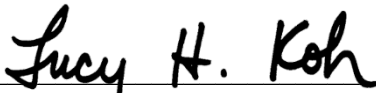
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Plaintiffs’ motion for attorneys’ fees, costs, and expenses as follows:

- \$15,000 in service awards, comprised of \$5,000 for each of three class representatives: Abdul Nevarez, Priscilla Nevarez, and Sebastian DeFrancesco;
- \$12,258,003.53 in attorneys’ fees to Class Counsel; and
- \$1,199,148.87 in costs and expenses to Class Counsel.

**IT IS SO ORDERED.**

Dated: July 23, 2020

  
 \_\_\_\_\_  
 LUCY H. KOH  
 United States District Judge

United States District Court  
Northern District of California

# **EXHIBIT 6**

# *2020 Real Rate Report<sup>®</sup>*

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

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## A Letter to Our Readers

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

Our Real Rate Report has been a useful data analytics resource to the legal industry since its inception in 2010 and continues to evolve. The Real Rate Report is powered by Wolters Kluwer's ELM Solutions LegalVIEW® data warehouse, the world's largest source of legal performance benchmark data, which has grown to include over \$140 billion in anonymized legal data.

The legal services industry relies on internal analytics and the use of external data resources, such as the LegalVIEW® data warehouse, to support legal management strategies. The depth and details of the data in the Real Rate Report enable you to better benchmark and make more informed investment and resourcing decisions for your organization.

As with past Real Rate Reports, all of the data analyzed are from corporations' and law firms' e-billing and time management solutions. We have included lawyer and paralegal rate data filtered by specific practice and sub-practice areas, metropolitan areas, and types of matters to give legal departments and law firms greater ability to pinpoint areas of opportunity.

We strive to make the Real Rate Report a valuable and actionable reference tool for legal departments and law firms. As always, we welcome your comments and suggestions on what information would make this publication more valuable to you. We thank you for making Wolters Kluwer's ELM Solutions your trusted partner for legal industry domain expertise, data, and analytics and look forward to continuing to provide market-leading, expert solutions that deliver the best business outcomes for collaboration among legal departments and law firms.

Sincerely,



**Jonah Paransky**

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



## How to Use this Report

### The 2020 Real Rate Report:

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

All the analyses included in the report derive from the actual rates charged by law firm professionals as recorded on invoices submitted and approved for payment.

Examining real, approved rate information, along with the ranges of those rates and their changes over time, highlights the role these variables play in driving aggregate legal cost and income. The analyses can energize questions for both corporate clients and law firm principals.

Clients might ask whether they are paying the right amount for different types of legal services, while law firm principals might ask whether they are charging the right amount for legal services and whether to modify their pricing approach.

### Some key factors<sup>1</sup> that drive rates<sup>2</sup>:

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

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

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

<sup>1</sup> Source: 2018 RRR. Factor order validated in multiple analyses since 2010

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

## How to Use this Report

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

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

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



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# Section I: High-Level Data Cuts



## Section I: High-Level Data Cuts

### Partners, Associates, and Paralegals

By Role

2019 -- Real Rates

Trend Analysis (Mean)

Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Partner	14142	\$400	\$610	\$894	\$680	\$659	\$630
Associate	14341	\$295	\$425	\$615	\$479	\$462	\$439
Paralegal	6431	\$150	\$213	\$289	\$225	\$211	\$201

## Section I: High-Level Data Cuts

### Detailed Practice Areas

By Matter Type

2019 -- Real Rates for Partners, Associates, and Paralegals

Trend Analysis (Mean)

Practice Area	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Bankruptcy and Collections	Litigation	Partner	385	\$310	\$400	\$525	\$462	\$418	\$396
		Associate	330	\$250	\$300	\$395	\$359	\$319	\$270
		Paralegal	218	\$129	\$185	\$229	\$196	\$168	\$153
	Non-Litigation	Partner	313	\$325	\$394	\$495	\$448	\$405	\$394
		Associate	214	\$235	\$290	\$384	\$334	\$302	\$289
		Paralegal	129	\$125	\$183	\$220	\$182	\$172	\$158
Commercial	Litigation	Partner	1078	\$385	\$580	\$830	\$641	\$602	\$605
		Associate	1004	\$285	\$375	\$537	\$430	\$407	\$398
		Paralegal	522	\$175	\$235	\$295	\$242	\$209	\$202
	Non-Litigation	Partner	896	\$478	\$655	\$902	\$729	\$691	\$681
		Associate	698	\$350	\$440	\$598	\$512	\$485	\$484
		Paralegal	237	\$175	\$248	\$334	\$267	\$235	\$228
Corporate: Antitrust and Competition	Litigation	Partner	139	\$645	\$757	\$920	\$780	\$746	\$720
		Associate	150	\$390	\$512	\$660	\$530	\$481	\$480
		Paralegal	71	\$232	\$267	\$304	\$262	\$262	\$248
	Non-Litigation	Partner	125	\$799	\$979	\$1,249	\$1,024	\$929	\$875
		Associate	235	\$456	\$595	\$796	\$625	\$553	\$542
		Paralegal	67	\$275	\$310	\$331	\$301	\$275	\$263
Corporate: Corporate Development	Non-Litigation	Partner	42	\$520	\$850	\$1,272	\$905	\$871	\$653
		Associate	22	\$340	\$598	\$751	\$559	\$512	\$348
Corporate: Information and Technology	Non-Litigation	Partner	26	\$536	\$675	\$949	\$780	\$687	\$652
		Associate	31	\$363	\$441	\$582	\$477	\$396	\$412
Corporate: Mergers, Acquisitions and Divestitures	Litigation	Partner	58	\$477	\$628	\$920	\$702	\$539	\$648
		Associate	63	\$308	\$450	\$585	\$466	\$383	\$432
		Paralegal	17	\$215	\$285	\$295	\$255	\$201	\$226
	Non-Litigation	Partner	664	\$652	\$912	\$1,225	\$938	\$941	\$855
		Associate	769	\$415	\$590	\$830	\$617	\$600	\$549
		Paralegal	274	\$250	\$333	\$360	\$315	\$195	\$265

## Section I: High-Level Data Cuts

### Detailed Practice Areas

By Matter Type

2019 -- Real Rates for Partners, Associates, and Paralegals

Trend Analysis (Mean)

Practice Area	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Corporate: Other	Litigation	Partner	1114	\$450	\$640	\$830	\$676	\$669	\$592
		Associate	999	\$322	\$430	\$561	\$458	\$445	\$401
		Paralegal	437	\$174	\$220	\$293	\$231	\$226	\$206
	Non-Litigation	Partner	2042	\$519	\$793	\$1,010	\$801	\$767	\$736
		Associate	1956	\$375	\$511	\$685	\$549	\$518	\$490
		Paralegal	738	\$170	\$242	\$345	\$248	\$248	\$231
Corporate: Partnerships and Joint Ventures	Non-Litigation	Partner	77	\$920	\$1,249	\$1,249	\$1,126	\$1,048	\$953
		Associate	81	\$612	\$847	\$847	\$740	\$692	\$602
Corporate: Regulatory and Compliance	Litigation	Partner	457	\$602	\$786	\$973	\$804	\$778	\$740
		Associate	447	\$385	\$499	\$660	\$530	\$512	\$484
		Paralegal	226	\$195	\$250	\$295	\$249	\$263	\$242
	Non-Litigation	Partner	1059	\$515	\$680	\$910	\$730	\$721	\$687
		Associate	874	\$336	\$455	\$620	\$501	\$497	\$468
		Paralegal	265	\$175	\$230	\$282	\$239	\$231	\$218
Corporate: Tax	Litigation	Partner	27	\$390	\$465	\$500	\$523	\$557	\$582
		Associate	12	\$248	\$310	\$386	\$385	\$444	\$344
		Paralegal	15	\$160	\$165	\$228	\$173	\$176	\$191
	Non-Litigation	Partner	344	\$590	\$828	\$1,051	\$873	\$814	\$801
		Associate	336	\$419	\$566	\$703	\$588	\$547	\$540
		Paralegal	101	\$213	\$280	\$370	\$294	\$234	\$204
Corporate: Treasury	Non-Litigation	Partner	45	\$713	\$1,041	\$1,200	\$998	\$991	\$932
		Associate	40	\$315	\$499	\$714	\$522	\$528	\$522
Corporate: White Collar/Fraud/Abuse - Internal Only	Litigation	Partner	18	\$525	\$1,120	\$1,120	\$818	\$839	\$786
		Associate	21	\$235	\$512	\$728	\$495	\$516	\$513
Employment and Labor: ADA	Litigation	Partner	24	\$300	\$375	\$495	\$410	\$432	\$430
		Associate	28	\$300	\$330	\$394	\$330	\$300	\$343
		Paralegal	16	\$165	\$183	\$228	\$201	\$179	\$173
Employment and Labor: Agreements	Litigation	Partner	45	\$410	\$595	\$795	\$651	\$644	\$714
		Associate	48	\$319	\$462	\$587	\$510	\$470	\$567
		Paralegal	11	\$188	\$225	\$258	\$230	\$261	\$298
	Non-Litigation	Partner	70	\$395	\$593	\$761	\$579	\$514	\$475
		Associate	45	\$266	\$352	\$438	\$365	\$349	\$343
		Paralegal	18	\$144	\$158	\$199	\$178	\$164	\$165



## Section I: High-Level Data Cuts

### Detailed Practice Areas

By Matter Type

2019 -- Real Rates for Partners, Associates, and Paralegals

Trend Analysis (Mean)

Practice Area	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Employment and Labor: Compensation and Benefits	Litigation	Partner	53	\$370	\$515	\$660	\$568	\$656	\$601
		Associate	40	\$285	\$290	\$345	\$336	\$406	\$505
		Paralegal	18	\$143	\$159	\$242	\$191	\$208	\$212
	Non-Litigation	Partner	247	\$533	\$648	\$787	\$690	\$672	\$678
		Associate	107	\$313	\$404	\$517	\$419	\$407	\$420
		Paralegal	33	\$180	\$228	\$293	\$239	\$210	\$204
Employment and Labor: Discrimination, Retaliation and Harassment / EEO	Litigation	Partner	306	\$350	\$435	\$531	\$468	\$465	\$424
		Associate	332	\$285	\$315	\$367	\$328	\$332	\$317
		Paralegal	187	\$150	\$183	\$225	\$184	\$179	\$167
	Non-Litigation	Partner	207	\$385	\$450	\$540	\$476	\$474	\$459
		Associate	219	\$289	\$319	\$360	\$330	\$333	\$321
		Paralegal	93	\$154	\$195	\$220	\$194	\$185	\$180
Employment and Labor: Employee Dishonesty/Misconduct	Litigation	Partner	19	\$525	\$845	\$995	\$789	\$605	\$646
		Associate	17	\$370	\$450	\$480	\$443	\$409	\$380
Employment and Labor: ERISA	Litigation	Partner	31	\$480	\$580	\$762	\$687	\$597	\$622
		Associate	12	\$319	\$354	\$496	\$444	\$388	\$395
	Non-Litigation	Partner	75	\$430	\$610	\$799	\$648	\$640	\$614
		Associate	41	\$320	\$400	\$525	\$472	\$427	\$422
		Paralegal	12	\$229	\$270	\$320	\$270	\$244	\$282
Employment and Labor: Immigration	Non-Litigation	Partner	32	\$435	\$566	\$716	\$595	\$558	\$618
		Associate	20	\$300	\$330	\$405	\$357	\$385	\$406
		Paralegal	37	\$169	\$197	\$225	\$195	\$202	\$190
Employment and Labor: OFCCP	Non-Litigation	Partner	14	\$485	\$575	\$663	\$579	\$585	\$605
Employment and Labor: Other	Litigation	Partner	486	\$441	\$585	\$750	\$626	\$625	\$622
		Associate	418	\$302	\$385	\$574	\$437	\$453	\$444
		Paralegal	241	\$170	\$215	\$270	\$219	\$213	\$214
	Non-Litigation	Partner	763	\$428	\$540	\$685	\$589	\$583	\$565
		Associate	571	\$296	\$356	\$447	\$405	\$409	\$387
		Paralegal	167	\$160	\$201	\$265	\$227	\$216	\$206

## Section I: High-Level Data Cuts

### Detailed Practice Areas

By Matter Type

## 2019 -- Real Rates for Partners, Associates, and Paralegals

## Trend Analysis (Mean)

Practice Area	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Employment and Labor: Union Relations and Negotiations / NLRB	Litigation	Partner	69	\$396	\$510	\$650	\$546	\$559	\$558
		Associate	57	\$290	\$320	\$385	\$335	\$344	\$361
		Paralegal	28	\$169	\$188	\$236	\$215	\$204	\$189
	Non-Litigation	Partner	149	\$423	\$500	\$640	\$541	\$512	\$478
		Associate	86	\$325	\$358	\$399	\$372	\$359	\$345
		Paralegal	19	\$150	\$200	\$275	\$225	\$189	\$176
Employment and Labor: Wages, Tips and Overtime	Litigation	Partner	51	\$350	\$435	\$554	\$451	\$455	\$427
		Associate	43	\$285	\$295	\$388	\$331	\$358	\$369
		Paralegal	24	\$144	\$173	\$213	\$181	\$176	\$179
	Non-Litigation	Partner	28	\$373	\$497	\$655	\$542	\$456	\$486
		Associate	16	\$360	\$390	\$401	\$388	\$369	\$351
Employment and Labor: Wrongful Termination	Litigation	Partner	54	\$415	\$524	\$654	\$582	\$486	\$449
		Associate	45	\$290	\$299	\$378	\$340	\$355	\$326
		Paralegal	42	\$150	\$180	\$254	\$210	\$194	\$183
	Non-Litigation	Partner	40	\$406	\$450	\$592	\$476	\$489	\$460
		Associate	28	\$295	\$312	\$365	\$321	\$321	\$333
		Paralegal	18	\$185	\$200	\$250	\$211	\$224	\$179
Environmental	Litigation	Partner	103	\$395	\$529	\$623	\$535	\$420	\$433
		Associate	54	\$305	\$350	\$424	\$360	\$279	\$274
		Paralegal	25	\$185	\$206	\$238	\$218	\$146	\$142
	Non-Litigation	Partner	125	\$411	\$530	\$650	\$564	\$651	\$575
		Associate	64	\$260	\$342	\$439	\$381	\$454	\$393
		Paralegal	34	\$220	\$225	\$285	\$248	\$240	\$216
Finance and Securities: Debt/Equity Offerings	Non-Litigation	Partner	171	\$687	\$944	\$1,209	\$946	\$918	\$874
		Associate	166	\$425	\$564	\$755	\$605	\$582	\$583
		Paralegal	46	\$243	\$262	\$350	\$281	\$285	\$282
Finance and Securities: Fiduciary Services	Litigation	Partner	75	\$514	\$675	\$855	\$709	\$712	\$803
		Associate	56	\$296	\$395	\$468	\$391	\$456	\$474
		Paralegal	35	\$173	\$200	\$244	\$208	\$231	\$243
	Non-Litigation	Partner	54	\$455	\$587	\$843	\$665	\$679	\$638
		Associate	24	\$268	\$328	\$482	\$407	\$360	\$402

## Section I: High-Level Data Cuts

### Detailed Practice Areas

By Matter Type

2019 -- Real Rates for Partners, Associates, and Paralegals

Trend Analysis (Mean)

Practice Area	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Finance and Securities: Investments and Other Financial Instruments	Litigation	Partner	68	\$804	\$905	\$1,125	\$943	\$970	\$950
		Associate	91	\$396	\$565	\$648	\$554	\$570	\$590
		Paralegal	61	\$170	\$213	\$285	\$216	\$174	\$278
	Non-Litigation	Partner	1168	\$730	\$928	\$1,195	\$959	\$957	\$952
		Associate	1332	\$466	\$641	\$810	\$652	\$645	\$635
		Paralegal	406	\$210	\$275	\$338	\$277	\$276	\$276
Finance and Securities: Loans and Financing	Litigation	Partner	117	\$334	\$463	\$607	\$539	\$526	\$613
		Associate	160	\$275	\$310	\$397	\$364	\$377	\$345
		Paralegal	75	\$145	\$208	\$242	\$205	\$194	\$185
	Non-Litigation	Partner	1154	\$525	\$810	\$1,175	\$862	\$828	\$803
		Associate	1103	\$415	\$576	\$808	\$606	\$585	\$567
		Paralegal	462	\$200	\$275	\$360	\$280	\$270	\$256
Finance and Securities: Other	Non-Litigation	Partner	55	\$611	\$1,115	\$1,249	\$951	\$807	\$799
		Associate	52	\$495	\$740	\$847	\$665	\$546	\$532
		Paralegal	19	\$122	\$240	\$318	\$241	\$206	\$209
Finance and Securities: SEC Filings and Financial Reporting	Litigation	Partner	22	\$759	\$975	\$1,045	\$932	\$838	\$882
		Associate	16	\$466	\$608	\$749	\$600	\$522	\$545
	Non-Litigation	Partner	110	\$653	\$1,058	\$1,284	\$1,014	\$884	\$859
		Associate	91	\$497	\$630	\$847	\$668	\$533	\$493
		Paralegal	35	\$250	\$325	\$435	\$335	\$286	\$237
Finance and Securities: Securities and Banking Regulations	Litigation	Partner	50	\$602	\$805	\$997	\$831	\$862	\$803
		Associate	59	\$401	\$482	\$637	\$508	\$539	\$508
		Paralegal	25	\$153	\$202	\$250	\$222	\$254	\$258
	Non-Litigation	Partner	56	\$715	\$1,020	\$1,330	\$1,011	\$912	\$936
		Associate	33	\$425	\$565	\$702	\$581	\$558	\$578
General Liability: Asbestos/Mesothelioma	Litigation	Partner	128	\$225	\$295	\$358	\$346	\$312	\$272
		Associate	134	\$175	\$225	\$251	\$247	\$245	\$225
		Paralegal	129	\$100	\$115	\$125	\$128	\$115	\$106
	Non-Litigation	Partner	24	\$225	\$293	\$336	\$352	\$346	\$353
		Associate	36	\$170	\$215	\$265	\$239	\$264	\$249
		Paralegal	42	\$100	\$115	\$145	\$137	\$142	\$128
General Liability: Auto and Transportation	Litigation	Partner	32	\$190	\$253	\$346	\$285	\$301	\$252
		Associate	22	\$166	\$200	\$240	\$217	\$210	\$201
		Paralegal	23	\$95	\$110	\$215	\$153	\$139	\$118

## Section I: High-Level Data Cuts

### Detailed Practice Areas

By Matter Type

2019 -- Real Rates for Partners, Associates, and Paralegals

Trend Analysis (Mean)

Practice Area	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
General Liability: Consumer Related Claims	Litigation	Partner	63	\$290	\$467	\$665	\$504	\$458	\$462
		Associate	58	\$245	\$327	\$472	\$364	\$338	\$322
		Paralegal	26	\$100	\$128	\$223	\$158	\$189	\$177
General Liability: Crime, Dishonesty and Fraud	Litigation	Partner	37	\$395	\$525	\$575	\$508	\$562	\$612
		Associate	33	\$320	\$350	\$405	\$372	\$425	\$437
		Paralegal	25	\$185	\$215	\$248	\$216	\$240	\$211
	Non-Litigation	Partner	16	\$594	\$761	\$833	\$701	\$703	\$601
General Liability: Other	Litigation	Partner	90	\$190	\$625	\$880	\$606	\$490	\$434
		Associate	128	\$199	\$477	\$568	\$448	\$333	\$281
	Non-Litigation	Partner	32	\$285	\$450	\$698	\$532	\$470	\$451
		Associate	23	\$265	\$350	\$548	\$417	\$292	\$306
		Paralegal	12	\$146	\$177	\$246	\$207	\$147	\$138
General Liability: Personal Injury/Wrongful Death	Litigation	Partner	293	\$185	\$225	\$386	\$325	\$277	\$260
		Associate	257	\$165	\$185	\$275	\$237	\$201	\$191
		Paralegal	240	\$90	\$100	\$116	\$117	\$106	\$102
General Liability: Premises	Litigation	Partner	74	\$263	\$353	\$500	\$400	\$401	\$329
		Associate	58	\$208	\$255	\$325	\$281	\$271	\$229
		Paralegal	55	\$115	\$154	\$190	\$155	\$152	\$125
General Liability: Product and Product Liability	Litigation	Partner	435	\$295	\$400	\$588	\$468	\$463	\$419
		Associate	389	\$225	\$285	\$380	\$326	\$313	\$289
		Paralegal	350	\$122	\$150	\$210	\$167	\$171	\$152
	Non-Litigation	Partner	58	\$210	\$250	\$375	\$311	\$360	\$371
		Associate	59	\$200	\$250	\$310	\$282	\$268	\$271
		Paralegal	30	\$95	\$110	\$162	\$140	\$136	\$159
General Liability: Property Damage	Litigation	Partner	50	\$383	\$548	\$635	\$544	\$512	\$472
		Associate	43	\$283	\$325	\$395	\$352	\$296	\$387
		Paralegal	20	\$136	\$185	\$225	\$196	\$212	\$204
General Liability: Toxic Tort	Litigation	Associate	27	\$225	\$252	\$425	\$355	\$363	\$286

## Section I: High-Level Data Cuts

### Detailed Practice Areas

By Matter Type

2019 -- Real Rates for Partners, Associates, and Paralegals

Trend Analysis (Mean)

Practice Area	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Government Relations	Non-Litigation	Partner	83	\$619	\$768	\$883	\$775	\$781	\$694
		Associate	72	\$392	\$497	\$629	\$538	\$573	\$453
		Paralegal	15	\$258	\$285	\$425	\$323	\$246	\$289
Insurance Defense: Asbestos/Mesothelioma	Litigation	Partner	27	\$160	\$160	\$168	\$182	\$238	\$239
		Paralegal	15	\$83	\$85	\$88	\$92	\$132	\$129
Insurance Defense: Auto and Transportation	Litigation	Partner	555	\$157	\$167	\$175	\$170	\$174	\$180
		Associate	510	\$140	\$150	\$160	\$150	\$152	\$154
		Paralegal	444	\$80	\$89	\$90	\$86	\$85	\$85
Insurance Defense: Errors and Omissions	Litigation	Partner	166	\$175	\$190	\$215	\$201	\$219	\$204
		Associate	89	\$150	\$165	\$185	\$167	\$182	\$177
Insurance Defense: Other	Litigation	Partner	632	\$165	\$175	\$200	\$201	\$211	\$214
		Associate	490	\$149	\$159	\$175	\$177	\$176	\$175
		Paralegal	380	\$80	\$90	\$95	\$95	\$98	\$94
Insurance Defense: Personal Injury/Wrongful Death	Litigation	Partner	272	\$150	\$175	\$200	\$188	\$197	\$195
		Associate	290	\$136	\$150	\$173	\$157	\$167	\$166
		Paralegal	177	\$75	\$85	\$85	\$84	\$89	\$88
Insurance Defense: Product and Product Liability	Litigation	Partner	188	\$170	\$185	\$208	\$198	\$303	\$278
		Associate	164	\$155	\$175	\$180	\$173	\$220	\$191
		Paralegal	98	\$80	\$95	\$100	\$95	\$105	\$100
Insurance Defense: Professional Liability	Litigation	Partner	341	\$180	\$200	\$250	\$234	\$228	\$227
		Associate	220	\$159	\$180	\$215	\$201	\$192	\$194
		Paralegal	131	\$80	\$90	\$113	\$104	\$96	\$97
Insurance Defense: Property Damage	Litigation	Partner	398	\$165	\$185	\$210	\$211	\$212	\$205
		Associate	382	\$150	\$167	\$180	\$178	\$174	\$171
		Paralegal	210	\$80	\$90	\$100	\$95	\$95	\$93
Insurance Defense: Toxic Tort	Litigation	Partner	19	\$168	\$204	\$240	\$218	\$264	\$234
Insurance Policies and Coverage: Policy Coverage Dispute	Litigation	Partner	16	\$315	\$510	\$536	\$479	\$396	\$294
Intellectual Property: Copyrights	Non-Litigation	Partner	11	\$673	\$703	\$872	\$767	\$734	\$695

## Section I: High-Level Data Cuts

### Detailed Practice Areas

By Matter Type

2019 -- Real Rates for Partners, Associates, and Paralegals

Trend Analysis (Mean)

Practice Area	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Intellectual Property: Licensing	Litigation	Partner	55	\$843	\$1,000	\$1,190	\$1,006	\$912	\$933
		Associate	67	\$603	\$780	\$875	\$734	\$641	\$651
	Non-Litigation	Partner	82	\$800	\$1,000	\$1,219	\$992	\$948	\$904
		Associate	180	\$564	\$675	\$840	\$672	\$595	\$593
Intellectual Property: Other	Litigation	Partner	65	\$575	\$672	\$930	\$744	\$632	\$560
		Associate	73	\$383	\$511	\$684	\$527	\$478	\$425
		Paralegal	55	\$212	\$264	\$314	\$266	\$225	\$204
	Non-Litigation	Partner	187	\$426	\$548	\$775	\$615	\$549	\$566
		Associate	169	\$276	\$370	\$512	\$405	\$357	\$349
		Paralegal	82	\$155	\$200	\$258	\$208	\$197	\$191
Intellectual Property: Patents	Litigation	Partner	455	\$556	\$775	\$970	\$769	\$763	\$728
		Associate	470	\$417	\$521	\$685	\$539	\$524	\$497
		Paralegal	274	\$200	\$260	\$325	\$265	\$251	\$245
	Non-Litigation	Partner	548	\$372	\$492	\$714	\$561	\$559	\$520
		Associate	568	\$270	\$327	\$459	\$385	\$375	\$359
		Paralegal	342	\$152	\$204	\$253	\$217	\$216	\$202
Intellectual Property: Trademarks	Litigation	Partner	26	\$461	\$601	\$673	\$586	\$582	\$622
		Associate	18	\$340	\$410	\$541	\$440	\$392	\$381
		Paralegal	18	\$211	\$249	\$264	\$239	\$222	\$205
	Non-Litigation	Partner	154	\$456	\$570	\$727	\$610	\$581	\$595
		Associate	130	\$300	\$366	\$490	\$397	\$385	\$381
		Paralegal	110	\$195	\$230	\$285	\$237	\$218	\$210
Miscellaneous: Billing or Administrative Matter	Non-Litigation	Partner	48	\$788	\$921	\$1,035	\$924	\$1,033	\$981
		Associate	47	\$503	\$602	\$707	\$595	\$647	\$726
Miscellaneous: General Advice & Counsel	Non-Litigation	Partner	100	\$600	\$808	\$1,096	\$867	\$741	\$629
		Associate	63	\$370	\$510	\$660	\$554	\$480	\$419
		Paralegal	33	\$290	\$430	\$430	\$358	\$252	\$200
Real Estate: Commercial	Non-Litigation	Partner	28	\$360	\$400	\$462	\$423	\$431	\$436
Real Estate: Construction/Development	Litigation	Partner	14	\$361	\$489	\$526	\$452	\$477	\$490
	Non-Litigation	Partner	20	\$414	\$529	\$703	\$552	\$513	\$556
Real Estate: Easement and Right of Way	Non-Litigation	Partner	17	\$350	\$415	\$655	\$492	\$399	\$398

## Section I: High-Level Data Cuts

### Detailed Practice Areas

By Matter Type

## 2019 -- Real Rates for Partners, Associates, and Paralegals

## Trend Analysis (Mean)

Practice Area	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Real Estate: Land Use/Zoning/Restrictive Covenants	Litigation	Partner	16	\$521	\$603	\$668	\$590	\$592	\$510
		Associate	36	\$299	\$351	\$430	\$373	\$375	\$332
	Non-Litigation	Partner	64	\$425	\$524	\$704	\$587	\$571	\$515
		Paralegal	17	\$195	\$200	\$252	\$224	\$211	\$214
Real Estate: Landlord/Tenant Issues	Litigation	Partner	34	\$278	\$344	\$381	\$351	\$331	\$330
		Associate	35	\$242	\$275	\$298	\$279	\$251	\$243
		Paralegal	17	\$100	\$125	\$128	\$134	\$144	\$141
Real Estate: Leasing	Litigation	Partner	26	\$206	\$283	\$386	\$324	\$326	\$339
		Associate	21	\$185	\$235	\$295	\$256	\$215	\$255
	Non-Litigation	Partner	125	\$380	\$479	\$653	\$531	\$495	\$476
		Associate	102	\$288	\$350	\$488	\$394	\$331	\$319
		Paralegal	39	\$150	\$185	\$221	\$197	\$197	\$187
Real Estate: Other	Litigation	Partner	101	\$392	\$525	\$655	\$546	\$552	\$500
		Associate	72	\$284	\$350	\$486	\$418	\$372	\$343
		Paralegal	43	\$193	\$215	\$251	\$224	\$208	\$188
	Non-Litigation	Partner	166	\$366	\$469	\$550	\$513	\$483	\$485
		Associate	96	\$280	\$325	\$425	\$390	\$340	\$331
		Paralegal	39	\$166	\$185	\$252	\$210	\$201	\$201
Real Estate: Property/Land Acquisition or Divestiture	Litigation	Partner	46	\$190	\$200	\$235	\$233	\$214	\$200
		Associate	86	\$300	\$383	\$491	\$420	\$421	\$348
	Non-Litigation	Partner	152	\$475	\$588	\$754	\$645	\$560	\$547
		Paralegal	42	\$178	\$234	\$290	\$234	\$217	\$203
Real Estate: Titles	Litigation	Partner	454	\$250	\$300	\$360	\$317	\$306	\$299
		Associate	323	\$200	\$240	\$280	\$247	\$232	\$227
		Paralegal	232	\$115	\$135	\$160	\$144	\$131	\$126
	Non-Litigation	Partner	916	\$250	\$295	\$350	\$318	\$312	\$305
		Associate	715	\$200	\$235	\$275	\$252	\$241	\$239
		Paralegal	480	\$100	\$125	\$160	\$138	\$134	\$133
Requests for Information: Subpoena	Litigation	Partner	135	\$437	\$640	\$816	\$662	\$632	\$573
		Associate	132	\$321	\$439	\$570	\$462	\$451	\$388
		Paralegal	106	\$142	\$220	\$295	\$225	\$207	\$228
	Non-Litigation	Partner	21	\$500	\$600	\$802	\$699	\$578	\$590
		Associate	18	\$276	\$368	\$545	\$428	\$369	\$481

## Section I: High-Level Data Cuts

### Cities

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

City	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Akron OH	Partner	12	\$260	\$270	\$340	\$306	\$289	\$327
Albany NY	Partner	48	\$265	\$310	\$350	\$325	\$312	\$303
	Associate	32	\$220	\$233	\$250	\$239	\$237	\$217
Albuquerque NM	Partner	19	\$210	\$315	\$325	\$282	\$279	\$277
Atlanta GA	Partner	418	\$375	\$554	\$725	\$575	\$552	\$535
	Associate	444	\$275	\$348	\$491	\$383	\$379	\$349
Atlantic City NJ	Partner	12	\$280	\$295	\$425	\$358	\$376	\$356
Austin TX	Partner	97	\$372	\$460	\$651	\$514	\$513	\$472
	Associate	91	\$265	\$335	\$480	\$376	\$336	\$318
Baltimore MD	Partner	195	\$438	\$625	\$776	\$619	\$585	\$555
	Associate	240	\$325	\$405	\$540	\$435	\$417	\$408
Baton Rouge LA	Partner	22	\$290	\$355	\$400	\$348	\$345	\$278
	Associate	12	\$163	\$215	\$265	\$216	\$226	\$193
Birmingham AL	Partner	134	\$315	\$370	\$450	\$383	\$369	\$357
	Associate	114	\$253	\$285	\$323	\$291	\$261	\$243
Boise City ID	Partner	17	\$225	\$270	\$305	\$286	\$282	\$296
	Associate	15	\$167	\$185	\$252	\$237	\$201	\$202
Boston MA	Partner	371	\$410	\$650	\$833	\$645	\$648	\$656
	Associate	423	\$325	\$425	\$587	\$458	\$460	\$475
Bridgeport CT	Partner	28	\$319	\$433	\$502	\$424	\$419	\$406
	Associate	24	\$200	\$265	\$295	\$263	\$262	\$276
Buffalo NY	Partner	69	\$340	\$340	\$350	\$348	\$331	\$314
	Associate	44	\$237	\$250	\$265	\$246	\$242	\$227
Burlington VT	Partner	12	\$214	\$269	\$376	\$293	\$258	\$267
Charleston SC	Partner	18	\$284	\$329	\$430	\$364	\$343	\$325
	Associate	17	\$200	\$224	\$248	\$233	\$261	\$228
Charleston WV	Partner	35	\$246	\$281	\$328	\$295	\$277	\$272
	Associate	14	\$175	\$187	\$212	\$196	\$195	\$169
Charlotte NC	Partner	120	\$427	\$585	\$790	\$619	\$596	\$549
	Associate	110	\$293	\$375	\$438	\$393	\$370	\$358
Chicago IL	Partner	1039	\$574	\$770	\$980	\$783	\$736	\$701
	Associate	1110	\$371	\$487	\$635	\$509	\$470	\$439
Cincinnati OH	Partner	69	\$365	\$425	\$515	\$445	\$439	\$413
	Associate	69	\$232	\$257	\$295	\$271	\$259	\$249



# Section I: High-Level Data Cuts

## Cities

### 2019 -- Real Rates for Partners and Associates

### Trend Analysis (Mean)

City	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Cleveland OH	Partner	255	\$365	\$450	\$573	\$492	\$503	\$477
	Associate	244	\$230	\$290	\$350	\$300	\$305	\$283
Columbia SC	Partner	42	\$305	\$375	\$435	\$378	\$392	\$375
	Associate	36	\$200	\$250	\$280	\$254	\$246	\$245
Columbus OH	Partner	67	\$387	\$473	\$590	\$482	\$461	\$423
	Associate	42	\$235	\$250	\$320	\$277	\$307	\$288
Dallas TX	Partner	259	\$364	\$525	\$850	\$607	\$601	\$602
	Associate	334	\$310	\$450	\$625	\$475	\$469	\$452
Dayton OH	Partner	21	\$350	\$375	\$450	\$405	\$405	\$424
Denver CO	Partner	181	\$385	\$465	\$544	\$488	\$476	\$452
	Associate	149	\$265	\$300	\$360	\$318	\$313	\$300
Des Moines IA	Partner	18	\$298	\$555	\$610	\$483	\$476	\$369
	Associate	12	\$313	\$395	\$430	\$372	\$304	\$243
Detroit MI	Partner	145	\$300	\$360	\$444	\$362	\$351	\$361
	Associate	98	\$209	\$250	\$296	\$260	\$242	\$252
Fresno CA	Partner	15	\$295	\$350	\$408	\$356	\$334	\$322
Grand Rapids MI	Partner	21	\$350	\$372	\$430	\$380	\$394	\$408
Greenville SC	Partner	35	\$380	\$435	\$475	\$439	\$406	\$389
	Associate	28	\$275	\$300	\$360	\$321	\$283	\$267
Harrisburg PA	Partner	13	\$303	\$395	\$510	\$408	\$397	\$342
Hartford CT	Partner	65	\$365	\$475	\$580	\$506	\$477	\$446
	Associate	40	\$246	\$297	\$318	\$286	\$265	\$268
Honolulu HI	Partner	33	\$271	\$300	\$400	\$342	\$349	\$328
	Associate	21	\$179	\$200	\$208	\$204	\$187	\$183
Houston TX	Partner	205	\$450	\$655	\$886	\$681	\$648	\$626
	Associate	249	\$275	\$350	\$455	\$371	\$354	\$351
Indianapolis IN	Partner	105	\$350	\$412	\$505	\$428	\$417	\$393
	Associate	67	\$195	\$250	\$311	\$262	\$267	\$256
Jackson MS	Partner	82	\$300	\$336	\$384	\$345	\$347	\$342
	Associate	64	\$175	\$225	\$251	\$198	\$215	\$176
Jacksonville FL	Partner	26	\$295	\$333	\$400	\$357	\$325	\$323
	Associate	15	\$145	\$240	\$404	\$285	\$273	\$256
Kansas City MO	Partner	168	\$366	\$440	\$546	\$455	\$443	\$420
	Associate	177	\$262	\$290	\$326	\$292	\$276	\$265

## Section I: High-Level Data Cuts

### Cities

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

City	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Knoxville TN	Partner	15	\$230	\$250	\$335	\$318	\$256	\$263
	Associate	12	\$185	\$200	\$224	\$204	\$210	\$210
Lafayette LA	Partner	14	\$150	\$150	\$205	\$184	\$195	\$217
Las Vegas NV	Partner	42	\$300	\$400	\$575	\$438	\$444	\$410
	Associate	45	\$250	\$278	\$324	\$281	\$279	\$264
Lexington KY	Partner	15	\$295	\$325	\$371	\$333	\$319	\$313
Little Rock AR	Partner	24	\$215	\$238	\$261	\$261	\$281	\$263
Los Angeles CA	Partner	902	\$482	\$740	\$1,015	\$767	\$730	\$704
	Associate	1311	\$395	\$576	\$770	\$591	\$559	\$540
Louisville KY	Partner	21	\$322	\$350	\$418	\$369	\$331	\$356
	Associate	22	\$190	\$210	\$245	\$214	\$215	\$207
Madison WI	Partner	23	\$374	\$418	\$525	\$432	\$394	\$383
Memphis TN	Partner	36	\$275	\$330	\$414	\$340	\$342	\$347
	Associate	23	\$212	\$225	\$245	\$226	\$232	\$225
Miami FL	Partner	240	\$325	\$500	\$684	\$514	\$489	\$443
	Associate	171	\$255	\$330	\$473	\$373	\$335	\$304
Milwaukee WI	Partner	77	\$304	\$386	\$470	\$416	\$390	\$371
	Associate	54	\$238	\$277	\$314	\$282	\$265	\$264
Minneapolis MN	Partner	268	\$380	\$529	\$675	\$530	\$490	\$446
	Associate	224	\$295	\$370	\$439	\$374	\$362	\$328
Nashville TN	Partner	90	\$360	\$430	\$473	\$419	\$405	\$408
	Associate	91	\$225	\$257	\$288	\$262	\$244	\$247
New Haven CT	Partner	23	\$385	\$450	\$519	\$445	\$396	\$390
	Associate	24	\$230	\$290	\$335	\$290	\$276	\$282
New Orleans LA	Partner	105	\$285	\$347	\$425	\$358	\$347	\$296
	Associate	103	\$220	\$238	\$315	\$268	\$246	\$210
New York NY	Partner	2384	\$602	\$975	\$1,284	\$962	\$931	\$887
	Associate	3382	\$425	\$615	\$847	\$638	\$613	\$585
Oklahoma City OK	Partner	31	\$200	\$340	\$360	\$316	\$292	\$283
	Associate	18	\$165	\$203	\$239	\$221	\$209	\$196
Omaha NE	Partner	44	\$310	\$375	\$404	\$355	\$355	\$330
	Associate	20	\$186	\$249	\$255	\$236	\$215	\$208
Orlando FL	Partner	99	\$385	\$450	\$513	\$461	\$466	\$454
	Associate	90	\$230	\$276	\$335	\$284	\$270	\$282

## Section I: High-Level Data Cuts

### Cities

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

City	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Philadelphia PA	Partner	826	\$495	\$626	\$801	\$653	\$626	\$609
	Associate	853	\$309	\$380	\$475	\$403	\$379	\$367
Phoenix AZ	Partner	112	\$305	\$365	\$480	\$397	\$384	\$372
	Associate	68	\$200	\$261	\$298	\$270	\$272	\$265
Pittsburgh PA	Partner	181	\$385	\$533	\$690	\$547	\$485	\$468
	Associate	215	\$265	\$350	\$425	\$354	\$342	\$313
Portland ME	Partner	46	\$260	\$390	\$463	\$406	\$389	\$347
	Associate	21	\$184	\$225	\$280	\$234	\$231	\$224
Portland OR	Partner	125	\$365	\$436	\$550	\$458	\$428	\$423
	Associate	135	\$293	\$342	\$405	\$344	\$339	\$310
Providence RI	Partner	21	\$185	\$300	\$450	\$345	\$392	\$394
	Associate	19	\$159	\$250	\$278	\$239	\$224	\$226
Raleigh NC	Partner	54	\$311	\$425	\$483	\$422	\$404	\$387
	Associate	30	\$270	\$315	\$370	\$316	\$282	\$253
Richmond VA	Partner	104	\$510	\$610	\$727	\$609	\$577	\$516
	Associate	135	\$326	\$410	\$465	\$395	\$356	\$339
Rochester NY	Partner	24	\$263	\$347	\$410	\$354	\$329	\$315
	Associate	21	\$204	\$255	\$333	\$272	\$243	\$212
Sacramento CA	Partner	17	\$325	\$395	\$441	\$448	\$481	\$452
	Associate	14	\$313	\$335	\$353	\$324	\$321	\$332
Salt Lake City UT	Partner	54	\$283	\$400	\$432	\$379	\$378	\$359
	Associate	27	\$200	\$210	\$245	\$224	\$212	\$223
San Diego CA	Partner	131	\$264	\$410	\$966	\$583	\$560	\$512
	Associate	122	\$180	\$225	\$355	\$298	\$312	\$312
San Francisco CA	Partner	455	\$465	\$660	\$930	\$706	\$707	\$674
	Associate	360	\$320	\$415	\$590	\$476	\$457	\$451
San Jose CA	Partner	143	\$600	\$825	\$995	\$828	\$774	\$782
	Associate	108	\$350	\$500	\$654	\$534	\$521	\$503
San Juan PR	Partner	23	\$205	\$225	\$268	\$239	\$226	\$231
Savannah GA	Partner	14	\$289	\$325	\$353	\$317	\$309	\$301
Seattle WA	Partner	257	\$400	\$500	\$646	\$528	\$540	\$496
	Associate	200	\$298	\$382	\$470	\$394	\$402	\$338
St. Louis MO	Partner	145	\$317	\$408	\$516	\$420	\$377	\$353
	Associate	57	\$200	\$239	\$276	\$244	\$228	\$214

## Section I: High-Level Data Cuts

### Cities

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

City	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Syracuse NY	Partner	18	\$240	\$262	\$300	\$280	\$286	\$288
	Associate	12	\$174	\$207	\$250	\$222	\$195	\$185
Tallahassee FL	Partner	21	\$310	\$433	\$510	\$438	\$398	\$369
Tampa FL	Partner	90	\$307	\$400	\$539	\$432	\$397	\$395
	Associate	50	\$240	\$280	\$323	\$285	\$261	\$265
Toledo OH	Partner	17	\$326	\$380	\$475	\$387	\$324	\$291
Trenton NJ	Partner	36	\$450	\$520	\$625	\$526	\$492	\$512
	Associate	23	\$210	\$325	\$393	\$328	\$351	\$366
Tulsa OK	Partner	19	\$236	\$256	\$311	\$275	\$258	\$271
Virginia Beach VA	Partner	14	\$333	\$420	\$474	\$394	\$349	\$397
Washington DC	Partner	1772	\$650	\$805	\$976	\$832	\$812	\$779
	Associate	1557	\$407	\$522	\$635	\$538	\$528	\$501
Wheeling WV	Partner	32	\$680	\$796	\$890	\$771	\$782	\$756
	Associate	60	\$323	\$528	\$580	\$481	\$531	\$468

## Section I: High-Level Data Cuts

### Cities

By Matter Type

2019 -- Real Rates for Partners and Associates

Trend Analysis (Mean)

City	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Albany NY	Litigation	Partner	16	\$285	\$330	\$388	\$370	\$322	\$304
	Non-Litigation	Partner	38	\$265	\$300	\$341	\$311	\$307	\$303
		Associate	27	\$220	\$230	\$235	\$238	\$226	\$217
Albuquerque NM	Litigation	Partner	12	\$183	\$313	\$318	\$259	\$269	\$253
Atlanta GA	Litigation	Partner	207	\$350	\$469	\$670	\$525	\$525	\$502
		Associate	240	\$267	\$290	\$445	\$354	\$347	\$312
	Non-Litigation	Partner	275	\$430	\$595	\$750	\$615	\$576	\$565
		Associate	255	\$300	\$390	\$529	\$412	\$410	\$386
Atlantic City NJ	Non-Litigation	Partner	11	\$280	\$295	\$295	\$351	\$379	\$359
Austin TX	Litigation	Partner	36	\$376	\$480	\$800	\$560	\$546	\$484
		Associate	24	\$350	\$480	\$540	\$457	\$361	\$341
	Non-Litigation	Partner	75	\$372	\$428	\$558	\$494	\$497	\$468
		Associate	72	\$248	\$317	\$420	\$349	\$327	\$309
Baltimore MD	Litigation	Partner	106	\$397	\$625	\$750	\$593	\$540	\$503
		Associate	148	\$323	\$390	\$502	\$413	\$411	\$384
	Non-Litigation	Partner	112	\$450	\$639	\$794	\$643	\$628	\$602
		Associate	122	\$326	\$423	\$610	\$468	\$430	\$442
Baton Rouge LA	Litigation	Partner	15	\$287	\$310	\$378	\$340	\$303	\$259
	Non-Litigation	Partner	11	\$295	\$370	\$441	\$357	\$381	\$312
Birmingham AL	Litigation	Partner	71	\$296	\$325	\$425	\$355	\$343	\$321
		Associate	70	\$270	\$279	\$324	\$292	\$256	\$226
	Non-Litigation	Partner	78	\$330	\$420	\$470	\$413	\$409	\$410
		Associate	61	\$245	\$290	\$320	\$290	\$270	\$265
Boise City ID	Non-Litigation	Partner	11	\$245	\$260	\$274	\$290	\$289	\$278
		Associate	14	\$167	\$215	\$320	\$250	\$178	\$181
Boston MA	Litigation	Partner	144	\$300	\$560	\$734	\$554	\$552	\$530
		Associate	153	\$255	\$380	\$486	\$386	\$392	\$379
	Non-Litigation	Partner	273	\$455	\$685	\$870	\$692	\$700	\$726
		Associate	306	\$361	\$465	\$614	\$495	\$491	\$526
Bridgeport CT	Litigation	Partner	15	\$374	\$484	\$546	\$466	\$450	\$436
	Non-Litigation	Partner	18	\$268	\$365	\$448	\$382	\$387	\$389
		Associate	17	\$150	\$258	\$295	\$243	\$238	\$271

## Section I: High-Level Data Cuts

### Cities

By Matter Type

2019 -- Real Rates for Partners and Associates

Trend Analysis (Mean)

City	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Buffalo NY	Litigation	Partner	42	\$340	\$340	\$350	\$342	\$319	\$302
		Associate	32	\$245	\$253	\$265	\$247	\$244	\$228
	Non-Litigation	Partner	42	\$340	\$340	\$340	\$356	\$352	\$334
		Associate	18	\$217	\$248	\$265	\$245	\$238	\$224
Charleston SC	Non-Litigation	Partner	12	\$323	\$400	\$481	\$407	\$372	\$326
Charleston WV	Litigation	Partner	23	\$225	\$279	\$310	\$268	\$261	\$257
		Associate	11	\$175	\$180	\$208	\$185	\$182	\$170
	Non-Litigation	Partner	16	\$290	\$326	\$400	\$356	\$315	\$324
Charlotte NC	Litigation	Partner	42	\$373	\$495	\$648	\$535	\$510	\$519
		Associate	22	\$311	\$372	\$407	\$357	\$337	\$317
	Non-Litigation	Partner	93	\$478	\$600	\$823	\$658	\$631	\$573
		Associate	93	\$289	\$379	\$460	\$405	\$386	\$385
Chicago IL	Litigation	Partner	390	\$459	\$665	\$892	\$695	\$647	\$622
		Associate	415	\$285	\$431	\$600	\$466	\$428	\$387
	Non-Litigation	Partner	796	\$607	\$806	\$1,000	\$821	\$779	\$745
		Associate	801	\$395	\$510	\$639	\$530	\$494	\$474
Cincinnati OH	Litigation	Partner	33	\$391	\$475	\$561	\$468	\$436	\$413
		Associate	33	\$234	\$263	\$298	\$275	\$251	\$244
	Non-Litigation	Partner	46	\$359	\$410	\$485	\$430	\$440	\$413
		Associate	43	\$230	\$255	\$290	\$268	\$265	\$257
Cleveland OH	Litigation	Partner	103	\$365	\$475	\$608	\$512	\$490	\$463
		Associate	92	\$229	\$268	\$347	\$296	\$307	\$273
	Non-Litigation	Partner	206	\$365	\$434	\$549	\$483	\$508	\$483
		Associate	197	\$230	\$290	\$350	\$302	\$305	\$287
Columbia SC	Litigation	Partner	24	\$295	\$360	\$428	\$358	\$375	\$356
		Associate	18	\$225	\$265	\$275	\$260	\$241	\$242
	Non-Litigation	Partner	28	\$331	\$395	\$450	\$392	\$411	\$390
		Associate	23	\$200	\$240	\$295	\$248	\$252	\$250
Columbus OH	Litigation	Partner	22	\$410	\$515	\$590	\$494	\$449	\$385
		Associate	17	\$235	\$245	\$320	\$276	\$288	\$288
	Non-Litigation	Partner	53	\$373	\$470	\$554	\$475	\$466	\$443
		Associate	31	\$235	\$255	\$315	\$278	\$317	\$288

## Section I: High-Level Data Cuts

### Cities

By Matter Type

2019 -- Real Rates for Partners and Associates

Trend Analysis (Mean)

City	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Dallas TX	Litigation	Partner	96	\$274	\$420	\$573	\$470	\$492	\$486
		Associate	99	\$225	\$377	\$524	\$402	\$399	\$375
	Non-Litigation	Partner	192	\$450	\$640	\$919	\$698	\$677	\$685
		Associate	259	\$348	\$492	\$634	\$508	\$505	\$492
Dayton OH	Litigation	Partner	11	\$365	\$438	\$509	\$466	\$575	\$516
	Non-Litigation	Partner	16	\$320	\$375	\$417	\$365	\$375	\$366
Denver CO	Litigation	Partner	69	\$375	\$450	\$510	\$456	\$449	\$412
		Associate	66	\$265	\$300	\$365	\$324	\$315	\$296
	Non-Litigation	Partner	138	\$390	\$475	\$565	\$504	\$488	\$477
		Associate	104	\$270	\$300	\$360	\$315	\$311	\$303
Des Moines IA	Non-Litigation	Partner	12	\$283	\$458	\$610	\$458	\$464	\$377
Detroit MI	Litigation	Partner	62	\$297	\$360	\$430	\$351	\$325	\$327
		Associate	43	\$212	\$250	\$301	\$266	\$230	\$227
	Non-Litigation	Partner	98	\$300	\$361	\$450	\$369	\$369	\$387
		Associate	63	\$205	\$250	\$285	\$255	\$256	\$275
Grand Rapids MI	Litigation	Partner	12	\$365	\$378	\$431	\$394	\$392	\$353
	Non-Litigation	Partner	11	\$293	\$350	\$390	\$360	\$395	\$424
Greenville SC	Litigation	Partner	15	\$389	\$455	\$475	\$442	\$433	\$348
	Non-Litigation	Partner	25	\$375	\$425	\$483	\$437	\$399	\$399
		Associate	19	\$250	\$295	\$351	\$316	\$273	\$266
Hartford CT	Litigation	Partner	36	\$308	\$465	\$535	\$464	\$451	\$412
		Associate	24	\$254	\$300	\$325	\$297	\$267	\$244
	Non-Litigation	Partner	42	\$410	\$500	\$625	\$542	\$491	\$470
		Associate	21	\$226	\$250	\$313	\$272	\$262	\$285
Honolulu HI	Litigation	Partner	19	\$275	\$337	\$425	\$363	\$366	\$346
		Associate	11	\$178	\$200	\$250	\$212	\$185	\$180
	Non-Litigation	Partner	22	\$266	\$295	\$350	\$320	\$330	\$311
Houston TX	Litigation	Partner	91	\$430	\$603	\$765	\$610	\$549	\$493
		Associate	104	\$348	\$350	\$430	\$376	\$363	\$331
	Non-Litigation	Partner	144	\$469	\$744	\$940	\$728	\$712	\$725
		Associate	168	\$230	\$325	\$475	\$368	\$346	\$360

## Section I: High-Level Data Cuts

### Cities

By Matter Type

2019 -- Real Rates for Partners and Associates

Trend Analysis (Mean)

City	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Indianapolis IN	Litigation	Partner	49	\$306	\$420	\$555	\$420	\$417	\$375
		Associate	33	\$166	\$240	\$320	\$255	\$268	\$258
	Non-Litigation	Partner	67	\$357	\$410	\$502	\$434	\$417	\$406
		Associate	42	\$205	\$250	\$295	\$267	\$267	\$255
Jackson MS	Litigation	Partner	59	\$317	\$345	\$383	\$344	\$342	\$337
		Associate	55	\$105	\$225	\$250	\$188	\$212	\$171
	Non-Litigation	Partner	29	\$295	\$325	\$381	\$347	\$356	\$354
		Associate	12	\$214	\$230	\$255	\$239	\$228	\$194
Jacksonville FL	Litigation	Partner	11	\$240	\$300	\$336	\$320	\$315	\$311
		Associate	11	\$145	\$225	\$349	\$253	\$262	\$242
	Non-Litigation	Partner	15	\$318	\$358	\$413	\$389	\$349	\$344
Kansas City MO	Litigation	Partner	94	\$356	\$446	\$554	\$461	\$438	\$404
		Associate	95	\$272	\$300	\$340	\$302	\$280	\$260
	Non-Litigation	Partner	96	\$377	\$428	\$514	\$450	\$450	\$436
		Associate	105	\$250	\$275	\$314	\$280	\$270	\$271
Lafayette LA	Litigation	Partner	14	\$150	\$150	\$150	\$170	\$180	\$208
Las Vegas NV	Litigation	Partner	28	\$250	\$388	\$530	\$418	\$354	\$351
		Associate	24	\$247	\$267	\$324	\$287	\$257	\$254
	Non-Litigation	Partner	28	\$355	\$438	\$565	\$459	\$506	\$464
		Associate	29	\$250	\$282	\$320	\$276	\$296	\$273
Lexington KY	Non-Litigation	Partner	11	\$298	\$312	\$374	\$331	\$351	\$343
Little Rock AR	Non-Litigation	Partner	20	\$215	\$247	\$300	\$274	\$259	\$258
Los Angeles CA	Litigation	Partner	425	\$412	\$650	\$935	\$685	\$662	\$642
		Associate	553	\$330	\$533	\$713	\$537	\$504	\$479
	Non-Litigation	Partner	615	\$562	\$799	\$1,045	\$826	\$786	\$758
		Associate	881	\$425	\$610	\$790	\$625	\$597	\$588
Louisville KY	Litigation	Partner	17	\$301	\$343	\$406	\$353	\$327	\$346
		Associate	20	\$178	\$210	\$248	\$214	\$219	\$205
Madison WI	Non-Litigation	Partner	20	\$365	\$410	\$506	\$419	\$385	\$396
Memphis TN	Litigation	Partner	19	\$284	\$365	\$425	\$350	\$341	\$346
	Non-Litigation	Partner	24	\$275	\$320	\$365	\$326	\$342	\$350
		Associate	19	\$214	\$225	\$238	\$226	\$238	\$231



## Section I: High-Level Data Cuts

### Cities

By Matter Type

2019 -- Real Rates for Partners and Associates

Trend Analysis (Mean)

City	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Miami FL	Litigation	Partner	129	\$265	\$425	\$622	\$450	\$437	\$383
		Associate	92	\$240	\$294	\$421	\$339	\$311	\$282
	Non-Litigation	Partner	139	\$395	\$595	\$750	\$581	\$551	\$529
		Associate	92	\$291	\$380	\$489	\$407	\$368	\$346
Milwaukee WI	Litigation	Partner	29	\$304	\$375	\$420	\$388	\$344	\$326
		Associate	23	\$203	\$260	\$333	\$271	\$238	\$242
	Non-Litigation	Partner	53	\$305	\$400	\$480	\$433	\$427	\$405
		Associate	36	\$250	\$280	\$310	\$288	\$282	\$281
Minneapolis MN	Litigation	Partner	113	\$350	\$400	\$605	\$478	\$452	\$417
		Associate	92	\$295	\$370	\$403	\$357	\$333	\$279
	Non-Litigation	Partner	183	\$409	\$576	\$696	\$559	\$525	\$474
		Associate	143	\$295	\$370	\$468	\$385	\$388	\$370
Nashville TN	Litigation	Partner	34	\$295	\$375	\$450	\$377	\$375	\$386
		Associate	22	\$200	\$210	\$219	\$212	\$236	\$244
	Non-Litigation	Partner	65	\$379	\$438	\$479	\$435	\$418	\$417
		Associate	74	\$230	\$279	\$290	\$272	\$247	\$249
New Haven CT	Litigation	Partner	13	\$385	\$443	\$504	\$435	\$405	\$389
		Associate	16	\$224	\$270	\$294	\$269	\$265	\$248
	Non-Litigation	Partner	14	\$373	\$468	\$550	\$454	\$391	\$390
		Associate	11	\$290	\$325	\$345	\$312	\$285	\$293
New Orleans LA	Litigation	Partner	67	\$285	\$325	\$395	\$340	\$332	\$275
		Associate	71	\$225	\$238	\$325	\$273	\$253	\$207
	Non-Litigation	Partner	52	\$280	\$370	\$500	\$385	\$372	\$352
		Associate	44	\$220	\$235	\$300	\$259	\$231	\$220
New York NY	Litigation	Partner	909	\$475	\$700	\$1,020	\$757	\$746	\$686
		Associate	1088	\$315	\$459	\$665	\$511	\$493	\$465
	Non-Litigation	Partner	1773	\$735	\$1,100	\$1,350	\$1,055	\$1,016	\$980
		Associate	2588	\$486	\$675	\$855	\$686	\$660	\$633
Oklahoma City OK	Litigation	Partner	17	\$200	\$225	\$350	\$285	\$278	\$264
	Non-Litigation	Partner	18	\$295	\$350	\$369	\$348	\$306	\$304
Omaha NE	Litigation	Partner	13	\$310	\$395	\$395	\$349	\$368	\$296
	Non-Litigation	Partner	38	\$310	\$375	\$415	\$357	\$351	\$344
		Associate	16	\$185	\$248	\$255	\$236	\$213	\$210

## Section I: High-Level Data Cuts

### Cities

By Matter Type

2019 -- Real Rates for Partners and Associates

Trend Analysis (Mean)

City	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Orlando FL	Litigation	Partner	36	\$405	\$450	\$510	\$454	\$423	\$392
		Associate	56	\$220	\$273	\$328	\$270	\$248	\$253
	Non-Litigation	Partner	78	\$378	\$431	\$540	\$466	\$500	\$496
		Associate	47	\$234	\$278	\$353	\$300	\$301	\$323
Philadelphia PA	Litigation	Partner	419	\$450	\$600	\$765	\$613	\$586	\$553
		Associate	454	\$300	\$369	\$465	\$387	\$363	\$348
	Non-Litigation	Partner	556	\$516	\$655	\$825	\$683	\$667	\$666
		Associate	496	\$320	\$383	\$480	\$418	\$399	\$391
Phoenix AZ	Litigation	Partner	43	\$256	\$368	\$530	\$415	\$383	\$370
		Associate	24	\$180	\$223	\$298	\$266	\$262	\$269
	Non-Litigation	Partner	83	\$318	\$365	\$474	\$388	\$385	\$372
		Associate	49	\$223	\$270	\$296	\$271	\$277	\$263
Pittsburgh PA	Litigation	Partner	70	\$360	\$518	\$678	\$526	\$437	\$425
		Associate	105	\$249	\$326	\$395	\$330	\$326	\$291
	Non-Litigation	Partner	137	\$400	\$551	\$715	\$557	\$516	\$495
		Associate	133	\$293	\$360	\$441	\$374	\$357	\$334
Portland ME	Litigation	Partner	13	\$308	\$393	\$480	\$419	\$401	\$344
	Non-Litigation	Partner	40	\$245	\$390	\$454	\$402	\$387	\$349
		Associate	17	\$180	\$200	\$280	\$228	\$234	\$233
Portland OR	Litigation	Partner	57	\$339	\$380	\$481	\$416	\$404	\$401
		Associate	63	\$280	\$335	\$391	\$334	\$330	\$287
	Non-Litigation	Partner	89	\$400	\$486	\$594	\$481	\$444	\$438
		Associate	104	\$295	\$352	\$419	\$349	\$342	\$319
Providence RI	Non-Litigation	Partner	15	\$185	\$440	\$485	\$408	\$456	\$464
		Associate	13	\$250	\$250	\$280	\$265	\$242	\$232
Raleigh NC	Litigation	Partner	15	\$275	\$362	\$481	\$391	\$391	\$347
		Associate	11	\$234	\$308	\$406	\$317	\$265	\$245
	Non-Litigation	Partner	43	\$335	\$425	\$483	\$433	\$410	\$409
		Associate	22	\$283	\$320	\$370	\$316	\$295	\$260
Richmond VA	Litigation	Partner	45	\$488	\$582	\$679	\$561	\$506	\$423
		Associate	61	\$250	\$353	\$451	\$356	\$319	\$312
	Non-Litigation	Partner	73	\$522	\$665	\$767	\$643	\$626	\$598
		Associate	83	\$351	\$417	\$471	\$421	\$384	\$363

## Section I: High-Level Data Cuts

### Cities

By Matter Type

2019 -- Real Rates for Partners and Associates

Trend Analysis (Mean)

City	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Rochester NY	Litigation	Partner	16	\$253	\$345	\$380	\$341	\$342	\$318
		Associate	14	\$208	\$260	\$348	\$281	\$256	\$229
	Non-Litigation	Partner	11	\$295	\$356	\$430	\$374	\$318	\$312
Sacramento CA	Non-Litigation	Partner	12	\$300	\$382	\$493	\$472	\$550	\$488
Salt Lake City UT	Litigation	Partner	22	\$246	\$395	\$442	\$373	\$359	\$364
		Associate	12	\$195	\$235	\$245	\$222	\$190	\$262
	Non-Litigation	Partner	38	\$285	\$400	\$419	\$383	\$393	\$355
		Associate	16	\$200	\$210	\$238	\$226	\$216	\$214
San Diego CA	Litigation	Partner	64	\$200	\$370	\$605	\$468	\$494	\$458
		Associate	75	\$170	\$225	\$295	\$269	\$292	\$298
	Non-Litigation	Partner	94	\$320	\$650	\$1,028	\$674	\$625	\$571
		Associate	67	\$195	\$250	\$475	\$335	\$341	\$328
San Francisco CA	Litigation	Partner	201	\$395	\$641	\$943	\$681	\$656	\$633
		Associate	153	\$300	\$396	\$558	\$450	\$443	\$432
	Non-Litigation	Partner	320	\$496	\$675	\$926	\$721	\$743	\$705
		Associate	233	\$336	\$425	\$625	\$493	\$470	\$471
San Jose CA	Litigation	Partner	57	\$589	\$762	\$978	\$784	\$732	\$762
		Associate	35	\$349	\$380	\$559	\$466	\$444	\$491
	Non-Litigation	Partner	104	\$608	\$850	\$1,035	\$852	\$793	\$791
		Associate	80	\$375	\$500	\$695	\$561	\$545	\$506
San Juan PR	Litigation	Partner	11	\$196	\$215	\$225	\$215	\$212	\$213
	Non-Litigation	Partner	15	\$223	\$255	\$280	\$264	\$241	\$245
Seattle WA	Litigation	Partner	83	\$400	\$463	\$588	\$500	\$512	\$483
		Associate	88	\$299	\$415	\$470	\$405	\$409	\$331
	Non-Litigation	Partner	206	\$400	\$520	\$655	\$539	\$550	\$501
		Associate	142	\$298	\$367	\$470	\$386	\$398	\$341
St. Louis MO	Litigation	Partner	72	\$250	\$356	\$448	\$381	\$368	\$323
		Associate	40	\$190	\$225	\$250	\$230	\$217	\$206
	Non-Litigation	Partner	88	\$340	\$436	\$548	\$453	\$387	\$392
		Associate	24	\$224	\$265	\$299	\$266	\$243	\$228
Syracuse NY	Non-Litigation	Partner	12	\$264	\$295	\$359	\$310	\$311	\$307
Tallahassee FL	Non-Litigation	Partner	18	\$378	\$450	\$563	\$467	\$418	\$376

## Section I: High-Level Data Cuts

### Cities

By Matter Type

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

City	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Tampa FL	Litigation	Partner	54	\$286	\$395	\$540	\$428	\$390	\$363
		Associate	28	\$234	\$280	\$319	\$267	\$245	\$244
	Non-Litigation	Partner	49	\$310	\$413	\$538	\$438	\$405	\$431
		Associate	27	\$258	\$283	\$320	\$303	\$279	\$286
Toledo OH	Non-Litigation	Partner	15	\$337	\$380	\$475	\$392	\$342	\$294
Trenton NJ	Litigation	Partner	22	\$473	\$520	\$625	\$525	\$474	\$513
	Non-Litigation	Partner	25	\$445	\$510	\$625	\$527	\$510	\$511
		Associate	16	\$280	\$333	\$450	\$362	\$392	\$396
Tulsa OK	Litigation	Partner	12	\$242	\$255	\$281	\$263	\$264	\$274
Washington DC	Litigation	Partner	704	\$675	\$805	\$965	\$830	\$803	\$781
		Associate	626	\$425	\$525	\$620	\$526	\$531	\$515
	Non-Litigation	Partner	1403	\$641	\$810	\$982	\$832	\$815	\$778
		Associate	1145	\$400	\$520	\$635	\$544	\$527	\$494

## Section I: High-Level Data Cuts

### Cities

By Years of Experience

2019 -- Real Rates for Partners

Trend Analysis (Mean)

City	Years of Experience	n	First Quartile	Median	Third Quartile	2019	2018	2017
Albany NY	Fewer Than 21 Years	11	\$255	\$265	\$310	\$296	\$288	\$280
	21 or More Years	29	\$268	\$308	\$348	\$332	\$317	\$316
Albuquerque NM	21 or More Years	11	\$219	\$270	\$323	\$280	\$286	\$298
Atlanta GA	Fewer Than 21 Years	105	\$369	\$497	\$650	\$517	\$503	\$484
	21 or More Years	188	\$400	\$585	\$736	\$589	\$573	\$559
Austin TX	Fewer Than 21 Years	27	\$377	\$494	\$720	\$543	\$545	\$485
	21 or More Years	48	\$385	\$460	\$640	\$520	\$522	\$487
Baltimore MD	Fewer Than 21 Years	44	\$441	\$560	\$695	\$569	\$546	\$544
	21 or More Years	89	\$466	\$625	\$755	\$620	\$559	\$543
Baton Rouge LA	21 or More Years	14	\$288	\$336	\$463	\$359	\$366	\$291
Birmingham AL	Fewer Than 21 Years	43	\$306	\$340	\$429	\$362	\$340	\$316
	21 or More Years	53	\$320	\$428	\$485	\$417	\$408	\$388
Boston MA	Fewer Than 21 Years	103	\$445	\$607	\$802	\$622	\$607	\$585
	21 or More Years	203	\$389	\$662	\$842	\$645	\$654	\$659
Bridgeport CT	21 or More Years	21	\$350	\$450	\$507	\$437	\$426	\$429
Buffalo NY	Fewer Than 21 Years	29	\$340	\$340	\$340	\$334	\$317	\$306
	21 or More Years	28	\$340	\$340	\$378	\$360	\$344	\$320
Charleston SC	21 or More Years	12	\$300	\$330	\$500	\$380	\$343	\$334
Charleston WV	21 or More Years	19	\$259	\$283	\$325	\$285	\$279	\$285
Charlotte NC	Fewer Than 21 Years	46	\$413	\$519	\$643	\$551	\$534	\$526
	21 or More Years	54	\$486	\$690	\$891	\$703	\$694	\$616
Chicago IL	Fewer Than 21 Years	283	\$525	\$757	\$935	\$740	\$685	\$651
	21 or More Years	462	\$605	\$785	\$1,003	\$814	\$766	\$722
Cincinnati OH	Fewer Than 21 Years	15	\$338	\$405	\$515	\$427	\$408	\$367
	21 or More Years	42	\$374	\$428	\$530	\$455	\$469	\$444
Cleveland OH	Fewer Than 21 Years	83	\$360	\$395	\$465	\$427	\$429	\$398
	21 or More Years	144	\$395	\$476	\$663	\$543	\$552	\$518
Columbia SC	21 or More Years	21	\$315	\$385	\$450	\$391	\$412	\$377
Columbus OH	Fewer Than 21 Years	15	\$355	\$505	\$560	\$485	\$417	\$394
	21 or More Years	44	\$370	\$455	\$549	\$468	\$474	\$428
Dallas TX	Fewer Than 21 Years	61	\$366	\$465	\$650	\$561	\$578	\$540
	21 or More Years	115	\$424	\$607	\$870	\$661	\$628	\$634
Dayton OH	21 or More Years	12	\$374	\$425	\$491	\$455	\$488	\$477
Denver CO	Fewer Than 21 Years	59	\$381	\$450	\$475	\$451	\$445	\$438
	21 or More Years	93	\$400	\$498	\$601	\$532	\$523	\$476

## Section I: High-Level Data Cuts

### Cities

By Years of Experience

2019 -- Real Rates for Partners

Trend Analysis (Mean)

City	Years of Experience	n	First Quartile	Median	Third Quartile	2019	2018	2017
Detroit MI	Fewer Than 21 Years	32	\$300	\$322	\$395	\$345	\$346	\$329
	21 or More Years	79	\$300	\$365	\$448	\$366	\$352	\$377
Grand Rapids MI	21 or More Years	13	\$350	\$369	\$390	\$374	\$396	\$422
Greenville SC	21 or More Years	16	\$429	\$455	\$495	\$483	\$433	\$412
Hartford CT	Fewer Than 21 Years	17	\$315	\$415	\$465	\$406	\$355	\$373
	21 or More Years	41	\$448	\$502	\$644	\$554	\$502	\$459
Honolulu HI	21 or More Years	21	\$265	\$300	\$425	\$362	\$369	\$338
Houston TX	Fewer Than 21 Years	65	\$478	\$661	\$875	\$695	\$666	\$639
	21 or More Years	88	\$514	\$765	\$940	\$751	\$683	\$655
Indianapolis IN	Fewer Than 21 Years	39	\$295	\$365	\$428	\$365	\$351	\$337
	21 or More Years	57	\$376	\$465	\$560	\$461	\$449	\$413
Jackson MS	Fewer Than 21 Years	22	\$295	\$325	\$356	\$315	\$305	\$282
	21 or More Years	18	\$286	\$350	\$363	\$342	\$366	\$373
Jacksonville FL	21 or More Years	12	\$300	\$400	\$473	\$401	\$358	\$360
Kansas City MO	Fewer Than 21 Years	53	\$325	\$388	\$425	\$376	\$371	\$355
	21 or More Years	77	\$421	\$500	\$598	\$508	\$480	\$442
Las Vegas NV	Fewer Than 21 Years	14	\$313	\$390	\$428	\$383	\$396	\$373
	21 or More Years	22	\$300	\$460	\$675	\$494	\$488	\$445
Little Rock AR	21 or More Years	11	\$218	\$250	\$250	\$249	\$287	\$273
Los Angeles CA	Fewer Than 21 Years	196	\$450	\$647	\$925	\$686	\$665	\$629
	21 or More Years	398	\$500	\$700	\$1,015	\$764	\$734	\$710
Louisville KY	21 or More Years	12	\$355	\$395	\$410	\$389	\$343	\$359
Madison WI	Fewer Than 21 Years	12	\$399	\$420	\$545	\$442	\$446	\$381
Memphis TN	Fewer Than 21 Years	11	\$280	\$290	\$365	\$315	\$300	\$308
	21 or More Years	23	\$300	\$391	\$425	\$366	\$367	\$376
Miami FL	Fewer Than 21 Years	49	\$329	\$474	\$592	\$462	\$418	\$354
	21 or More Years	133	\$350	\$555	\$725	\$543	\$496	\$459
Milwaukee WI	Fewer Than 21 Years	21	\$271	\$332	\$439	\$391	\$383	\$351
	21 or More Years	44	\$358	\$400	\$513	\$448	\$411	\$390
Minneapolis MN	Fewer Than 21 Years	68	\$393	\$502	\$595	\$497	\$436	\$418
	21 or More Years	125	\$388	\$590	\$730	\$578	\$545	\$478
Nashville TN	Fewer Than 21 Years	21	\$356	\$401	\$441	\$387	\$357	\$359
	21 or More Years	46	\$369	\$450	\$500	\$443	\$430	\$428
New Haven CT	21 or More Years	12	\$385	\$458	\$511	\$447	\$382	\$381

## Section I: High-Level Data Cuts

### Cities

By Years of Experience

2019 -- Real Rates for Partners

Trend Analysis (Mean)

City	Years of Experience	n	First Quartile	Median	Third Quartile	2019	2018	2017
New Orleans LA	Fewer Than 21 Years	34	\$305	\$350	\$400	\$362	\$346	\$277
	21 or More Years	48	\$285	\$350	\$460	\$371	\$368	\$305
New York NY	Fewer Than 21 Years	568	\$650	\$975	\$1,249	\$947	\$917	\$874
	21 or More Years	1245	\$603	\$980	\$1,330	\$979	\$948	\$903
Oklahoma City OK	21 or More Years	21	\$223	\$350	\$385	\$347	\$305	\$297
Omaha NE	Fewer Than 21 Years	12	\$270	\$335	\$360	\$327	\$300	\$277
	21 or More Years	26	\$319	\$395	\$410	\$366	\$382	\$358
Orlando FL	Fewer Than 21 Years	28	\$350	\$385	\$525	\$433	\$417	\$440
	21 or More Years	47	\$399	\$450	\$475	\$437	\$457	\$434
Philadelphia PA	Fewer Than 21 Years	210	\$437	\$535	\$655	\$567	\$544	\$516
	21 or More Years	407	\$500	\$675	\$825	\$679	\$643	\$619
Phoenix AZ	Fewer Than 21 Years	23	\$305	\$370	\$425	\$365	\$322	\$320
	21 or More Years	61	\$325	\$413	\$591	\$451	\$432	\$395
Pittsburgh PA	Fewer Than 21 Years	45	\$330	\$448	\$615	\$480	\$418	\$388
	21 or More Years	89	\$410	\$525	\$655	\$544	\$493	\$478
Portland ME	21 or More Years	31	\$211	\$395	\$446	\$369	\$350	\$336
Portland OR	Fewer Than 21 Years	41	\$350	\$400	\$533	\$436	\$401	\$400
	21 or More Years	65	\$400	\$487	\$579	\$487	\$455	\$444
Raleigh NC	Fewer Than 21 Years	19	\$306	\$375	\$467	\$404	\$352	\$358
	21 or More Years	25	\$380	\$455	\$500	\$464	\$449	\$415
Richmond VA	Fewer Than 21 Years	31	\$510	\$582	\$702	\$575	\$557	\$426
	21 or More Years	46	\$515	\$650	\$750	\$625	\$603	\$549
Rochester NY	21 or More Years	16	\$261	\$326	\$360	\$346	\$323	\$314
Sacramento CA	21 or More Years	11	\$325	\$415	\$455	\$473	\$515	\$466
Salt Lake City UT	Fewer Than 21 Years	22	\$272	\$385	\$435	\$386	\$377	\$344
	21 or More Years	29	\$314	\$400	\$430	\$375	\$391	\$377
San Diego CA	Fewer Than 21 Years	34	\$303	\$403	\$915	\$571	\$496	\$466
	21 or More Years	75	\$300	\$445	\$1,002	\$642	\$647	\$588
San Francisco CA	Fewer Than 21 Years	116	\$476	\$675	\$907	\$705	\$688	\$634
	21 or More Years	235	\$525	\$700	\$945	\$741	\$731	\$694
San Jose CA	Fewer Than 21 Years	31	\$553	\$675	\$950	\$776	\$733	\$685
	21 or More Years	92	\$650	\$879	\$1,028	\$875	\$841	\$871
Seattle WA	Fewer Than 21 Years	66	\$393	\$423	\$530	\$452	\$452	\$423
	21 or More Years	136	\$460	\$556	\$655	\$564	\$573	\$525

## Section I: High-Level Data Cuts

### Cities

By Years of Experience

#### 2019 -- Real Rates for Partners

#### Trend Analysis (Mean)

City	Years of Experience	n	First Quartile	Median	Third Quartile	2019	2018	2017
St. Louis MO	Fewer Than 21 Years	54	\$324	\$397	\$460	\$389	\$353	\$314
	21 or More Years	84	\$310	\$425	\$544	\$443	\$403	\$375
Syracuse NY	21 or More Years	15	\$240	\$240	\$308	\$278	\$288	\$294
Tallahassee FL	21 or More Years	13	\$400	\$485	\$576	\$517	\$443	\$419
Tampa FL	Fewer Than 21 Years	32	\$299	\$388	\$461	\$393	\$363	\$358
	21 or More Years	44	\$375	\$464	\$570	\$489	\$431	\$416
Trenton NJ	21 or More Years	21	\$478	\$546	\$638	\$560	\$519	\$517
Washington DC	Fewer Than 21 Years	490	\$605	\$770	\$915	\$763	\$755	\$721
	21 or More Years	915	\$660	\$845	\$1,000	\$860	\$830	\$791



## Section I: High-Level Data Cuts

### Cities

By Years of Experience

#### 2019 -- Real Rates for Associates

#### Trend Analysis (Mean)

City	Years of Experience	n	First Quartile	Median	Third Quartile	2019	2018	2017
Albany NY	7 or More Years	12	\$230	\$235	\$250	\$247	\$240	\$223
Atlanta GA	Fewer Than 3 Years	14	\$289	\$313	\$383	\$330	\$406	
	3 to Fewer Than 7 Years	52	\$271	\$300	\$368	\$330	\$334	\$328
	7 or More Years	103	\$289	\$390	\$556	\$418	\$411	\$358
Austin TX	7 or More Years	26	\$315	\$350	\$510	\$405	\$361	\$354
Baltimore MD	Fewer Than 3 Years	14	\$390	\$390	\$405	\$389	\$390	\$295
	3 to Fewer Than 7 Years	56	\$390	\$423	\$550	\$455	\$437	\$406
	7 or More Years	58	\$278	\$355	\$545	\$425	\$406	\$407
Birmingham AL	3 to Fewer Than 7 Years	22	\$245	\$279	\$312	\$274	\$236	\$225
	7 or More Years	19	\$234	\$284	\$325	\$306	\$269	\$241
Boston MA	Fewer Than 3 Years	16	\$315	\$355	\$432	\$371	\$203	
	3 to Fewer Than 7 Years	46	\$325	\$400	\$450	\$402	\$415	\$371
	7 or More Years	91	\$305	\$425	\$650	\$477	\$517	\$504
Buffalo NY	3 to Fewer Than 7 Years	12	\$197	\$245	\$283	\$241	\$237	\$223
Charlotte NC	3 to Fewer Than 7 Years	21	\$273	\$378	\$450	\$401	\$368	\$319
	7 or More Years	30	\$323	\$389	\$455	\$394	\$374	\$408
Chicago IL	Fewer Than 3 Years	45	\$450	\$526	\$638	\$529	\$531	
	3 to Fewer Than 7 Years	153	\$379	\$495	\$631	\$508	\$474	\$415
	7 or More Years	196	\$387	\$563	\$723	\$566	\$511	\$478
Cincinnati OH	3 to Fewer Than 7 Years	13	\$227	\$240	\$256	\$248	\$245	\$233
	7 or More Years	17	\$266	\$290	\$350	\$307	\$280	\$281
Cleveland OH	Fewer Than 3 Years	25	\$204	\$230	\$284	\$242	\$257	
	3 to Fewer Than 7 Years	54	\$246	\$290	\$360	\$309	\$307	\$272
	7 or More Years	68	\$235	\$295	\$350	\$323	\$317	\$300
Columbus OH	7 or More Years	17	\$245	\$307	\$379	\$316	\$357	\$309
Dallas TX	3 to Fewer Than 7 Years	29	\$330	\$390	\$508	\$443	\$415	\$366
	7 or More Years	77	\$350	\$440	\$633	\$510	\$507	\$508
Denver CO	3 to Fewer Than 7 Years	25	\$250	\$275	\$365	\$314	\$293	\$266
	7 or More Years	49	\$275	\$325	\$365	\$334	\$330	\$307
Detroit MI	3 to Fewer Than 7 Years	15	\$248	\$280	\$296	\$274	\$259	\$234
	7 or More Years	24	\$221	\$275	\$375	\$292	\$252	\$276
Hartford CT	7 or More Years	12	\$285	\$310	\$318	\$302	\$272	\$278
Houston TX	3 to Fewer Than 7 Years	27	\$294	\$389	\$465	\$401	\$351	\$286
	7 or More Years	61	\$303	\$439	\$554	\$452	\$457	\$438

## Section I: High-Level Data Cuts

### Cities

By Years of Experience

2019 -- Real Rates for Associates

Trend Analysis (Mean)

City	Years of Experience	n	First Quartile	Median	Third Quartile	2019	2018	2017
Indianapolis IN	3 to Fewer Than 7 Years	15	\$166	\$225	\$260	\$229	\$199	\$194
	7 or More Years	22	\$165	\$290	\$350	\$274	\$284	\$272
Jackson MS	7 or More Years	19	\$55	\$200	\$251	\$167	\$221	\$182
Kansas City MO	3 to Fewer Than 7 Years	30	\$278	\$305	\$325	\$299	\$265	\$240
	7 or More Years	34	\$269	\$291	\$295	\$288	\$267	\$269
Las Vegas NV	7 or More Years	19	\$250	\$270	\$318	\$281	\$276	\$277
Los Angeles CA	Fewer Than 3 Years	38	\$388	\$468	\$550	\$480	\$475	
	3 to Fewer Than 7 Years	140	\$395	\$562	\$665	\$533	\$486	\$442
	7 or More Years	228	\$330	\$520	\$789	\$569	\$551	\$548
Miami FL	3 to Fewer Than 7 Years	23	\$276	\$327	\$378	\$330	\$312	\$265
	7 or More Years	44	\$238	\$378	\$485	\$369	\$327	\$293
Milwaukee WI	7 or More Years	22	\$245	\$293	\$330	\$302	\$285	\$282
Minneapolis MN	Fewer Than 3 Years	14	\$295	\$340	\$380	\$345	\$361	
	3 to Fewer Than 7 Years	38	\$315	\$375	\$410	\$363	\$339	\$292
	7 or More Years	39	\$309	\$370	\$497	\$392	\$355	\$334
Nashville TN	7 or More Years	19	\$224	\$257	\$306	\$265	\$247	\$255
New Orleans LA	3 to Fewer Than 7 Years	23	\$220	\$253	\$298	\$257	\$232	\$226
	7 or More Years	25	\$225	\$266	\$365	\$288	\$264	\$208
New York NY	Fewer Than 3 Years	140	\$373	\$511	\$623	\$513	\$487	\$411
	3 to Fewer Than 7 Years	329	\$400	\$568	\$838	\$597	\$572	\$527
	7 or More Years	645	\$425	\$721	\$960	\$708	\$685	\$661
Orlando FL	3 to Fewer Than 7 Years	13	\$228	\$246	\$396	\$300	\$284	\$264
	7 or More Years	25	\$280	\$305	\$350	\$324	\$277	\$278
Philadelphia PA	Fewer Than 3 Years	46	\$300	\$325	\$370	\$337	\$308	
	3 to Fewer Than 7 Years	176	\$300	\$350	\$415	\$369	\$355	\$327
	7 or More Years	215	\$318	\$436	\$499	\$442	\$407	\$391
Phoenix AZ	7 or More Years	11	\$195	\$205	\$300	\$256	\$284	\$279
Pittsburgh PA	Fewer Than 3 Years	19	\$243	\$305	\$381	\$306	\$333	
	3 to Fewer Than 7 Years	35	\$253	\$329	\$361	\$321	\$321	\$296
	7 or More Years	49	\$265	\$350	\$417	\$358	\$346	\$318
Portland OR	Fewer Than 3 Years	14	\$240	\$277	\$312	\$268	\$278	
	3 to Fewer Than 7 Years	42	\$283	\$333	\$369	\$329	\$313	\$284
	7 or More Years	63	\$307	\$391	\$440	\$378	\$367	\$331
Richmond VA	7 or More Years	25	\$330	\$412	\$480	\$392	\$354	\$325
Salt Lake City UT	3 to Fewer Than 7 Years	15	\$200	\$210	\$245	\$223	\$193	\$191

## Section I: High-Level Data Cuts

### Cities

By Years of Experience

2019 -- Real Rates for Associates

Trend Analysis (Mean)

City	Years of Experience	n	First Quartile	Median	Third Quartile	2019	2018	2017
San Diego CA	3 to Fewer Than 7 Years	14	\$225	\$290	\$446	\$326	\$325	\$300
	7 or More Years	36	\$280	\$377	\$598	\$425	\$458	\$425
San Francisco CA	Fewer Than 3 Years	12	\$310	\$325	\$359	\$351	\$349	
	3 to Fewer Than 7 Years	49	\$317	\$425	\$550	\$446	\$421	\$394
	7 or More Years	90	\$345	\$440	\$626	\$498	\$503	\$485
San Jose CA	3 to Fewer Than 7 Years	12	\$500	\$550	\$653	\$564	\$454	\$429
	7 or More Years	30	\$412	\$527	\$743	\$604	\$563	\$535
Seattle WA	Fewer Than 3 Years	12	\$257	\$287	\$299	\$282	\$262	
	3 to Fewer Than 7 Years	33	\$275	\$310	\$352	\$313	\$306	\$262
	7 or More Years	42	\$363	\$417	\$470	\$411	\$421	\$344
St. Louis MO	7 or More Years	20	\$190	\$250	\$284	\$248	\$233	\$225
Tampa FL	7 or More Years	11	\$280	\$305	\$324	\$317	\$254	\$257
Washington DC	Fewer Than 3 Years	70	\$350	\$436	\$520	\$442	\$407	\$375
	3 to Fewer Than 7 Years	263	\$405	\$501	\$590	\$506	\$470	\$429
	7 or More Years	356	\$460	\$580	\$721	\$614	\$589	\$565

## Section I: High-Level Data Cuts

### Firm Size

By Matter Type

2019 -- Real Rates for Partners and Associates

Trend Analysis (Mean)

Firm Size	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
50 Lawyers or Fewer	Litigation	Partner	1081	\$245	\$305	\$405	\$348	\$335	\$319
		Associate	886	\$185	\$240	\$300	\$254	\$251	\$229
	Non-Litigation	Partner	1412	\$275	\$375	\$495	\$400	\$392	\$379
		Associate	986	\$210	\$255	\$325	\$281	\$273	\$271
51-200 Lawyers	Litigation	Partner	1099	\$299	\$380	\$510	\$432	\$415	\$404
		Associate	850	\$215	\$260	\$345	\$297	\$283	\$271
	Non-Litigation	Partner	1418	\$356	\$450	\$625	\$507	\$490	\$476
		Associate	939	\$240	\$288	\$375	\$326	\$321	\$308
201-500 Lawyers	Litigation	Partner	1199	\$391	\$500	\$675	\$552	\$539	\$518
		Associate	1063	\$285	\$325	\$420	\$369	\$356	\$348
	Non-Litigation	Partner	1777	\$415	\$532	\$720	\$606	\$607	\$594
		Associate	1478	\$295	\$370	\$509	\$421	\$405	\$397
501-1,000 Lawyers	Litigation	Partner	1507	\$528	\$690	\$935	\$759	\$740	\$712
		Associate	1825	\$350	\$460	\$610	\$499	\$486	\$466
	Non-Litigation	Partner	2751	\$610	\$829	\$1,155	\$894	\$874	\$849
		Associate	3525	\$409	\$549	\$750	\$588	\$584	\$559
More Than 1,000 Lawyers	Litigation	Partner	984	\$680	\$850	\$1,015	\$867	\$823	\$799
		Associate	1157	\$397	\$500	\$681	\$546	\$517	\$494
	Non-Litigation	Partner	2258	\$777	\$940	\$1,175	\$983	\$953	\$902
		Associate	2645	\$451	\$600	\$795	\$638	\$606	\$582

# Section II: Industry Analysis



**2020 Real Rate Report**

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## Section II: Industry Analysis

### Industry Groups

#### 2019 -- Real Rates for Partners, Associates, and Paralegals

#### Trend Analysis (Mean)

Industry Group	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Basic Materials and Utilities	Partner	717	\$353	\$500	\$695	\$573	\$564	\$551
	Associate	556	\$240	\$305	\$423	\$374	\$383	\$382
	Paralegal	378	\$115	\$171	\$225	\$181	\$185	\$173
Consumer Goods	Partner	460	\$330	\$420	\$590	\$476	\$509	\$494
	Associate	313	\$240	\$306	\$400	\$337	\$343	\$334
	Paralegal	195	\$120	\$160	\$210	\$172	\$175	\$161
Consumer Services	Partner	1804	\$425	\$590	\$795	\$657	\$603	\$584
	Associate	1761	\$300	\$404	\$585	\$457	\$433	\$411
	Paralegal	746	\$164	\$225	\$285	\$233	\$212	\$203
Financials Excluding Insurance	Partner	4963	\$464	\$736	\$1,050	\$788	\$788	\$773
	Associate	5195	\$330	\$497	\$720	\$548	\$545	\$540
	Paralegal	2237	\$170	\$230	\$310	\$243	\$241	\$238
Health Care	Partner	1595	\$450	\$675	\$875	\$682	\$647	\$614
	Associate	1703	\$340	\$465	\$580	\$473	\$428	\$402
	Paralegal	926	\$150	\$210	\$284	\$222	\$214	\$194
Industrials	Partner	1820	\$380	\$541	\$832	\$635	\$565	\$535
	Associate	1674	\$284	\$365	\$557	\$439	\$384	\$359
	Paralegal	838	\$150	\$220	\$329	\$237	\$194	\$176
Insurance	Partner	4865	\$170	\$200	\$300	\$289	\$309	\$302
	Associate	4279	\$150	\$175	\$250	\$238	\$245	\$233
	Paralegal	3007	\$85	\$95	\$120	\$115	\$120	\$115
Technology and Telecommunications	Partner	2259	\$475	\$660	\$896	\$710	\$702	\$661
	Associate	2390	\$341	\$448	\$615	\$496	\$483	\$449
	Paralegal	869	\$180	\$235	\$300	\$242	\$237	\$221

## Section II: Industry Analysis

### Industry Groups

By Matter Type

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Industry Group	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Basic Materials and Utilities	Litigation	Partner	398	\$295	\$395	\$575	\$457	\$455	\$422
		Associate	341	\$212	\$260	\$340	\$299	\$298	\$290
	Non-Litigation	Partner	371	\$437	\$595	\$840	\$693	\$674	\$666
		Associate	241	\$300	\$400	\$620	\$482	\$492	\$487
Consumer Goods	Litigation	Partner	241	\$285	\$370	\$430	\$394	\$421	\$415
		Associate	187	\$225	\$270	\$356	\$301	\$305	\$289
	Non-Litigation	Partner	254	\$400	\$502	\$680	\$552	\$589	\$592
		Associate	140	\$289	\$360	\$470	\$382	\$393	\$410
Consumer Services	Litigation	Partner	951	\$391	\$540	\$753	\$604	\$531	\$518
		Associate	864	\$288	\$365	\$511	\$413	\$379	\$371
	Non-Litigation	Partner	1055	\$463	\$617	\$875	\$701	\$666	\$643
		Associate	1031	\$325	\$441	\$612	\$491	\$476	\$447
Financials Excluding Insurance	Litigation	Partner	1467	\$344	\$525	\$778	\$599	\$614	\$621
		Associate	1530	\$265	\$355	\$525	\$413	\$422	\$428
	Non-Litigation	Partner	3845	\$545	\$833	\$1,140	\$866	\$851	\$828
		Associate	3927	\$400	\$570	\$788	\$606	\$594	\$581
Health Care	Litigation	Partner	1050	\$425	\$640	\$862	\$660	\$634	\$588
		Associate	1093	\$325	\$445	\$550	\$455	\$416	\$384
	Non-Litigation	Partner	701	\$494	\$695	\$899	\$717	\$673	\$667
		Associate	722	\$358	\$486	\$620	\$499	\$453	\$444
Industrials	Litigation	Partner	678	\$365	\$500	\$776	\$582	\$509	\$470
		Associate	603	\$275	\$335	\$512	\$402	\$347	\$317
	Non-Litigation	Partner	1359	\$395	\$560	\$867	\$661	\$598	\$584
		Associate	1229	\$288	\$382	\$596	\$457	\$406	\$391
Insurance	Litigation	Partner	644	\$275	\$330	\$464	\$438	\$485	\$444
		Associate	518	\$224	\$276	\$435	\$360	\$358	\$319
	Non-Litigation	Partner	1313	\$275	\$350	\$600	\$496	\$498	\$504
		Associate	1091	\$225	\$275	\$470	\$374	\$358	\$354
Technology and Telecommunications	Litigation	Partner	785	\$476	\$654	\$875	\$697	\$696	\$652
		Associate	793	\$336	\$438	\$615	\$486	\$489	\$449
	Non-Litigation	Partner	1719	\$475	\$670	\$900	\$716	\$705	\$664
		Associate	1801	\$345	\$450	\$614	\$500	\$480	\$450

## Section II: Industry Analysis

### Basic Materials and Utilities

By Practice Area and Matter Type

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Practice Area	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Commercial	Litigation	Partner	15	\$495	\$585	\$770	\$641	\$647	\$599
		Associate	11	\$403	\$425	\$523	\$461	\$415	\$337
	Non-Litigation	Partner	22	\$484	\$593	\$731	\$668	\$641	\$676
		Associate	15	\$375	\$375	\$438	\$422	\$353	\$357
Corporate: Other	Non-Litigation	Associate	33	\$414	\$660	\$860	\$640	\$585	\$505
Corporate: Regulatory and Compliance	Non-Litigation	Partner	41	\$480	\$626	\$905	\$682	\$648	\$704
		Associate	19	\$328	\$430	\$663	\$488	\$462	\$479
Employment and Labor: Discrimination, Retaliation and Harassment / EEO	Litigation	Partner	33	\$320	\$400	\$443	\$388	\$415	\$463
		Associate	29	\$235	\$281	\$300	\$271	\$263	\$248
Employment and Labor: Other	Non-Litigation	Partner	36	\$413	\$452	\$552	\$505	\$447	\$474
		Associate	19	\$249	\$306	\$325	\$298	\$299	\$330
Environmental	Non-Litigation	Partner	43	\$410	\$515	\$708	\$568	\$604	\$494
		Associate	31	\$260	\$383	\$527	\$413	\$456	\$422
Real Estate: Property/Land Acquisition or Divestiture	Non-Litigation	Partner	81	\$585	\$735	\$840	\$778	\$675	\$678



## Section II: Industry Analysis

### Consumer Goods

By Practice Area and Matter Type

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Practice Area	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Commercial	Litigation	Partner	73	\$325	\$388	\$485	\$452	\$451	\$487
		Associate	48	\$303	\$380	\$400	\$383	\$343	\$349
	Non-Litigation	Partner	129	\$400	\$550	\$640	\$556	\$566	\$567
		Associate	73	\$295	\$375	\$470	\$381	\$366	\$380
Corporate: Other	Non-Litigation	Partner	17	\$410	\$465	\$625	\$520	\$656	\$834
Employment and Labor: Other	Litigation	Partner	19	\$370	\$392	\$585	\$477	\$564	\$622
		Associate	18	\$289	\$330	\$399	\$355	\$407	\$410
	Non-Litigation	Partner	35	\$392	\$449	\$553	\$487	\$509	\$578
General Liability: Product and Product Liability	Litigation	Partner	76	\$268	\$305	\$370	\$319	\$326	\$331
		Associate	57	\$215	\$233	\$255	\$234	\$239	\$242

## Section II: Industry Analysis

### Consumer Services

By Practice Area and Matter Type

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Practice Area	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Bankruptcy and Collections	Litigation	Partner	36	\$295	\$395	\$621	\$539	\$414	\$372
		Associate	26	\$260	\$275	\$288	\$307	\$306	\$269
Commercial	Litigation	Partner	291	\$396	\$580	\$770	\$615	\$579	\$575
		Associate	232	\$288	\$352	\$475	\$391	\$396	\$390
	Non-Litigation	Partner	95	\$514	\$620	\$710	\$641	\$562	\$546
		Associate	78	\$332	\$398	\$515	\$448	\$400	\$384
Corporate: Mergers, Acquisitions and Divestitures	Non-Litigation	Partner	108	\$650	\$895	\$1,249	\$919	\$885	\$864
Corporate: Other	Litigation	Partner	185	\$445	\$582	\$788	\$643	\$657	\$621
		Associate	162	\$323	\$410	\$585	\$454	\$463	\$441
	Non-Litigation	Partner	253	\$500	\$684	\$1,223	\$786	\$740	\$718
		Associate	234	\$300	\$470	\$668	\$507	\$484	\$474
Corporate: Regulatory and Compliance	Litigation	Partner	49	\$589	\$740	\$965	\$771	\$639	\$624
		Associate	40	\$350	\$460	\$576	\$468	\$427	\$441
	Non-Litigation	Partner	275	\$485	\$621	\$777	\$662	\$688	\$619
		Associate	204	\$321	\$435	\$612	\$487	\$518	\$451
Employment and Labor: Compensation and Benefits	Non-Litigation	Partner	39	\$515	\$604	\$664	\$624	\$641	\$619
Employment and Labor: Discrimination, Retaliation and Harassment / EEO	Litigation	Partner	80	\$285	\$350	\$446	\$381	\$403	\$385
		Associate	81	\$264	\$292	\$322	\$293	\$289	\$290
Employment and Labor: Other	Litigation	Partner	141	\$340	\$459	\$576	\$481	\$471	\$482
		Associate	95	\$275	\$311	\$375	\$330	\$340	\$335
	Non-Litigation	Partner	86	\$450	\$525	\$685	\$567	\$514	\$529
		Associate	65	\$321	\$413	\$450	\$406	\$400	\$372
Employment and Labor: Union Relations and Negotiations / NLRB	Litigation	Partner	16	\$389	\$487	\$616	\$553	\$587	\$544
	Non-Litigation	Partner	45	\$385	\$450	\$683	\$519	\$489	\$487
		Associate	38	\$325	\$325	\$360	\$362	\$344	\$349
Employment and Labor: Wages, Tips and Overtime	Litigation	Partner	20	\$290	\$339	\$464	\$399	\$409	\$401
		Associate	20	\$260	\$293	\$408	\$329	\$357	\$372

## Section II: Industry Analysis

### Consumer Services

By Practice Area and Matter Type

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Practice Area	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Finance and Securities: Debt/Equity Offerings	Non-Litigation	Partner	18	\$1,049	\$1,160	\$1,249	\$1,107	\$1,086	\$978
Finance and Securities: SEC Filings and Financial Reporting	Non-Litigation	Partner	32	\$658	\$1,096	\$1,249	\$981	\$873	\$884
		Associate	27	\$503	\$612	\$814	\$609	\$541	\$495
Intellectual Property: Other	Non-Litigation	Partner	24	\$478	\$555	\$679	\$565	\$544	\$604
		Associate	31	\$260	\$360	\$389	\$344	\$365	\$377
Intellectual Property: Patents	Non-Litigation	Partner	62	\$385	\$500	\$739	\$608	\$565	\$599
		Associate	102	\$234	\$292	\$403	\$331	\$314	\$364
Intellectual Property: Trademarks	Non-Litigation	Partner	18	\$358	\$550	\$654	\$518	\$627	\$622
		Associate	15	\$259	\$315	\$385	\$330	\$401	\$396
Real Estate: Leasing	Non-Litigation	Partner	33	\$385	\$495	\$647	\$524	\$517	\$503
		Associate	29	\$288	\$350	\$420	\$363	\$332	\$342
Real Estate: Other	Non-Litigation	Partner	58	\$385	\$490	\$600	\$494	\$473	\$496
		Associate	41	\$280	\$344	\$425	\$354	\$311	\$340
Real Estate: Property/Land Acquisition or Divestiture	Non-Litigation	Partner	12	\$413	\$435	\$614	\$488	\$478	\$484

## Section II: Industry Analysis

### Financials Excluding Insurance

By Practice Area and Matter Type

#### 2019 -- Real Rates for Partners and Associates

Practice Area	Matter Type	Role	n	First Quartile	Median	Third Quartile	Trend Analysis (Mean)		
							2019	2018	2017
Bankruptcy and Collections	Litigation	Partner	232	\$300	\$390	\$525	\$458	\$412	\$379
		Associate	231	\$255	\$310	\$410	\$378	\$318	\$264
	Non-Litigation	Partner	273	\$324	\$365	\$450	\$412	\$389	\$376
		Associate	186	\$235	\$290	\$374	\$325	\$294	\$278
Commercial	Litigation	Partner	339	\$365	\$475	\$715	\$591	\$586	\$633
		Associate	297	\$250	\$319	\$441	\$387	\$402	\$424
	Non-Litigation	Partner	265	\$625	\$895	\$1,225	\$959	\$992	\$1,021
		Associate	223	\$410	\$565	\$838	\$673	\$703	\$722
Corporate: Corporate Development	Non-Litigation	Partner	24	\$594	\$810	\$1,575	\$997	\$848	\$558
Corporate: Governance	Non-Litigation	Partner	30	\$620	\$995	\$1,423	\$980	\$995	\$892
		Associate	36	\$446	\$612	\$846	\$658	\$601	\$582
Corporate: Mergers, Acquisitions and Divestitures	Non-Litigation	Partner	111	\$860	\$1,098	\$1,330	\$1,059	\$1,056	\$912
		Associate	112	\$425	\$610	\$862	\$643	\$754	\$717
Corporate: Other	Litigation	Partner	204	\$395	\$575	\$822	\$636	\$741	\$671
		Associate	184	\$295	\$400	\$568	\$448	\$474	\$447
	Non-Litigation	Partner	554	\$657	\$930	\$1,180	\$929	\$882	\$858
		Associate	589	\$439	\$590	\$795	\$620	\$575	\$560
Corporate: Partnerships and Joint Ventures	Non-Litigation	Partner	12	\$870	\$928	\$1,025	\$942	\$876	
Corporate: Regulatory and Compliance	Litigation	Partner	148	\$575	\$790	\$995	\$824	\$852	\$777
		Associate	147	\$405	\$531	\$697	\$555	\$528	\$505
	Non-Litigation	Partner	135	\$899	\$1,061	\$1,300	\$1,092	\$1,007	\$974
		Associate	121	\$440	\$660	\$922	\$701	\$634	\$638
Corporate: Tax	Non-Litigation	Partner	90	\$687	\$995	\$1,395	\$1,053	\$1,042	\$1,039
		Associate	86	\$426	\$585	\$854	\$696	\$681	\$686
Corporate: Treasury	Non-Litigation	Partner	29	\$1,000	\$1,150	\$1,250	\$1,079	\$1,023	\$948
		Associate	30	\$300	\$461	\$715	\$490	\$521	\$537

## Section II: Industry Analysis

### Financials Excluding Insurance

By Practice Area and Matter Type

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Practice Area	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Employment and Labor: Compensation and Benefits	Non-Litigation	Partner	66	\$566	\$643	\$804	\$718	\$681	\$715
		Associate	29	\$347	\$394	\$486	\$420	\$401	\$488
Employment and Labor: Discrimination, Retaliation and Harassment / EEO	Litigation	Partner	37	\$365	\$497	\$707	\$606	\$624	\$525
		Associate	28	\$280	\$357	\$436	\$399	\$484	\$441
	Non-Litigation	Partner	32	\$375	\$453	\$581	\$512	\$480	\$388
		Associate	27	\$295	\$337	\$464	\$383	\$344	\$283
Employment and Labor: ERISA	Non-Litigation	Partner	22	\$711	\$750	\$1,086	\$856	\$745	\$774
Employment and Labor: Other	Litigation	Partner	236	\$598	\$735	\$895	\$770	\$779	\$763
		Associate	241	\$356	\$495	\$625	\$506	\$526	\$519
	Non-Litigation	Partner	216	\$405	\$565	\$758	\$633	\$635	\$588
		Associate	138	\$295	\$385	\$505	\$460	\$450	\$422
Employment and Labor: Wrongful Termination	Litigation	Partner	16	\$551	\$800	\$1,087	\$848	\$761	\$847
		Associate	14	\$345	\$382	\$557	\$440	\$450	\$680
Finance and Securities: Debt/Equity Offerings	Non-Litigation	Partner	143	\$639	\$863	\$1,096	\$906	\$884	\$838
		Associate	137	\$415	\$520	\$680	\$579	\$559	\$546
Finance and Securities: Fiduciary Services	Litigation	Partner	75	\$514	\$675	\$855	\$709	\$712	\$803
		Associate	56	\$296	\$395	\$468	\$391	\$456	\$474
	Non-Litigation	Partner	54	\$455	\$587	\$843	\$665	\$679	\$638
		Associate	24	\$268	\$328	\$482	\$407	\$360	\$402
Finance and Securities: Investments and Other Financial Instruments	Litigation	Partner	68	\$804	\$905	\$1,125	\$943	\$970	\$950
		Associate	91	\$396	\$565	\$648	\$554	\$570	\$590
	Non-Litigation	Partner	1168	\$730	\$928	\$1,195	\$959	\$957	\$954
		Associate	1332	\$466	\$641	\$810	\$652	\$645	\$636
Finance and Securities: Loans and Financing	Litigation	Partner	117	\$334	\$463	\$607	\$539	\$526	\$609
		Associate	160	\$275	\$310	\$397	\$364	\$377	\$345
	Non-Litigation	Partner	1113	\$525	\$795	\$1,170	\$857	\$824	\$802
		Associate	1060	\$405	\$575	\$805	\$603	\$583	\$568

## Section II: Industry Analysis

### Financials Excluding Insurance

By Practice Area and Matter Type

#### 2019 -- Real Rates for Partners and Associates

Practice Area	Matter Type	Role	n	First Quartile	Median	Third Quartile	Trend Analysis (Mean)		
							2019	2018	2017
Finance and Securities: SEC Filings and Financial Reporting	Litigation	Partner	22	\$759	\$975	\$1,045	\$932	\$838	\$875
		Associate	16	\$466	\$608	\$749	\$600	\$522	\$541
	Non-Litigation	Partner	30	\$455	\$560	\$961	\$699	\$713	\$640
Finance and Securities: Securities and Banking Regulations	Litigation	Partner	49	\$602	\$804	\$994	\$817	\$830	\$783
		Associate	59	\$401	\$482	\$637	\$508	\$530	\$489
	Non-Litigation	Partner	56	\$715	\$1,020	\$1,330	\$1,011	\$912	\$938
		Associate	33	\$425	\$565	\$702	\$581	\$556	\$580
General Liability: Consumer Related Claims	Litigation	Partner	14	\$487	\$580	\$730	\$602	\$517	\$442
General Liability: Personal Injury/Wrongful Death	Litigation	Partner	88	\$165	\$185	\$196	\$196	\$182	\$171
		Associate	94	\$150	\$165	\$170	\$166	\$160	\$155
Intellectual Property: Trademarks	Non-Litigation	Partner	13	\$404	\$476	\$598	\$512	\$480	\$503
Miscellaneous: General Advice & Counsel	Non-Litigation	Partner	42	\$550	\$720	\$825	\$700	\$724	\$611
		Associate	15	\$383	\$425	\$520	\$445	\$510	\$469
Real Estate: Other	Litigation	Partner	53	\$400	\$531	\$727	\$562	\$497	\$440
		Associate	45	\$300	\$375	\$560	\$437	\$337	\$282
	Non-Litigation	Partner	30	\$414	\$553	\$886	\$728	\$525	\$479
		Associate	18	\$361	\$574	\$718	\$638	\$421	\$319
Requests for Information: Subpoena	Litigation	Partner	18	\$525	\$595	\$724	\$589	\$766	\$577
		Associate	22	\$346	\$403	\$481	\$424	\$494	\$385

## Section II: Industry Analysis

### Healthcare

By Practice Area and Matter Type

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Practice Area	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Commercial	Litigation	Associate	18	\$238	\$260	\$334	\$294	\$283	\$297
	Non-Litigation	Partner	46	\$558	\$681	\$850	\$698	\$875	\$970
Associate		35	\$333	\$433	\$485	\$432	\$452	\$630	
Corporate: Mergers, Acquisitions and Divestitures	Non-Litigation	Partner	55	\$629	\$915	\$1,322	\$984	\$673	\$822
		Associate	95	\$464	\$725	\$943	\$700	\$658	\$554
Corporate: Other	Litigation	Partner	212	\$625	\$745	\$933	\$798	\$745	\$669
		Associate	215	\$396	\$490	\$585	\$512	\$467	\$428
	Non-Litigation	Partner	216	\$770	\$889	\$935	\$886	\$834	\$781
		Associate	246	\$483	\$525	\$633	\$544	\$534	\$486
Corporate: Regulatory and Compliance	Litigation	Partner	141	\$625	\$790	\$900	\$783	\$750	\$731
		Associate	151	\$383	\$460	\$575	\$489	\$481	\$454
	Non-Litigation	Partner	114	\$413	\$606	\$785	\$616	\$612	\$565
		Associate	106	\$295	\$400	\$525	\$423	\$407	\$377
Employment and Labor: Discrimination, Retaliation and Harassment / EEO	Litigation	Partner	16	\$472	\$540	\$625	\$522	\$482	\$423
Employment and Labor: Other	Litigation	Partner	52	\$422	\$540	\$621	\$509	\$534	\$571
		Associate	28	\$279	\$368	\$425	\$360	\$365	\$376
	Non-Litigation	Partner	52	\$396	\$461	\$664	\$533	\$525	\$523
		Associate	38	\$251	\$288	\$445	\$369	\$423	\$365
Environmental	Litigation	Partner	25	\$385	\$450	\$617	\$480	\$506	\$588
General Liability: Product and Product Liability	Litigation	Partner	236	\$350	\$506	\$708	\$554	\$553	\$491
		Associate	234	\$250	\$350	\$448	\$374	\$352	\$320
Intellectual Property: Patents	Litigation	Partner	201	\$675	\$848	\$976	\$819	\$781	\$746
		Associate	207	\$465	\$535	\$690	\$558	\$504	\$492
	Non-Litigation	Partner	146	\$464	\$625	\$790	\$645	\$661	\$637
		Associate	121	\$345	\$420	\$535	\$455	\$413	\$425
Intellectual Property: Trademarks	Non-Litigation	Partner	34	\$560	\$675	\$878	\$703	\$647	\$675
Requests for Information: Subpoena	Litigation	Partner	16	\$674	\$902	\$915	\$754	\$768	\$748
		Associate	17	\$481	\$500	\$655	\$527	\$466	\$463

## Section II: Industry Analysis

### Industrials

By Practice Area and Matter Type

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Practice Area	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Bankruptcy and Collections	Litigation	Partner	21	\$392	\$475	\$675	\$529	\$480	\$395
Commercial	Litigation	Partner	100	\$448	\$675	\$1,049	\$758	\$565	\$545
		Associate	102	\$303	\$503	\$733	\$561	\$381	\$361
	Non-Litigation	Partner	115	\$410	\$560	\$758	\$631	\$558	\$538
		Associate	74	\$298	\$360	\$465	\$421	\$345	\$373
Corporate: Antitrust and Competition	Litigation	Partner	18	\$447	\$858	\$951	\$730	\$788	\$679
		Associate	17	\$330	\$369	\$540	\$448	\$421	\$484
Corporate: Mergers, Acquisitions and Divestitures	Non-Litigation	Partner	183	\$693	\$927	\$1,200	\$976	\$951	\$866
		Associate	208	\$431	\$660	\$841	\$643	\$574	\$528
Corporate: Other	Litigation	Partner	199	\$452	\$715	\$900	\$704	\$685	\$505
		Associate	153	\$290	\$427	\$625	\$461	\$445	\$329
	Non-Litigation	Partner	516	\$422	\$640	\$920	\$711	\$627	\$621
		Associate	477	\$325	\$447	\$666	\$511	\$437	\$420
Corporate: Regulatory and Compliance	Litigation	Partner	32	\$568	\$797	\$965	\$763	\$755	\$819
		Associate	24	\$449	\$546	\$676	\$543	\$552	\$512
	Non-Litigation	Partner	121	\$442	\$572	\$820	\$627	\$605	\$591
		Associate	78	\$300	\$410	\$608	\$442	\$445	\$390
Corporate: Tax	Non-Litigation	Partner	58	\$590	\$780	\$916	\$751	\$760	\$796
		Associate	54	\$354	\$458	\$554	\$479	\$495	\$502
Employment and Labor: Compensation and Benefits	Non-Litigation	Partner	38	\$496	\$685	\$940	\$741	\$663	\$587
		Associate	14	\$281	\$425	\$512	\$425	\$435	\$351
Employment and Labor: Discrimination, Retaliation and Harassment / EEO	Non-Litigation	Partner	29	\$380	\$420	\$480	\$422	\$402	\$400
		Associate	50	\$295	\$360	\$360	\$330	\$356	\$383
Employment and Labor: Other	Litigation	Partner	22	\$430	\$562	\$590	\$560	\$501	\$416
	Non-Litigation	Partner	85	\$395	\$464	\$592	\$539	\$528	\$507
		Associate	53	\$262	\$316	\$368	\$355	\$363	\$339
Employment and Labor: Union Relations and Negotiations / NLRB	Non-Litigation	Partner	18	\$446	\$493	\$649	\$571	\$513	\$485



## Section II: Industry Analysis

### Industrials

By Practice Area and Matter Type

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Practice Area	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Environmental	Litigation	Partner	25	\$463	\$560	\$605	\$541	\$499	\$483
		Associate	19	\$343	\$365	\$450	\$406	\$327	\$297
	Non-Litigation	Partner	52	\$390	\$525	\$650	\$551	\$521	\$518
General Liability: Other	Non-Litigation	Partner	11	\$675	\$835	\$908	\$822	\$566	\$428
General Liability: Personal Injury/Wrongful Death	Litigation	Partner	38	\$337	\$460	\$624	\$562	\$278	\$304
		Associate	30	\$261	\$325	\$551	\$417	\$211	\$201
General Liability: Product and Product Liability	Litigation	Partner	95	\$200	\$300	\$399	\$346	\$367	\$349
		Associate	75	\$180	\$225	\$298	\$250	\$258	\$272
Intellectual Property: Other	Litigation	Partner	17	\$620	\$670	\$765	\$698	\$695	\$681
		Associate	18	\$302	\$387	\$508	\$417	\$408	\$427
	Non-Litigation	Partner	65	\$400	\$502	\$780	\$632	\$492	\$496
		Associate	54	\$252	\$303	\$533	\$388	\$304	\$299
Intellectual Property: Patents	Litigation	Partner	23	\$650	\$688	\$775	\$699	\$614	\$682
		Associate	18	\$346	\$455	\$549	\$451	\$385	\$411
	Non-Litigation	Partner	123	\$322	\$395	\$500	\$458	\$434	\$449
		Associate	116	\$224	\$275	\$349	\$295	\$322	\$321
Intellectual Property: Trademarks	Non-Litigation	Partner	18	\$316	\$458	\$659	\$483	\$477	\$546
		Associate	11	\$288	\$335	\$385	\$356	\$313	\$332
Real Estate: Other	Non-Litigation	Partner	13	\$368	\$470	\$525	\$449	\$516	\$508

## Section II: Industry Analysis

### Technology and Telecommunications

By Practice Area and Matter Type

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Practice Area	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Bankruptcy and Collections	Litigation	Partner	11	\$455	\$480	\$500	\$486	\$587	\$548
Commercial	Litigation	Partner	106	\$499	\$695	\$937	\$745	\$678	\$613
		Associate	134	\$281	\$420	\$593	\$443	\$423	\$336
	Non-Litigation	Partner	144	\$425	\$597	\$782	\$619	\$643	\$594
		Associate	118	\$356	\$419	\$535	\$462	\$417	\$405
Corporate: Antitrust and Competition	Litigation	Partner	23	\$550	\$689	\$928	\$768	\$801	\$812
		Associate	29	\$450	\$581	\$842	\$623	\$510	\$484
	Non-Litigation	Partner	108	\$832	\$988	\$1,259	\$1,055	\$975	\$920
		Associate	204	\$475	\$610	\$800	\$634	\$565	\$549
Corporate: Governance	Non-Litigation	Partner	64	\$905	\$1,126	\$1,350	\$1,119	\$989	\$952
Corporate: Mergers, Acquisitions and Divestitures	Non-Litigation	Partner	96	\$664	\$873	\$967	\$841	\$829	\$808
		Associate	98	\$410	\$505	\$663	\$531	\$548	\$518
Corporate: Other	Litigation	Partner	177	\$543	\$693	\$871	\$723	\$709	\$706
		Associate	159	\$350	\$435	\$552	\$458	\$457	\$479
	Non-Litigation	Partner	276	\$590	\$800	\$1,000	\$814	\$842	\$754
		Associate	261	\$400	\$510	\$673	\$548	\$554	\$498
Corporate: Regulatory and Compliance	Litigation	Partner	16	\$638	\$682	\$745	\$737	\$826	\$745
		Associate	18	\$366	\$468	\$629	\$504	\$540	\$419
	Non-Litigation	Partner	265	\$525	\$672	\$833	\$688	\$700	\$641
		Associate	252	\$350	\$427	\$581	\$462	\$466	\$435
Corporate: Tax	Non-Litigation	Partner	108	\$672	\$835	\$1,025	\$855	\$790	\$765
Employment and Labor: Agreements	Litigation	Partner	15	\$575	\$725	\$1,065	\$837	\$1,093	\$926
		Associate	16	\$421	\$528	\$783	\$624	\$691	\$631
	Non-Litigation	Partner	34	\$404	\$665	\$797	\$604	\$579	\$586
Employment and Labor: Compensation and Benefits	Non-Litigation	Partner	49	\$569	\$666	\$778	\$704	\$681	\$689
		Associate	33	\$333	\$397	\$530	\$413	\$419	\$381
Employment and Labor: Discrimination, Retaliation and Harassment / EEO	Litigation	Partner	72	\$430	\$478	\$651	\$533	\$513	\$465
		Associate	72	\$310	\$350	\$390	\$351	\$355	\$317
	Non-Litigation	Partner	67	\$428	\$475	\$655	\$528	\$521	\$516
		Associate	66	\$300	\$330	\$390	\$336	\$339	\$325

## Section II: Industry Analysis

### Technology and Telecommunications

By Practice Area and Matter Type

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Practice Area	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Employment and Labor: Other	Litigation	Partner	22	\$482	\$540	\$621	\$560	\$595	\$584
		Associate	15	\$335	\$363	\$388	\$381	\$396	\$356
	Non-Litigation	Partner	192	\$470	\$600	\$711	\$618	\$654	\$629
		Associate	154	\$325	\$390	\$464	\$407	\$430	\$408
General Liability: Consumer Related Claims	Litigation	Partner	33	\$315	\$486	\$743	\$554	\$488	\$508
		Associate	33	\$275	\$383	\$535	\$417	\$369	\$370
Government Relations	Non-Litigation	Partner	51	\$606	\$735	\$883	\$768	\$793	\$708
		Associate	55	\$366	\$476	\$595	\$474	\$506	\$409
Intellectual Property: Other	Non-Litigation	Partner	47	\$438	\$586	\$779	\$607	\$562	\$604
		Associate	36	\$330	\$426	\$520	\$424	\$363	\$325
Intellectual Property: Patents	Litigation	Partner	157	\$573	\$723	\$957	\$760	\$813	\$728
		Associate	165	\$414	\$508	\$730	\$559	\$597	\$495
	Non-Litigation	Partner	214	\$350	\$450	\$722	\$550	\$564	\$497
		Associate	249	\$280	\$333	\$510	\$416	\$408	\$361
Intellectual Property: Trademarks	Litigation	Associate	11	\$358	\$476	\$583	\$479	\$438	\$401
	Non-Litigation	Partner	42	\$485	\$595	\$792	\$653	\$594	\$570
		Associate	49	\$281	\$366	\$408	\$378	\$373	\$366

# Section III: Practice Area Analysis



2020 Real Rate Report

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## Section III: Practice Area Analysis

### Bankruptcy and Collections

By City

## 2019 -- Real Rates for Partners and Associates

## Trend Analysis (Mean)

City	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Albany NY	Partner	13	\$250	\$256	\$311	\$312	\$273	\$271
Atlanta GA	Partner	13	\$360	\$422	\$509	\$477	\$454	\$469
	Associate	24	\$278	\$383	\$532	\$447	\$384	\$397
Baltimore MD	Partner	17	\$351	\$410	\$482	\$431	\$414	\$373
Birmingham AL	Partner	11	\$325	\$325	\$348	\$351	\$289	\$260
Chicago IL	Partner	20	\$303	\$585	\$754	\$582	\$525	\$492
	Associate	21	\$285	\$445	\$545	\$454	\$466	\$367
Cleveland OH	Partner	32	\$355	\$355	\$414	\$382	\$416	\$379
Detroit MI	Partner	15	\$331	\$350	\$350	\$335	\$336	\$317
Hartford CT	Partner	11	\$428	\$488	\$529	\$462	\$412	\$371
Houston TX	Partner	18	\$744	\$763	\$779	\$775	\$666	\$556
	Associate	40	\$350	\$375	\$529	\$436	\$384	\$329
Los Angeles CA	Partner	17	\$323	\$575	\$679	\$551	\$525	\$575
	Associate	21	\$243	\$275	\$305	\$313	\$322	\$325
Miami FL	Partner	17	\$300	\$410	\$657	\$493	\$342	\$378
Minneapolis MN	Associate	13	\$300	\$375	\$450	\$390	\$345	\$250
New York NY	Partner	73	\$358	\$525	\$710	\$584	\$525	\$497
	Associate	82	\$296	\$338	\$488	\$444	\$363	\$337
Philadelphia PA	Partner	66	\$410	\$445	\$534	\$472	\$453	\$433
	Associate	26	\$288	\$328	\$395	\$347	\$317	\$296
Phoenix AZ	Partner	12	\$392	\$490	\$548	\$499	\$455	\$374
Pittsburgh PA	Partner	17	\$342	\$398	\$413	\$391	\$399	\$378
	Associate	22	\$223	\$265	\$335	\$288	\$311	\$276
Portland OR	Partner	11	\$371	\$401	\$414	\$423	\$392	\$385
	Associate	13	\$228	\$237	\$249	\$245	\$215	\$226
Richmond VA	Associate	13	\$382	\$413	\$491	\$409	\$338	\$230
Seattle WA	Associate	16	\$226	\$470	\$649	\$453	\$472	\$251
Washington DC	Partner	19	\$590	\$950	\$1,163	\$888	\$673	\$638
	Associate	13	\$475	\$536	\$635	\$575	\$515	\$480

## Section III: Practice Area Analysis

### Bankruptcy and Collections

By Years of Experience and Matter Type

#### 2019 -- Real Rates for Partners

#### Trend Analysis (Mean)

Years of Experience	Matter Type	n	First Quartile	Median	Third Quartile	2019	2018	2017
Fewer Than 21 Years	Litigation	97	\$325	\$406	\$530	\$471	\$396	\$377
	Non-Litigation	95	\$315	\$361	\$495	\$443	\$405	\$371
21 or More Years	Litigation	218	\$325	\$410	\$540	\$475	\$430	\$396
	Non-Litigation	180	\$350	\$393	\$477	\$440	\$409	\$404

#### 2019 -- Real Rates for Associates

#### Trend Analysis (Mean)

Years of Experience	Matter Type	n	First Quartile	Median	Third Quartile	2019	2018	2017
Fewer Than 3 Years	Litigation	14	\$233	\$255	\$348	\$370	\$225	
	Non-Litigation	23	\$240	\$290	\$335	\$296	\$241	
3 to Fewer Than 7 Years	Litigation	48	\$228	\$280	\$332	\$341	\$273	\$246
	Non-Litigation	48	\$221	\$268	\$315	\$282	\$268	\$255
7 or More Years	Litigation	95	\$265	\$300	\$465	\$376	\$327	\$263
	Non-Litigation	74	\$244	\$290	\$405	\$350	\$317	\$297

## Section III: Practice Area Analysis

### Bankruptcy and Collections

By Firm Size and Matter Type

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Firm Size	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
50 Lawyers or Fewer	Litigation	Partner	90	\$250	\$315	\$385	\$328	\$313	\$300
		Associate	78	\$223	\$250	\$290	\$258	\$252	\$228
	Non-Litigation	Partner	63	\$264	\$295	\$355	\$373	\$298	\$292
		Associate	32	\$210	\$224	\$257	\$241	\$234	\$229
51-200 Lawyers	Litigation	Partner	89	\$310	\$374	\$450	\$388	\$362	\$347
		Associate	37	\$225	\$245	\$275	\$252	\$239	\$250
	Non-Litigation	Partner	74	\$308	\$371	\$436	\$404	\$382	\$361
		Associate	38	\$200	\$230	\$255	\$239	\$227	\$250
201-500 Lawyers	Litigation	Partner	89	\$353	\$425	\$524	\$449	\$449	\$427
		Associate	68	\$275	\$293	\$325	\$305	\$313	\$285
	Non-Litigation	Partner	102	\$355	\$394	\$484	\$429	\$433	\$423
		Associate	81	\$284	\$290	\$340	\$327	\$298	\$286
501-1,000 Lawyers	Litigation	Partner	65	\$465	\$525	\$735	\$659	\$523	\$532
		Associate	104	\$350	\$408	\$565	\$506	\$425	\$385
	Non-Litigation	Partner	37	\$525	\$610	\$779	\$666	\$587	\$606
		Associate	34	\$386	\$450	\$535	\$465	\$409	\$393
More Than 1,000 Lawyers	Litigation	Partner	37	\$599	\$753	\$994	\$786	\$706	\$684
		Associate	36	\$288	\$400	\$500	\$421	\$402	\$307
	Non-Litigation	Partner	25	\$410	\$438	\$438	\$525	\$554	\$589
		Associate	21	\$335	\$386	\$419	\$454	\$413	\$396

## Section III: Practice Area Analysis

### Commercial

By City

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

City	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Atlanta GA	Partner	48	\$577	\$725	\$866	\$731	\$633	\$543
	Associate	49	\$319	\$412	\$512	\$418	\$398	\$369
Austin TX	Partner	20	\$325	\$395	\$495	\$500	\$463	\$447
Baltimore MD	Partner	15	\$520	\$710	\$797	\$666	\$581	\$544
	Associate	18	\$450	\$570	\$630	\$530	\$462	\$423
Birmingham AL	Partner	31	\$328	\$395	\$430	\$386	\$423	\$391
	Associate	16	\$244	\$265	\$295	\$265	\$267	\$233
Boston MA	Partner	29	\$405	\$697	\$805	\$645	\$596	\$573
	Associate	32	\$380	\$450	\$510	\$459	\$420	\$432
Charlotte NC	Partner	20	\$608	\$653	\$882	\$768	\$603	\$632
	Associate	22	\$350	\$379	\$400	\$389	\$360	\$325
Chicago IL	Partner	145	\$555	\$694	\$920	\$733	\$671	\$662
	Associate	145	\$355	\$459	\$597	\$498	\$429	\$416
Cleveland OH	Partner	53	\$365	\$432	\$525	\$477	\$476	\$471
	Associate	60	\$230	\$265	\$345	\$278	\$285	\$258
Dallas TX	Partner	41	\$519	\$641	\$935	\$704	\$650	\$584
	Associate	45	\$363	\$450	\$645	\$490	\$437	\$384
Denver CO	Partner	30	\$400	\$478	\$542	\$507	\$450	\$461
	Associate	20	\$235	\$275	\$380	\$305	\$279	\$288
Detroit MI	Partner	16	\$310	\$395	\$478	\$407	\$388	\$430
	Associate	14	\$215	\$263	\$284	\$263	\$246	\$258
Houston TX	Partner	21	\$540	\$840	\$1,056	\$793	\$618	\$579
	Associate	29	\$370	\$450	\$480	\$455	\$353	\$311
Indianapolis IN	Partner	26	\$361	\$436	\$541	\$445	\$514	\$430
Kansas City MO	Partner	31	\$378	\$453	\$512	\$490	\$483	\$471
	Associate	24	\$290	\$320	\$375	\$330	\$292	\$307
Los Angeles CA	Partner	109	\$529	\$705	\$967	\$763	\$722	\$766
	Associate	145	\$409	\$570	\$751	\$615	\$537	\$536
Miami FL	Partner	33	\$318	\$593	\$691	\$517	\$541	\$465
	Associate	25	\$296	\$371	\$485	\$403	\$377	\$327
Minneapolis MN	Partner	107	\$385	\$552	\$669	\$547	\$531	\$521
	Associate	78	\$320	\$380	\$410	\$382	\$353	\$349
New Orleans LA	Partner	11	\$235	\$323	\$413	\$335	\$328	\$307
New York NY	Partner	244	\$625	\$971	\$1,307	\$1,008	\$916	\$959
	Associate	242	\$405	\$612	\$847	\$672	\$640	\$628



## Section III: Practice Area Analysis

### Commercial

By City

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

City	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Philadelphia PA	Partner	163	\$470	\$617	\$795	\$649	\$613	\$611
	Associate	145	\$288	\$345	\$497	\$413	\$393	\$376
Pittsburgh PA	Partner	20	\$345	\$425	\$610	\$466	\$460	\$457
	Associate	25	\$248	\$288	\$389	\$330	\$315	\$300
Portland OR	Partner	23	\$403	\$503	\$585	\$490	\$467	\$452
	Associate	57	\$300	\$352	\$419	\$358	\$344	\$320
Richmond VA	Associate	14	\$250	\$365	\$461	\$385	\$370	\$383
San Diego CA	Associate	13	\$260	\$290	\$409	\$353	\$367	\$352
San Francisco CA	Partner	47	\$417	\$748	\$925	\$725	\$756	\$738
	Associate	41	\$320	\$399	\$504	\$455	\$503	\$477
San Jose CA	Partner	19	\$810	\$930	\$991	\$951	\$723	\$736
	Associate	11	\$323	\$400	\$602	\$503	\$410	\$454
Seattle WA	Partner	48	\$383	\$450	\$556	\$464	\$521	\$468
	Associate	26	\$277	\$310	\$417	\$350	\$369	\$312
Tampa FL	Associate	11	\$75	\$236	\$358	\$242	\$260	\$279
Washington DC	Partner	268	\$659	\$819	\$999	\$853	\$803	\$787
	Associate	172	\$400	\$506	\$630	\$537	\$516	\$500

## Section III: Practice Area Analysis

### Commercial

By Years of Experience and Matter Type

#### 2019 -- Real Rates for Partners

						Trend Analysis (Mean)		
Years of Experience	Matter Type	n	First Quartile	Median	Third Quartile	2019	2018	2017
Fewer Than 21 Years	Litigation	321	\$365	\$495	\$719	\$573	\$538	\$529
	Non-Litigation	228	\$415	\$590	\$799	\$660	\$643	\$646
21 or More Years	Litigation	551	\$416	\$617	\$880	\$680	\$629	\$636
	Non-Litigation	458	\$530	\$696	\$945	\$780	\$737	\$704

#### 2019 -- Real Rates for Associates

						Trend Analysis (Mean)		
Years of Experience	Matter Type	n	First Quartile	Median	Third Quartile	2019	2018	2017
Fewer Than 3 Years	Litigation	79	\$233	\$295	\$409	\$337	\$295	
	Non-Litigation	42	\$277	\$355	\$462	\$419	\$468	
3 to Fewer Than 7 Years	Litigation	208	\$270	\$353	\$475	\$397	\$368	\$366
	Non-Litigation	109	\$320	\$387	\$511	\$449	\$422	\$424
7 or More Years	Litigation	253	\$270	\$350	\$490	\$405	\$419	\$409
	Non-Litigation	161	\$366	\$451	\$625	\$563	\$504	\$525

## Section III: Practice Area Analysis

### Commercial

By Firm Size and Matter Type

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Firm Size	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
50 Lawyers or Fewer	Litigation	Partner	175	\$275	\$343	\$449	\$377	\$414	\$396
		Associate	123	\$215	\$275	\$313	\$273	\$313	\$278
	Non-Litigation	Partner	88	\$300	\$395	\$483	\$412	\$393	\$390
		Associate	44	\$243	\$305	\$389	\$310	\$264	\$269
51-200 Lawyers	Litigation	Partner	186	\$348	\$407	\$480	\$436	\$439	\$443
		Associate	125	\$230	\$270	\$345	\$290	\$297	\$280
	Non-Litigation	Partner	125	\$380	\$455	\$575	\$504	\$491	\$445
		Associate	75	\$251	\$285	\$396	\$337	\$322	\$283
201-500 Lawyers	Litigation	Partner	234	\$412	\$534	\$697	\$575	\$558	\$533
		Associate	192	\$275	\$348	\$432	\$368	\$357	\$357
	Non-Litigation	Partner	166	\$470	\$590	\$682	\$614	\$645	\$639
		Associate	115	\$318	\$389	\$455	\$416	\$411	\$439
501-1,000 Lawyers	Litigation	Partner	270	\$604	\$747	\$970	\$816	\$748	\$804
		Associate	350	\$325	\$420	\$561	\$469	\$448	\$452
	Non-Litigation	Partner	289	\$625	\$780	\$1,000	\$870	\$824	\$852
		Associate	249	\$381	\$470	\$612	\$539	\$569	\$560
More Than 1,000 Lawyers	Litigation	Partner	178	\$804	\$982	\$1,164	\$985	\$829	\$812
		Associate	193	\$463	\$645	\$785	\$633	\$537	\$505
	Non-Litigation	Partner	193	\$720	\$924	\$1,136	\$964	\$926	\$879
		Associate	191	\$445	\$565	\$790	\$654	\$589	\$565

## Section III: Practice Area Analysis

### Corporate - Mergers, Acquisitions, and Divestitures

By City

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

City	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Atlanta GA	Partner	28	\$561	\$668	\$944	\$745	\$619	\$643
	Associate	32	\$350	\$450	\$535	\$482	\$413	\$459
Baltimore MD	Partner	11	\$745	\$880	\$958	\$869	\$595	\$806
	Associate	11	\$575	\$660	\$683	\$619		\$540
Boston MA	Partner	12	\$719	\$799	\$938	\$886	\$841	\$900
	Associate	22	\$380	\$460	\$521	\$455	\$429	\$472
Chicago IL	Partner	83	\$749	\$908	\$1,045	\$921	\$836	\$835
	Associate	80	\$450	\$602	\$771	\$617	\$528	\$522
Cleveland OH	Partner	13	\$520	\$808	\$926	\$720	\$638	\$597
Houston TX	Partner	11	\$447	\$875	\$1,025	\$758	\$787	\$1,011
Los Angeles CA	Partner	21	\$820	\$920	\$1,150	\$1,006	\$1,041	\$922
	Associate	29	\$468	\$585	\$700	\$641	\$764	\$685
New York NY	Partner	219	\$1,065	\$1,249	\$1,485	\$1,225	\$1,189	\$1,078
	Associate	383	\$550	\$777	\$895	\$730	\$686	\$636
Philadelphia PA	Partner	83	\$525	\$653	\$845	\$701	\$757	\$696
	Associate	77	\$325	\$358	\$450	\$405	\$392	\$365
San Francisco CA	Partner	17	\$820	\$956	\$1,035	\$962	\$981	\$899
San Jose CA	Associate	12	\$528	\$785	\$885	\$722	\$688	\$686
Washington DC	Partner	92	\$799	\$927	\$1,020	\$937	\$906	\$819
	Associate	62	\$414	\$545	\$685	\$580	\$570	\$489

## Section III: Practice Area Analysis

### Corporate - Mergers, Acquisitions, and Divestitures

By Years of Experience and Matter Type

#### 2019 -- Real Rates for Partners

#### Trend Analysis (Mean)

Years of Experience	Matter Type	n	First Quartile	Median	Third Quartile	2019	2018	2017
Fewer Than 21 Years	Litigation	17	\$450	\$555	\$851	\$655	\$397	\$658
	Non-Litigation	177	\$549	\$775	\$1,090	\$821	\$846	\$759
21 or More Years	Litigation	27	\$531	\$585	\$839	\$676	\$556	\$637
	Non-Litigation	343	\$675	\$932	\$1,270	\$973	\$957	\$876

#### 2019 -- Real Rates for Associates

#### Trend Analysis (Mean)

Years of Experience	Matter Type	n	First Quartile	Median	Third Quartile	2019	2018	2017
Fewer Than 3 Years	Non-Litigation	42	\$328	\$403	\$511	\$448	\$507	
3 to Fewer Than 7 Years	Non-Litigation	127	\$366	\$478	\$785	\$547	\$519	\$417
7 or More Years	Litigation	13	\$300	\$375	\$520	\$424	\$351	\$455
	Non-Litigation	128	\$396	\$600	\$862	\$649	\$690	\$609

## Section III: Practice Area Analysis

### Corporate - Mergers, Acquisitions, and Divestitures

By Firm Size and Matter Type

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Firm Size	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
50 Lawyers or Fewer	Non-Litigation	Partner	17	\$425	\$485	\$529	\$486	\$526	\$500
51-200 Lawyers	Litigation	Partner	15	\$395	\$470	\$716	\$580	\$400	\$705
		Associate	15	\$290	\$320	\$460	\$375	\$256	\$275
	Non-Litigation	Partner	57	\$343	\$462	\$621	\$522	\$597	\$566
		Associate	38	\$260	\$320	\$414	\$351	\$339	\$321
201-500 Lawyers	Non-Litigation	Partner	102	\$519	\$597	\$788	\$651	\$699	\$645
		Associate	104	\$303	\$328	\$471	\$394	\$419	\$404
501-1,000 Lawyers	Litigation	Partner	35	\$590	\$750	\$985	\$812	\$591	\$645
		Associate	41	\$370	\$495	\$665	\$531	\$391	\$406
	Non-Litigation	Partner	245	\$778	\$1,090	\$1,329	\$1,064	\$1,009	\$944
		Associate	352	\$481	\$660	\$847	\$668	\$625	\$563
More Than 1,000 Lawyers	Non-Litigation	Partner	237	\$880	\$1,010	\$1,250	\$1,075	\$1,082	\$936
		Associate	266	\$480	\$660	\$885	\$686	\$658	\$586

## Section III: Practice Area Analysis

### Corporate - Regulatory and Compliance

By City

## 2019 -- Real Rates for Partners and Associates

## Trend Analysis (Mean)

City	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Atlanta GA	Partner	30	\$438	\$614	\$696	\$585	\$663	\$662
	Associate	30	\$143	\$289	\$446	\$311	\$486	\$323
Baltimore MD	Partner	32	\$602	\$692	\$801	\$693	\$664	\$615
	Associate	35	\$350	\$395	\$445	\$431	\$469	\$428
Boston MA	Partner	30	\$590	\$703	\$823	\$715	\$711	\$664
	Associate	22	\$331	\$408	\$619	\$449	\$426	\$421
Chicago IL	Partner	99	\$623	\$827	\$950	\$805	\$764	\$766
	Associate	94	\$432	\$560	\$705	\$578	\$527	\$474
Dallas TX	Associate	18	\$335	\$490	\$563	\$473	\$479	\$461
Denver CO	Partner	18	\$433	\$538	\$625	\$536	\$539	\$479
Indianapolis IN	Partner	19	\$361	\$401	\$489	\$436	\$394	\$405
	Associate	11	\$205	\$240	\$381	\$309	\$285	\$213
Kansas City MO	Partner	27	\$411	\$470	\$590	\$512	\$461	\$456
	Associate	14	\$265	\$277	\$313	\$287	\$291	\$319
Los Angeles CA	Partner	73	\$696	\$875	\$1,026	\$857	\$862	\$814
	Associate	105	\$549	\$660	\$785	\$655	\$605	\$570
Miami FL	Partner	20	\$537	\$685	\$881	\$691	\$622	\$563
Minneapolis MN	Partner	26	\$575	\$720	\$760	\$681	\$576	\$518
	Associate	19	\$311	\$418	\$485	\$391	\$394	\$314
New York NY	Partner	185	\$740	\$1,000	\$1,279	\$1,025	\$1,015	\$954
	Associate	197	\$435	\$620	\$847	\$658	\$612	\$596
Philadelphia PA	Partner	92	\$570	\$695	\$803	\$696	\$674	\$699
	Associate	91	\$304	\$383	\$499	\$414	\$370	\$372
Pittsburgh PA	Partner	17	\$605	\$752	\$845	\$685	\$563	\$501
	Associate	24	\$370	\$435	\$511	\$429	\$404	\$325
Portland OR	Partner	22	\$512	\$605	\$627	\$548	\$536	\$494
Richmond VA	Partner	15	\$338	\$391	\$580	\$466	\$457	\$415
	Associate	14	\$374	\$450	\$563	\$464	\$339	\$320
San Francisco CA	Partner	44	\$503	\$720	\$930	\$726	\$748	\$709
	Associate	25	\$359	\$435	\$600	\$483	\$492	\$492
Seattle WA	Partner	40	\$518	\$583	\$695	\$620	\$594	\$541
	Associate	42	\$316	\$416	\$465	\$392	\$359	\$330
Washington DC	Partner	454	\$630	\$805	\$968	\$824	\$814	\$774
	Associate	363	\$394	\$519	\$635	\$533	\$531	\$499

## Section III: Practice Area Analysis

### Corporate - Regulatory and Compliance

By Years of Experience and Matter Type

#### 2019 -- Real Rates for Partners

						Trend Analysis (Mean)		
Years of Experience	Matter Type	n	First Quartile	Median	Third Quartile	2019	2018	2017
Fewer Than 21 Years	Litigation	126	\$553	\$725	\$900	\$736	\$735	\$647
	Non-Litigation	264	\$450	\$647	\$834	\$671	\$687	\$624
21 or More Years	Litigation	234	\$630	\$815	\$1,000	\$840	\$802	\$761
	Non-Litigation	557	\$545	\$683	\$929	\$754	\$731	\$705

#### 2019 -- Real Rates for Associates

						Trend Analysis (Mean)		
Years of Experience	Matter Type	n	First Quartile	Median	Third Quartile	2019	2018	2017
Fewer Than 3 Years	Litigation	24	\$357	\$478	\$606	\$474	\$486	
	Non-Litigation	43	\$288	\$384	\$480	\$404	\$440	
3 to Fewer Than 7 Years	Litigation	87	\$383	\$480	\$596	\$506	\$481	\$419
	Non-Litigation	142	\$352	\$488	\$576	\$490	\$453	\$397
7 or More Years	Litigation	112	\$429	\$543	\$714	\$574	\$556	\$523
	Non-Litigation	205	\$353	\$491	\$689	\$549	\$542	\$510



## Section III: Practice Area Analysis

### Corporate - Regulatory and Compliance

By Firm Size and Matter Type

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Firm Size	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
50 Lawyers or Fewer	Litigation	Partner	26	\$386	\$505	\$711	\$536	\$474	\$448
		Associate	20	\$270	\$318	\$428	\$366	\$337	\$310
	Non-Litigation	Partner	147	\$396	\$523	\$615	\$503	\$480	\$457
		Associate	74	\$277	\$305	\$352	\$337	\$288	\$285
51-200 Lawyers	Litigation	Partner	48	\$371	\$681	\$875	\$659	\$577	\$540
		Associate	27	\$377	\$470	\$587	\$484	\$387	\$356
	Non-Litigation	Partner	127	\$363	\$464	\$597	\$523	\$509	\$492
		Associate	73	\$265	\$309	\$400	\$353	\$325	\$305
201-500 Lawyers	Litigation	Partner	92	\$500	\$637	\$796	\$653	\$631	\$672
		Associate	70	\$345	\$398	\$528	\$439	\$471	\$479
	Non-Litigation	Partner	170	\$485	\$610	\$729	\$635	\$615	\$597
		Associate	116	\$300	\$360	\$454	\$400	\$384	\$370
501-1,000 Lawyers	Litigation	Partner	140	\$659	\$857	\$1,097	\$889	\$904	\$884
		Associate	152	\$414	\$532	\$679	\$558	\$546	\$517
	Non-Litigation	Partner	300	\$646	\$780	\$990	\$861	\$875	\$839
		Associate	333	\$389	\$489	\$620	\$536	\$565	\$540
More Than 1,000 Lawyers	Litigation	Partner	143	\$771	\$875	\$1,059	\$922	\$877	\$810
		Associate	171	\$434	\$528	\$695	\$575	\$536	\$521
	Non-Litigation	Partner	283	\$769	\$893	\$1,021	\$911	\$875	\$866
		Associate	260	\$451	\$595	\$730	\$602	\$549	\$545

## Section III: Practice Area Analysis

### Corporate - Other

By City

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

City	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Atlanta GA	Partner	79	\$398	\$621	\$749	\$633	\$638	\$590
	Associate	59	\$290	\$375	\$537	\$429	\$419	\$364
Austin TX	Partner	21	\$371	\$425	\$495	\$489	\$516	\$440
	Associate	13	\$265	\$350	\$475	\$377	\$336	\$307
Baltimore MD	Partner	25	\$445	\$652	\$748	\$609	\$663	\$652
	Associate	42	\$299	\$383	\$550	\$421	\$446	\$435
Birmingham AL	Partner	19	\$379	\$433	\$485	\$438	\$411	\$390
	Associate	28	\$279	\$325	\$375	\$329	\$253	\$265
Boston MA	Partner	76	\$536	\$676	\$850	\$708	\$670	\$663
	Associate	81	\$345	\$415	\$510	\$435	\$420	\$389
Charlotte NC	Partner	20	\$395	\$494	\$761	\$575	\$682	\$575
	Associate	16	\$281	\$345	\$460	\$383	\$355	\$392
Chicago IL	Partner	254	\$675	\$800	\$983	\$833	\$788	\$730
	Associate	276	\$439	\$540	\$660	\$554	\$506	\$466
Cleveland OH	Partner	37	\$375	\$490	\$815	\$579	\$591	\$549
	Associate	31	\$250	\$330	\$420	\$355	\$337	\$295
Dallas TX	Partner	39	\$408	\$761	\$943	\$709	\$609	\$571
	Associate	63	\$475	\$550	\$645	\$549	\$460	\$404
Denver CO	Partner	14	\$371	\$463	\$546	\$489	\$535	\$488
	Associate	13	\$275	\$295	\$375	\$316	\$354	\$294
Detroit MI	Partner	13	\$320	\$327	\$418	\$357	\$426	\$362
	Associate	12	\$258	\$280	\$306	\$284	\$327	\$252
Hartford CT	Partner	15	\$454	\$488	\$696	\$577	\$504	\$499
Houston TX	Partner	37	\$580	\$761	\$928	\$759	\$628	\$600
	Associate	39	\$368	\$430	\$543	\$465	\$380	\$385
Jackson MS	Partner	14	\$325	\$356	\$433	\$379	\$387	\$392
Kansas City MO	Partner	20	\$418	\$495	\$581	\$504	\$489	\$479
	Associate	19	\$270	\$272	\$295	\$291	\$274	\$259
Los Angeles CA	Partner	215	\$565	\$850	\$1,021	\$823	\$769	\$743
	Associate	187	\$404	\$538	\$697	\$561	\$549	\$541
Miami FL	Partner	42	\$425	\$500	\$625	\$543	\$543	\$502
	Associate	34	\$273	\$385	\$505	\$420	\$393	\$340
Milwaukee WI	Partner	21	\$375	\$481	\$630	\$529	\$408	\$355
	Associate	14	\$238	\$288	\$328	\$301	\$282	\$252
Minneapolis MN	Partner	31	\$384	\$580	\$673	\$559	\$568	\$501
	Associate	24	\$366	\$388	\$466	\$413	\$373	\$301

## Section III: Practice Area Analysis

### Corporate - Other

By City

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

City	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Nashville TN	Partner	11	\$363	\$415	\$477	\$412	\$442	\$425
New Orleans LA	Partner	29	\$313	\$369	\$420	\$370	\$352	\$330
	Associate	19	\$214	\$235	\$290	\$271	\$238	\$244
New York NY	Partner	532	\$720	\$1,114	\$1,347	\$1,030	\$976	\$898
	Associate	724	\$470	\$660	\$847	\$663	\$620	\$590
Orlando FL	Partner	42	\$395	\$450	\$507	\$463	\$490	\$449
	Associate	31	\$213	\$265	\$345	\$270	\$276	\$298
Philadelphia PA	Partner	191	\$550	\$725	\$830	\$717	\$707	\$662
	Associate	198	\$340	\$390	\$480	\$430	\$421	\$390
Phoenix AZ	Partner	23	\$328	\$350	\$417	\$391	\$390	\$398
	Associate	13	\$231	\$275	\$300	\$289	\$310	\$295
Pittsburgh PA	Partner	21	\$373	\$443	\$748	\$534	\$487	\$470
	Associate	26	\$274	\$354	\$438	\$370	\$343	\$305
Portland OR	Associate	17	\$361	\$389	\$434	\$397	\$377	\$303
Raleigh NC	Partner	13	\$425	\$459	\$475	\$452	\$447	\$466
Richmond VA	Partner	15	\$553	\$630	\$711	\$654	\$677	\$643
	Associate	18	\$418	\$459	\$500	\$452	\$413	\$368
San Diego CA	Partner	33	\$295	\$415	\$978	\$594	\$578	\$530
	Associate	25	\$195	\$235	\$377	\$303	\$282	\$280
San Francisco CA	Partner	86	\$514	\$775	\$982	\$764	\$766	\$733
	Associate	58	\$401	\$505	\$668	\$528	\$530	\$481
San Jose CA	Partner	33	\$619	\$723	\$901	\$768	\$818	\$813
	Associate	36	\$350	\$500	\$660	\$521	\$502	\$505
Seattle WA	Partner	51	\$426	\$588	\$737	\$585	\$579	\$529
	Associate	32	\$357	\$409	\$470	\$412	\$415	\$384
St. Louis MO	Partner	19	\$408	\$422	\$512	\$489	\$442	\$416
Tampa FL	Partner	17	\$395	\$420	\$492	\$457	\$482	\$403
Washington DC	Partner	548	\$700	\$844	\$960	\$853	\$814	\$777
	Associate	471	\$466	\$525	\$630	\$553	\$533	\$495

## Section III: Practice Area Analysis

### Corporate - Other

By Years of Experience and Matter Type

#### 2019 -- Real Rates for Partners

						Trend Analysis (Mean)		
Years of Experience	Matter Type	n	First Quartile	Median	Third Quartile	2019	2018	2017
Fewer Than 21 Years	Litigation	294	\$416	\$625	\$780	\$633	\$630	\$533
	Non-Litigation	523	\$494	\$745	\$965	\$753	\$706	\$676
21 or More Years	Litigation	563	\$475	\$675	\$900	\$716	\$694	\$614
	Non-Litigation	1008	\$546	\$803	\$1,045	\$829	\$795	\$760

#### 2019 -- Real Rates for Associates

						Trend Analysis (Mean)		
Years of Experience	Matter Type	n	First Quartile	Median	Third Quartile	2019	2018	2017
Fewer Than 3 Years	Litigation	32	\$274	\$359	\$415	\$360	\$337	
	Non-Litigation	58	\$356	\$430	\$530	\$465	\$447	\$388
3 to Fewer Than 7 Years	Litigation	138	\$293	\$395	\$487	\$416	\$402	\$350
	Non-Litigation	270	\$340	\$466	\$596	\$486	\$452	\$406
7 or More Years	Litigation	208	\$310	\$450	\$613	\$482	\$470	\$428
	Non-Litigation	412	\$383	\$550	\$795	\$596	\$575	\$554

## Section III: Practice Area Analysis

### Corporate - Other

By Firm Size and Matter Type

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Firm Size	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
50 Lawyers or Fewer	Litigation	Partner	120	\$300	\$406	\$500	\$433	\$420	\$346
		Associate	107	\$238	\$300	\$350	\$311	\$321	\$244
	Non-Litigation	Partner	181	\$295	\$390	\$485	\$407	\$411	\$411
		Associate	113	\$215	\$275	\$350	\$300	\$291	\$285
51-200 Lawyers	Litigation	Partner	163	\$369	\$475	\$680	\$538	\$505	\$436
		Associate	108	\$270	\$375	\$451	\$391	\$350	\$298
	Non-Litigation	Partner	209	\$385	\$525	\$765	\$585	\$571	\$559
		Associate	135	\$275	\$341	\$458	\$376	\$366	\$355
201-500 Lawyers	Litigation	Partner	260	\$440	\$575	\$797	\$637	\$592	\$537
		Associate	194	\$298	\$415	\$546	\$436	\$387	\$359
	Non-Litigation	Partner	431	\$451	\$598	\$805	\$659	\$625	\$623
		Associate	315	\$325	\$407	\$560	\$454	\$429	\$413
501-1,000 Lawyers	Litigation	Partner	326	\$585	\$756	\$935	\$800	\$780	\$716
		Associate	380	\$400	\$507	\$618	\$518	\$483	\$457
	Non-Litigation	Partner	540	\$679	\$900	\$1,220	\$933	\$900	\$860
		Associate	692	\$430	\$525	\$738	\$583	\$572	\$543
More Than 1,000 Lawyers	Litigation	Partner	207	\$648	\$775	\$952	\$814	\$823	\$792
		Associate	188	\$383	\$460	\$580	\$495	\$512	\$483
	Non-Litigation	Partner	623	\$811	\$950	\$1,155	\$999	\$954	\$882
		Associate	667	\$488	\$625	\$795	\$643	\$605	\$561

## Section III: Practice Area Analysis

### Employment and Labor

By City

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

City	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Atlanta GA	Partner	102	\$370	\$440	\$583	\$472	\$461	\$460
	Associate	108	\$275	\$290	\$330	\$301	\$322	\$306
Austin TX	Associate	14	\$305	\$327	\$415	\$383	\$330	\$306
Baltimore MD	Partner	22	\$432	\$475	\$664	\$564	\$580	\$538
	Associate	26	\$325	\$400	\$561	\$440	\$464	\$456
Birmingham AL	Partner	15	\$355	\$400	\$443	\$391	\$340	\$322
Boston MA	Partner	45	\$394	\$508	\$690	\$549	\$562	\$529
	Associate	28	\$322	\$370	\$475	\$422	\$445	\$467
Buffalo NY	Partner	19	\$340	\$340	\$340	\$338	\$351	\$334
Chicago IL	Partner	129	\$536	\$625	\$757	\$661	\$665	\$631
	Associate	125	\$311	\$395	\$442	\$403	\$406	\$394
Cincinnati OH	Partner	15	\$347	\$446	\$515	\$438	\$475	\$417
Cleveland OH	Partner	48	\$365	\$409	\$462	\$431	\$463	\$458
	Associate	48	\$270	\$295	\$345	\$300	\$301	\$297
Columbia SC	Partner	13	\$366	\$405	\$470	\$418	\$444	\$399
Dallas TX	Partner	47	\$380	\$485	\$633	\$506	\$508	\$516
	Associate	37	\$295	\$360	\$390	\$370	\$360	\$373
Denver CO	Partner	41	\$450	\$475	\$576	\$514	\$476	\$486
	Associate	29	\$300	\$324	\$335	\$322	\$334	\$320
Detroit MI	Partner	13	\$402	\$428	\$448	\$415	\$405	\$370
Greenville SC	Partner	24	\$383	\$437	\$483	\$454	\$435	\$430
Houston TX	Partner	35	\$445	\$570	\$710	\$595	\$546	\$491
	Associate	17	\$340	\$360	\$424	\$383	\$342	\$331
Indianapolis IN	Partner	15	\$395	\$425	\$469	\$433	\$408	\$374
	Associate	12	\$239	\$295	\$324	\$291	\$285	\$294
Kansas City MO	Partner	17	\$368	\$385	\$444	\$406	\$405	\$360
	Associate	24	\$278	\$295	\$316	\$292	\$282	\$249
Los Angeles CA	Partner	149	\$477	\$610	\$735	\$639	\$601	\$608
	Associate	152	\$325	\$405	\$522	\$451	\$447	\$475
Miami FL	Partner	17	\$458	\$570	\$648	\$557	\$503	\$436
	Associate	14	\$293	\$319	\$325	\$334	\$405	\$329
Minneapolis MN	Partner	32	\$455	\$550	\$655	\$553	\$527	\$473
	Associate	23	\$320	\$374	\$411	\$369	\$324	\$302
Nashville TN	Partner	22	\$360	\$423	\$450	\$410	\$395	\$401
	Associate	19	\$230	\$280	\$288	\$268	\$255	\$258

## Section III: Practice Area Analysis

### Employment and Labor

By City

2019 -- Real Rates for Partners and Associates						Trend Analysis (Mean)		
City	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
New Orleans LA	Partner	12	\$350	\$395	\$459	\$388	\$396	\$380
	Associate	18	\$303	\$329	\$366	\$335	\$307	\$264
New York NY	Partner	349	\$470	\$625	\$815	\$693	\$695	\$688
	Associate	324	\$315	\$395	\$595	\$476	\$493	\$477
Orlando FL	Partner	12	\$474	\$475	\$500	\$475	\$514	\$489
	Associate	15	\$271	\$300	\$335	\$301	\$252	\$294
Philadelphia PA	Partner	119	\$500	\$620	\$775	\$644	\$631	\$639
	Associate	149	\$320	\$380	\$468	\$396	\$385	\$397
Phoenix AZ	Partner	12	\$425	\$470	\$530	\$506	\$501	\$446
Pittsburgh PA	Partner	33	\$475	\$553	\$657	\$566	\$507	\$517
	Associate	39	\$316	\$350	\$360	\$340	\$330	\$317
Portland OR	Partner	13	\$365	\$374	\$405	\$396	\$458	\$452
	Associate	24	\$295	\$315	\$363	\$339	\$337	\$322
Richmond VA	Partner	13	\$491	\$525	\$618	\$575	\$527	\$489
San Diego CA	Partner	23	\$370	\$397	\$529	\$490	\$477	\$459
	Associate	24	\$278	\$295	\$390	\$351	\$328	\$330
San Francisco CA	Partner	88	\$395	\$510	\$639	\$547	\$576	\$550
	Associate	81	\$300	\$345	\$405	\$366	\$353	\$359
San Jose CA	Partner	29	\$553	\$650	\$849	\$701	\$671	\$689
	Associate	16	\$360	\$365	\$425	\$398	\$408	\$393
Seattle WA	Partner	50	\$416	\$498	\$650	\$543	\$525	\$506
	Associate	30	\$325	\$425	\$585	\$442	\$412	\$308
St. Louis MO	Partner	24	\$398	\$465	\$530	\$490	\$466	\$418
Tampa FL	Partner	13	\$305	\$397	\$446	\$442	\$332	\$325
Washington DC	Partner	175	\$580	\$695	\$845	\$729	\$718	\$728
	Associate	125	\$370	\$445	\$595	\$475	\$506	\$508

## Section III: Practice Area Analysis

### Employment and Labor

By Years of Experience and Matter Type

#### 2019 -- Real Rates for Partners

#### Trend Analysis (Mean)

Years of Experience	Matter Type	n	First Quartile	Median	Third Quartile	2019	2018	2017
Fewer Than 21 Years	Litigation	271	\$365	\$440	\$553	\$483	\$484	\$465
	Non-Litigation	355	\$385	\$465	\$601	\$519	\$493	\$488
21 or More Years	Litigation	496	\$430	\$546	\$710	\$599	\$589	\$582
	Non-Litigation	715	\$450	\$565	\$707	\$608	\$600	\$573

#### 2019 -- Real Rates for Associates

#### Trend Analysis (Mean)

Years of Experience	Matter Type	n	First Quartile	Median	Third Quartile	2019	2018	2017
Fewer Than 3 Years	Litigation	29	\$249	\$290	\$312	\$304	\$314	
	Non-Litigation	33	\$272	\$311	\$375	\$327	\$308	
3 to Fewer Than 7 Years	Litigation	156	\$290	\$315	\$373	\$335	\$351	\$334
	Non-Litigation	176	\$285	\$335	\$404	\$365	\$334	\$318
7 or More Years	Litigation	282	\$295	\$363	\$450	\$404	\$415	\$429
	Non-Litigation	331	\$306	\$360	\$430	\$400	\$407	\$391



## Section III: Practice Area Analysis

### Employment and Labor

By Firm Size and Matter Type

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Firm Size	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
50 Lawyers or Fewer	Litigation	Partner	90	\$290	\$366	\$485	\$418	\$383	\$373
		Associate	80	\$214	\$300	\$345	\$302	\$302	\$288
	Non-Litigation	Partner	92	\$350	\$395	\$490	\$426	\$427	\$396
		Associate	51	\$225	\$290	\$340	\$291	\$279	\$250
51-200 Lawyers	Litigation	Partner	93	\$316	\$388	\$475	\$428	\$418	\$439
		Associate	79	\$248	\$300	\$345	\$312	\$297	\$296
	Non-Litigation	Partner	175	\$400	\$460	\$664	\$534	\$508	\$484
		Associate	106	\$243	\$288	\$400	\$332	\$320	\$329
201-500 Lawyers	Litigation	Partner	262	\$370	\$461	\$650	\$523	\$529	\$522
		Associate	248	\$290	\$325	\$400	\$374	\$393	\$397
	Non-Litigation	Partner	257	\$385	\$450	\$550	\$493	\$478	\$461
		Associate	157	\$295	\$320	\$375	\$355	\$330	\$317
501-1,000 Lawyers	Litigation	Partner	342	\$440	\$531	\$680	\$604	\$618	\$588
		Associate	303	\$295	\$348	\$418	\$392	\$425	\$425
	Non-Litigation	Partner	477	\$450	\$536	\$650	\$583	\$593	\$583
		Associate	402	\$303	\$340	\$418	\$382	\$404	\$394
More Than 1,000 Lawyers	Litigation	Partner	147	\$586	\$720	\$853	\$757	\$737	\$745
		Associate	197	\$360	\$435	\$531	\$463	\$463	\$480
	Non-Litigation	Partner	251	\$649	\$725	\$875	\$768	\$769	\$734
		Associate	240	\$354	\$400	\$526	\$459	\$460	\$444

## Section III: Practice Area Analysis

### Environmental

By City

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

City	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Boston MA	Partner	11	\$385	\$590	\$708	\$598	\$438	\$528
New York NY	Partner	24	\$390	\$515	\$605	\$514	\$718	\$570
	Associate	16	\$268	\$343	\$400	\$341	\$517	\$298
Philadelphia PA	Partner	16	\$480	\$550	\$628	\$568	\$494	\$498
Portland OR	Partner	12	\$374	\$458	\$509	\$448	\$377	\$398
Washington DC	Partner	24	\$612	\$788	\$893	\$762	\$797	\$728
	Associate	15	\$365	\$425	\$650	\$498	\$503	\$493

## Section III: Practice Area Analysis

### Environmental

By Years of Experience and Matter Type

#### 2019 -- Real Rates for Partners

#### Trend Analysis (Mean)

Years of Experience	Matter Type	n	First Quartile	Median	Third Quartile	2019	2018	2017
Fewer Than 21 Years	Litigation	16	\$348	\$390	\$569	\$448	\$332	\$369
	Non-Litigation	14	\$350	\$407	\$443	\$411	\$592	\$526
21 or More Years	Litigation	66	\$434	\$542	\$628	\$550	\$455	\$459
	Non-Litigation	87	\$428	\$550	\$720	\$583	\$667	\$598

#### 2019 -- Real Rates for Associates

#### Trend Analysis (Mean)

Years of Experience	Matter Type	n	First Quartile	Median	Third Quartile	2019	2018	2017
3 to Fewer Than 7 Years	Non-Litigation	12	\$250	\$341	\$423	\$346	\$391	\$348
7 or More Years	Litigation	20	\$325	\$360	\$408	\$363	\$246	\$271
	Non-Litigation	15	\$288	\$364	\$465	\$400	\$462	\$430

## Section III: Practice Area Analysis

### Environmental

By Firm Size and Matter Type

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Firm Size	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
50 Lawyers or Fewer	Non-Litigation	Partner	17	\$310	\$375	\$486	\$410	\$439	\$411
51-200 Lawyers	Litigation	Partner	34	\$369	\$473	\$560	\$462	\$442	\$446
	Non-Litigation	Partner	38	\$385	\$410	\$543	\$489	\$470	\$456
		Associate	16	\$240	\$260	\$278	\$286	\$296	\$291
201-500 Lawyers	Litigation	Partner	19	\$457	\$560	\$625	\$542	\$497	\$478
		Associate	12	\$323	\$348	\$400	\$359	\$301	\$296
	Non-Litigation	Partner	30	\$471	\$550	\$611	\$558	\$536	\$535
		Associate	13	\$273	\$325	\$407	\$330	\$298	\$325
501-1,000 Lawyers	Litigation	Partner	25	\$527	\$621	\$774	\$646	\$587	\$542
		Associate	20	\$349	\$425	\$454	\$413	\$393	\$450
	Non-Litigation	Partner	24	\$585	\$650	\$859	\$699	\$657	\$605
		Associate	18	\$364	\$423	\$450	\$419	\$448	\$401

## Section III: Practice Area Analysis

### Finance and Securities

By City

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

City	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Atlanta GA	Partner	53	\$669	\$820	\$949	\$816	\$767	\$695
	Associate	73	\$425	\$503	\$630	\$519	\$473	\$454
Baltimore MD	Partner	53	\$460	\$537	\$765	\$623	\$609	\$586
	Associate	28	\$290	\$344	\$470	\$422	\$403	\$379
Birmingham AL	Partner	12	\$325	\$325	\$470	\$382	\$398	\$423
	Associate	15	\$275	\$290	\$310	\$300	\$308	\$360
Boston MA	Partner	79	\$725	\$891	\$1,068	\$919	\$937	\$965
	Associate	114	\$475	\$603	\$750	\$617	\$592	\$628
Charlotte NC	Partner	48	\$529	\$635	\$835	\$701	\$736	\$691
	Associate	52	\$315	\$410	\$568	\$448	\$473	\$461
Chicago IL	Partner	243	\$740	\$917	\$1,175	\$969	\$950	\$914
	Associate	244	\$438	\$550	\$697	\$582	\$579	\$557
Cleveland OH	Partner	74	\$430	\$455	\$575	\$525	\$553	\$506
	Associate	47	\$227	\$258	\$292	\$273	\$328	\$321
Dallas TX	Partner	67	\$525	\$740	\$1,035	\$797	\$794	\$844
	Associate	102	\$330	\$525	\$730	\$552	\$563	\$548
Denver CO	Partner	21	\$376	\$445	\$633	\$546	\$533	\$572
Detroit MI	Partner	29	\$373	\$413	\$460	\$426	\$404	\$404
	Associate	11	\$215	\$225	\$250	\$251	\$223	\$223
Houston TX	Partner	38	\$768	\$924	\$1,190	\$954	\$970	\$967
	Associate	32	\$350	\$375	\$495	\$449	\$500	\$520
Kansas City MO	Partner	20	\$399	\$450	\$491	\$459	\$450	\$529
	Associate	16	\$279	\$299	\$324	\$306	\$294	\$295
Los Angeles CA	Partner	206	\$818	\$1,029	\$1,265	\$1,030	\$958	\$966
	Associate	376	\$565	\$700	\$880	\$736	\$718	\$707
Miami FL	Partner	37	\$550	\$625	\$785	\$664	\$649	\$646
	Associate	19	\$338	\$372	\$494	\$442	\$389	\$395
Minneapolis MN	Partner	23	\$489	\$598	\$783	\$626	\$581	\$534
	Associate	30	\$450	\$510	\$572	\$515	\$454	\$363
New York NY	Partner	892	\$880	\$1,134	\$1,390	\$1,126	\$1,077	\$1,061
	Associate	1277	\$520	\$681	\$875	\$701	\$678	\$663
Orlando FL	Partner	15	\$580	\$600	\$725	\$633	\$665	\$664
Philadelphia PA	Partner	126	\$633	\$795	\$975	\$814	\$776	\$775
	Associate	95	\$334	\$438	\$561	\$487	\$471	\$461
Phoenix AZ	Partner	14	\$370	\$445	\$587	\$488	\$401	\$385

## Section III: Practice Area Analysis

### Finance and Securities

By City

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

City	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Pittsburgh PA	Partner	50	\$449	\$593	\$780	\$616	\$568	\$562
	Associate	57	\$278	\$395	\$445	\$374	\$390	\$376
Portland OR	Partner	16	\$400	\$440	\$530	\$477	\$386	\$390
Richmond VA	Partner	33	\$695	\$760	\$830	\$755	\$738	\$729
	Associate	31	\$410	\$457	\$480	\$444	\$406	\$400
Salt Lake City UT	Partner	11	\$300	\$400	\$419	\$386	\$448	\$372
San Diego CA	Partner	11	\$553	\$1,045	\$1,110	\$864	\$881	\$848
San Francisco CA	Partner	70	\$721	\$961	\$1,150	\$940	\$910	\$872
	Associate	44	\$565	\$709	\$820	\$676	\$586	\$603
San Jose CA	Partner	19	\$914	\$1,113	\$1,338	\$1,087	\$963	\$1,052
Seattle WA	Partner	22	\$431	\$495	\$671	\$577	\$529	\$531
	Associate	21	\$302	\$405	\$470	\$415	\$411	\$369
Tampa FL	Partner	11	\$453	\$605	\$718	\$565	\$476	\$568
Washington DC	Partner	266	\$750	\$900	\$1,100	\$943	\$941	\$903
	Associate	149	\$460	\$528	\$700	\$591	\$615	\$623

## Section III: Practice Area Analysis

### Finance and Securities

By Years of Experience and Matter Type

#### 2019 -- Real Rates for Partners

#### Trend Analysis (Mean)

Years of Experience	Matter Type	n	First Quartile	Median	Third Quartile	2019	2018	2017
Fewer Than 21 Years	Litigation	72	\$398	\$553	\$751	\$614	\$690	\$714
	Non-Litigation	676	\$545	\$825	\$1,125	\$847	\$810	\$795
21 or More Years	Litigation	168	\$520	\$804	\$1,033	\$795	\$803	\$840
	Non-Litigation	1279	\$620	\$910	\$1,249	\$940	\$932	\$915

#### 2019 -- Real Rates for Associates

#### Trend Analysis (Mean)

Years of Experience	Matter Type	n	First Quartile	Median	Third Quartile	2019	2018	2017
Fewer Than 3 Years	Litigation	11	\$237	\$285	\$389	\$302	\$393	
	Non-Litigation	108	\$295	\$425	\$511	\$418	\$438	\$419
3 to Fewer Than 7 Years	Litigation	39	\$290	\$321	\$422	\$378	\$461	\$406
	Non-Litigation	286	\$327	\$445	\$635	\$500	\$489	\$469
7 or More Years	Litigation	76	\$310	\$470	\$650	\$495	\$525	\$516
	Non-Litigation	469	\$480	\$685	\$950	\$706	\$693	\$684

## Section III: Practice Area Analysis

### Finance and Securities

By Firm Size and Matter Type

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Firm Size	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
50 Lawyers or Fewer	Litigation	Partner	30	\$312	\$333	\$408	\$403	\$419	\$546
		Associate	36	\$265	\$300	\$310	\$283	\$303	\$389
	Non-Litigation	Partner	176	\$330	\$451	\$585	\$488	\$464	\$444
		Associate	77	\$250	\$310	\$375	\$320	\$304	\$298
51-200 Lawyers	Litigation	Partner	49	\$340	\$449	\$747	\$541	\$604	\$594
		Associate	42	\$260	\$395	\$484	\$382	\$431	\$378
	Non-Litigation	Partner	335	\$400	\$478	\$719	\$555	\$538	\$522
		Associate	208	\$245	\$295	\$455	\$350	\$362	\$334
201-500 Lawyers	Litigation	Partner	72	\$429	\$536	\$758	\$612	\$672	\$732
		Associate	88	\$280	\$315	\$412	\$375	\$408	\$417
	Non-Litigation	Partner	372	\$490	\$680	\$1,110	\$790	\$791	\$783
		Associate	368	\$335	\$512	\$721	\$544	\$504	\$500
501-1,000 Lawyers	Litigation	Partner	84	\$673	\$915	\$1,100	\$906	\$918	\$975
		Associate	122	\$379	\$475	\$601	\$507	\$526	\$578
	Non-Litigation	Partner	873	\$790	\$1,010	\$1,275	\$1,038	\$1,011	\$992
		Associate	1118	\$501	\$651	\$835	\$669	\$654	\$633
More Than 1,000 Lawyers	Litigation	Partner	73	\$690	\$960	\$1,117	\$929	\$909	\$926
		Associate	82	\$380	\$460	\$656	\$535	\$563	\$530
	Non-Litigation	Partner	767	\$869	\$1,075	\$1,301	\$1,089	\$1,039	\$1,008
		Associate	904	\$522	\$700	\$905	\$719	\$683	\$670



## Section III: Practice Area Analysis

### General Liability - Litigation Only

By City

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

City	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Atlanta GA	Partner	33	\$210	\$285	\$559	\$401	\$394	\$359
	Associate	31	\$165	\$185	\$330	\$264	\$307	\$248
Baltimore MD	Partner	22	\$506	\$613	\$666	\$586	\$489	\$473
	Associate	46	\$350	\$390	\$510	\$427	\$400	\$380
Birmingham AL	Partner	23	\$220	\$315	\$433	\$329	\$315	\$299
	Associate	12	\$220	\$245	\$271	\$243	\$214	\$194
Boston MA	Partner	25	\$185	\$223	\$413	\$363	\$417	\$333
	Associate	26	\$165	\$180	\$210	\$270	\$259	\$228
Buffalo NY	Partner	12	\$340	\$340	\$380	\$343	\$319	\$300
	Associate	13	\$245	\$255	\$255	\$248	\$248	\$224
Charleston WV	Partner	14	\$201	\$283	\$310	\$268	\$252	\$238
Chicago IL	Partner	48	\$215	\$350	\$785	\$531	\$481	\$445
	Associate	71	\$169	\$220	\$250	\$303	\$307	\$260
Cleveland OH	Partner	12	\$505	\$560	\$678	\$552	\$464	\$375
Dallas TX	Partner	19	\$185	\$210	\$362	\$298	\$309	\$275
	Associate	11	\$160	\$160	\$165	\$228	\$236	\$246
Denver CO	Partner	15	\$335	\$375	\$423	\$372	\$352	\$340
Detroit MI	Partner	17	\$210	\$300	\$319	\$296	\$267	\$307
	Associate	14	\$175	\$215	\$301	\$225	\$211	\$224
Houston TX	Partner	14	\$266	\$320	\$575	\$407	\$410	\$369
	Associate	20	\$283	\$350	\$381	\$333	\$367	\$324
Indianapolis IN	Associate	11	\$150	\$178	\$204	\$193	\$171	\$170
Jackson MS	Partner	41	\$319	\$350	\$370	\$344	\$329	\$317
	Associate	33	\$225	\$240	\$251	\$231	\$232	\$199
Kansas City MO	Partner	35	\$425	\$486	\$575	\$488	\$454	\$380
	Associate	43	\$280	\$315	\$351	\$313	\$293	\$259
Los Angeles CA	Partner	58	\$190	\$431	\$873	\$526	\$555	\$451
	Associate	57	\$179	\$274	\$500	\$375	\$344	\$313
Louisville KY	Associate	13	\$175	\$175	\$220	\$194	\$207	\$191
Miami FL	Partner	24	\$157	\$200	\$333	\$316	\$356	\$238
Milwaukee WI	Partner	12	\$240	\$290	\$383	\$312	\$311	\$293
Minneapolis MN	Partner	17	\$304	\$320	\$385	\$374	\$274	\$259
	Associate	11	\$215	\$295	\$320	\$279	\$233	\$212
Nashville TN	Partner	12	\$269	\$275	\$329	\$316	\$320	\$333

## Section III: Practice Area Analysis

### General Liability - Litigation Only

By City

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

City	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
New Orleans LA	Partner	32	\$275	\$305	\$325	\$300	\$283	\$261
	Associate	35	\$209	\$238	\$238	\$223	\$225	\$207
New York NY	Partner	101	\$225	\$467	\$635	\$484	\$470	\$409
	Associate	97	\$165	\$285	\$418	\$361	\$342	\$272
Orlando FL	Associate	13	\$215	\$220	\$300	\$236	\$185	\$179
Philadelphia PA	Partner	54	\$384	\$479	\$625	\$502	\$445	\$431
	Associate	85	\$307	\$350	\$425	\$365	\$294	\$299
Phoenix AZ	Partner	14	\$150	\$200	\$248	\$247	\$244	\$276
	Associate	11	\$158	\$175	\$230	\$196	\$173	\$235
Portland OR	Associate	11	\$245	\$300	\$352	\$297	\$299	\$257
Richmond VA	Partner	19	\$357	\$532	\$624	\$480	\$323	\$300
	Associate	20	\$200	\$246	\$288	\$258	\$225	\$218
San Diego CA	Partner	13	\$175	\$193	\$256	\$296	\$208	\$203
	Associate	24	\$150	\$169	\$180	\$171	\$164	\$169
San Francisco CA	Partner	16	\$250	\$560	\$600	\$528	\$484	\$413
	Associate	19	\$210	\$245	\$325	\$327	\$255	\$271
Seattle WA	Partner	15	\$281	\$400	\$420	\$369	\$365	\$333
	Associate	12	\$225	\$293	\$366	\$322	\$325	\$246
St. Louis MO	Partner	40	\$250	\$321	\$448	\$357	\$355	\$306
	Associate	26	\$190	\$225	\$250	\$218	\$215	\$199
Washington DC	Partner	71	\$736	\$805	\$935	\$842	\$809	\$768
	Associate	78	\$407	\$490	\$645	\$526	\$527	\$504

## Section III: Practice Area Analysis

### General Liability - Litigation Only

By Years of Experience and Matter Type

#### 2019 -- Real Rates for Partners

						Trend Analysis (Mean)		
Years of Experience	Matter Type	n	First Quartile	Median	Third Quartile	2019	2018	2017
Fewer Than 21 Years	Litigation	284	\$248	\$350	\$538	\$421	\$395	\$346
21 or More Years	Litigation	544	\$250	\$380	\$600	\$454	\$432	\$389

#### 2019 -- Real Rates for Associates

						Trend Analysis (Mean)		
Years of Experience	Matter Type	n	First Quartile	Median	Third Quartile	2019	2018	2017
Fewer Than 3 Years	Litigation	25	\$238	\$325	\$345	\$302	\$317	\$295
3 to Fewer Than 7 Years	Litigation	130	\$200	\$300	\$402	\$321	\$315	\$269
7 or More Years	Litigation	231	\$205	\$275	\$440	\$338	\$308	\$281

## Section III: Practice Area Analysis

### General Liability - Litigation Only

By Firm Size and Matter Type

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Firm Size	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
50 Lawyers or Fewer	Litigation	Partner	287	\$185	\$240	\$305	\$259	\$250	\$247
		Associate	232	\$165	\$185	\$238	\$202	\$196	\$191
51-200 Lawyers	Litigation	Partner	277	\$220	\$300	\$370	\$312	\$308	\$298
		Associate	258	\$175	\$225	\$250	\$221	\$220	\$220
201-500 Lawyers	Litigation	Partner	142	\$300	\$425	\$595	\$461	\$460	\$418
		Associate	132	\$245	\$300	\$329	\$296	\$282	\$268
501-1,000 Lawyers	Litigation	Partner	195	\$490	\$585	\$725	\$630	\$607	\$557
		Associate	195	\$335	\$375	\$490	\$406	\$409	\$375
More Than 1,000 Lawyers	Litigation	Partner	107	\$625	\$803	\$1,015	\$826	\$793	\$736
		Associate	147	\$383	\$500	\$714	\$554	\$464	\$446

## Section III: Practice Area Analysis

### Insurance Defense - Litigation Only

By City

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

City	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Albany NY	Partner	13	\$147	\$150	\$195	\$173	\$182	\$183
Atlanta GA	Partner	35	\$170	\$174	\$230	\$213	\$230	\$235
	Associate	74	\$150	\$155	\$210	\$197	\$201	\$205
Baltimore MD	Partner	39	\$175	\$178	\$195	\$254	\$218	\$201
	Associate	38	\$150	\$155	\$170	\$183	\$192	\$201
Birmingham AL	Partner	44	\$180	\$180	\$323	\$244	\$267	\$266
	Associate	27	\$155	\$175	\$225	\$190	\$200	\$196
Boston MA	Partner	51	\$165	\$184	\$225	\$241	\$252	\$231
	Associate	44	\$155	\$157	\$175	\$211	\$194	\$178
Buffalo NY	Partner	60	\$150	\$155	\$190	\$170	\$167	\$165
	Associate	56	\$133	\$145	\$165	\$147	\$145	\$141
Charleston SC	Partner	21	\$174	\$185	\$215	\$201	\$200	\$201
	Associate	22	\$144	\$145	\$150	\$149	\$152	\$152
Charleston WV	Partner	52	\$160	\$160	\$190	\$185	\$183	\$185
Charlotte NC	Partner	23	\$165	\$175	\$195	\$210	\$229	\$215
	Associate	18	\$146	\$150	\$171	\$171	\$212	\$212
Chicago IL	Partner	204	\$175	\$205	\$275	\$261	\$296	\$284
	Associate	199	\$157	\$175	\$250	\$249	\$247	\$236
Cincinnati OH	Partner	20	\$151	\$160	\$180	\$197	\$193	\$184
	Associate	17	\$134	\$150	\$160	\$158	\$164	\$154
Cleveland OH	Partner	44	\$170	\$180	\$180	\$181	\$174	\$178
	Associate	29	\$155	\$160	\$160	\$157	\$153	\$153
Columbia SC	Partner	36	\$165	\$168	\$175	\$173	\$170	\$164
	Associate	28	\$150	\$150	\$150	\$151	\$150	\$146
Columbus OH	Partner	26	\$170	\$170	\$170	\$179	\$177	\$170
Dallas TX	Partner	35	\$198	\$205	\$265	\$249	\$261	\$271
	Associate	37	\$155	\$165	\$225	\$203	\$196	\$207
Denver CO	Partner	24	\$160	\$160	\$190	\$188	\$193	\$203
	Associate	19	\$140	\$150	\$150	\$168	\$169	\$161
Detroit MI	Partner	80	\$144	\$165	\$180	\$178	\$173	\$174
	Associate	66	\$129	\$144	\$150	\$147	\$148	\$149
Harrisburg PA	Partner	24	\$145	\$165	\$176	\$168	\$161	\$155
Hartford CT	Partner	16	\$210	\$273	\$463	\$328	\$319	\$285
	Associate	18	\$178	\$190	\$283	\$231	\$243	\$208
Houston TX	Partner	28	\$175	\$195	\$325	\$288	\$305	\$273
	Associate	22	\$154	\$260	\$355	\$265	\$217	\$207

## Section III: Practice Area Analysis

### Insurance Defense - Litigation Only

By City

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

City	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Indianapolis IN	Partner	21	\$145	\$169	\$181	\$186	\$186	\$194
	Associate	16	\$135	\$150	\$179	\$157	\$154	\$160
Jackson MS	Partner	14	\$183	\$205	\$283	\$234	\$234	\$229
Jacksonville FL	Partner	19	\$170	\$170	\$190	\$185	\$185	\$187
Kansas City MO	Partner	12	\$168	\$198	\$205	\$201	\$220	\$239
Lafayette LA	Partner	20	\$185	\$200	\$200	\$192	\$199	\$185
Lexington KY	Partner	20	\$154	\$160	\$160	\$161	\$150	\$160
	Associate	27	\$139	\$140	\$140	\$139	\$126	\$128
Los Angeles CA	Partner	134	\$195	\$228	\$275	\$263	\$278	\$254
	Associate	147	\$175	\$185	\$215	\$216	\$220	\$200
Miami FL	Partner	88	\$170	\$190	\$225	\$227	\$219	\$218
	Associate	67	\$160	\$160	\$175	\$170	\$173	\$176
Milwaukee WI	Partner	26	\$167	\$170	\$171	\$178	\$182	\$192
Minneapolis MN	Partner	53	\$160	\$175	\$185	\$199	\$207	\$206
	Associate	54	\$145	\$160	\$190	\$182	\$179	\$178
Nashville TN	Partner	15	\$159	\$165	\$170	\$167	\$160	\$177
	Associate	12	\$150	\$150	\$150	\$148	\$147	\$138
New Orleans LA	Partner	49	\$174	\$175	\$190	\$202	\$206	\$200
	Associate	32	\$150	\$150	\$159	\$157	\$165	\$176
New York NY	Partner	342	\$166	\$185	\$223	\$245	\$269	\$254
	Associate	366	\$145	\$160	\$185	\$190	\$208	\$197
Orlando FL	Partner	27	\$146	\$160	\$170	\$162	\$171	\$175
	Associate	17	\$130	\$150	\$160	\$145	\$154	\$159
Philadelphia PA	Partner	180	\$170	\$180	\$241	\$247	\$267	\$245
	Associate	213	\$150	\$160	\$185	\$200	\$225	\$212
Phoenix AZ	Partner	48	\$170	\$175	\$175	\$186	\$201	\$208
	Associate	38	\$150	\$160	\$173	\$169	\$168	\$172
Pittsburgh PA	Partner	83	\$160	\$165	\$170	\$171	\$176	\$172
	Associate	77	\$145	\$150	\$165	\$156	\$166	\$160
Raleigh NC	Partner	13	\$170	\$185	\$190	\$211	\$212	\$224
	Associate	23	\$150	\$150	\$165	\$171	\$181	\$165
Richmond VA	Partner	21	\$181	\$185	\$185	\$194	\$175	\$199
	Associate	29	\$160	\$165	\$165	\$180	\$159	\$174
San Diego CA	Partner	21	\$190	\$220	\$235	\$242	\$221	\$215
San Francisco CA	Partner	60	\$185	\$260	\$295	\$296	\$300	\$282
	Associate	47	\$175	\$175	\$189	\$194	\$223	\$209

## Section III: Practice Area Analysis

### Insurance Defense - Litigation Only

By City

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

City	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Seattle WA	Partner	16	\$210	\$250	\$350	\$278	\$310	\$294
	Associate	13	\$180	\$225	\$225	\$236	\$256	\$226
St. Louis MO	Partner	29	\$166	\$170	\$200	\$198	\$203	\$209
	Associate	12	\$148	\$163	\$185	\$175	\$196	\$216
Tampa FL	Partner	28	\$169	\$170	\$190	\$191	\$188	\$191
	Associate	20	\$154	\$160	\$160	\$161	\$156	\$156
Washington DC	Partner	73	\$355	\$450	\$826	\$573	\$548	\$533
	Associate	54	\$306	\$400	\$636	\$466	\$375	\$356

## Section III: Practice Area Analysis

### Insurance Defense - Litigation Only

By Years of Experience and Matter Type

#### 2019 -- Real Rates for Partners

#### Trend Analysis (Mean)

Years of Experience	Matter Type	n	First Quartile	Median	Third Quartile	2019	2018	2017
Fewer Than 21 Years	Litigation	664	\$165	\$180	\$210	\$224	\$231	\$226
21 or More Years	Litigation	1409	\$165	\$178	\$220	\$222	\$236	\$229

#### 2019 -- Real Rates for Associates

#### Trend Analysis (Mean)

Years of Experience	Matter Type	n	First Quartile	Median	Third Quartile	2019	2018	2017
Fewer Than 3 Years	Litigation	53	\$160	\$180	\$305	\$253	\$226	
3 to Fewer Than 7 Years	Litigation	254	\$150	\$165	\$215	\$225	\$215	\$189
7 or More Years	Litigation	517	\$150	\$165	\$195	\$204	\$208	\$200



## Section III: Practice Area Analysis

### Insurance Defense - Litigation Only

By Firm Size and Matter Type

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Firm Size	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
50 Lawyers or Fewer	Litigation	Partner	287	\$185	\$240	\$305	\$259	\$250	\$247
		Associate	232	\$165	\$185	\$238	\$202	\$196	\$191
51-200 Lawyers	Litigation	Partner	277	\$220	\$300	\$370	\$312	\$308	\$298
		Associate	258	\$175	\$225	\$250	\$221	\$220	\$220
201-500 Lawyers	Litigation	Partner	142	\$300	\$425	\$595	\$461	\$460	\$418
		Associate	132	\$245	\$300	\$329	\$296	\$282	\$268
501-1,000 Lawyers	Litigation	Partner	195	\$490	\$585	\$725	\$630	\$607	\$557
		Associate	195	\$335	\$375	\$490	\$406	\$409	\$375
More Than 1,000 Lawyers	Litigation	Partner	107	\$625	\$803	\$1,015	\$826	\$793	\$736
		Associate	147	\$383	\$500	\$714	\$554	\$464	\$446

## Section III: Practice Area Analysis

### Intellectual Property - Patents

By City

2019 -- Real Rates for Partners and Associates						Trend Analysis (Mean)		
City	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Atlanta GA	Partner	26	\$487	\$560	\$656	\$563	\$579	\$586
	Associate	24	\$331	\$452	\$536	\$443	\$420	\$404
Austin TX	Partner	26	\$421	\$652	\$769	\$591	\$499	\$485
	Associate	28	\$250	\$432	\$584	\$427	\$302	\$305
Boston MA	Partner	61	\$536	\$658	\$815	\$673	\$663	\$650
	Associate	62	\$382	\$450	\$582	\$481	\$459	\$464
Chicago IL	Partner	67	\$408	\$549	\$788	\$634	\$590	\$585
	Associate	45	\$260	\$348	\$595	\$439	\$376	\$374
Cleveland OH	Partner	17	\$278	\$293	\$925	\$513	\$513	\$495
	Associate	23	\$177	\$228	\$388	\$304	\$326	\$310
Dallas TX	Partner	28	\$475	\$754	\$870	\$679	\$720	\$676
	Associate	30	\$425	\$493	\$631	\$526	\$523	\$464
Denver CO	Partner	13	\$386	\$470	\$510	\$460	\$548	\$509
	Associate	17	\$300	\$300	\$365	\$345	\$404	\$361
Detroit MI	Partner	19	\$310	\$400	\$475	\$408	\$384	\$445
Houston TX	Partner	30	\$313	\$450	\$751	\$543	\$482	\$479
	Associate	58	\$159	\$225	\$281	\$234	\$234	\$243
Kansas City MO	Partner	11	\$289	\$373	\$431	\$372	\$390	\$389
	Associate	22	\$215	\$272	\$358	\$281	\$276	\$261
Los Angeles CA	Partner	39	\$643	\$868	\$1,035	\$850	\$832	\$762
	Associate	91	\$498	\$675	\$753	\$648	\$608	\$540
Minneapolis MN	Partner	25	\$314	\$353	\$421	\$388	\$441	\$483
	Associate	28	\$251	\$300	\$370	\$314	\$432	\$423
New York NY	Partner	93	\$550	\$800	\$979	\$785	\$812	\$717
	Associate	104	\$396	\$493	\$688	\$545	\$544	\$515
Philadelphia PA	Partner	46	\$608	\$690	\$772	\$688	\$670	\$623
	Associate	45	\$300	\$385	\$465	\$402	\$400	\$362
San Diego CA	Partner	11	\$844	\$972	\$986	\$960	\$866	\$713
San Francisco CA	Partner	44	\$725	\$950	\$1,110	\$913	\$904	\$789
	Associate	41	\$450	\$543	\$703	\$574	\$534	\$485
San Jose CA	Partner	20	\$500	\$742	\$988	\$733	\$776	\$615
	Associate	16	\$250	\$300	\$436	\$493	\$453	\$425
Seattle WA	Partner	14	\$442	\$500	\$648	\$550	\$610	\$549
	Associate	15	\$295	\$352	\$395	\$364	\$373	\$390
Washington DC	Partner	194	\$527	\$718	\$930	\$726	\$753	\$729
	Associate	203	\$350	\$471	\$621	\$504	\$484	\$467

## Section III: Practice Area Analysis

### Intellectual Property - Patents

By Years of Experience and Matter Type

#### 2019 -- Real Rates for Partners

						Trend Analysis (Mean)		
Years of Experience	Matter Type	n	First Quartile	Median	Third Quartile	2019	2018	2017
Fewer Than 21 Years	Litigation	179	\$509	\$719	\$935	\$719	\$697	\$642
	Non-Litigation	189	\$369	\$466	\$678	\$537	\$525	\$473
21 or More Years	Litigation	191	\$600	\$811	\$977	\$808	\$808	\$763
	Non-Litigation	209	\$400	\$560	\$750	\$599	\$586	\$566

#### 2019 -- Real Rates for Associates

						Trend Analysis (Mean)		
Years of Experience	Matter Type	n	First Quartile	Median	Third Quartile	2019	2018	2017
Fewer Than 3 Years	Litigation	23	\$383	\$460	\$565	\$471	\$447	
	Non-Litigation	12	\$288	\$320	\$479	\$385	\$322	
3 to Fewer Than 7 Years	Litigation	91	\$327	\$465	\$582	\$477	\$458	\$430
	Non-Litigation	56	\$288	\$325	\$450	\$386	\$384	\$337
7 or More Years	Litigation	94	\$437	\$595	\$745	\$596	\$568	\$538
	Non-Litigation	147	\$300	\$387	\$496	\$445	\$397	\$370

## Section III: Practice Area Analysis

### Intellectual Property - Patents

By Firm Size and Matter Type

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Firm Size	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
50 Lawyers or Fewer	Litigation	Partner	47	\$396	\$531	\$623	\$554	\$517	\$501
		Associate	33	\$301	\$348	\$465	\$366	\$365	\$348
	Non-Litigation	Partner	118	\$300	\$365	\$428	\$394	\$398	\$374
		Associate	140	\$238	\$300	\$325	\$305	\$327	\$322
51-200 Lawyers	Litigation	Partner	93	\$438	\$550	\$743	\$598	\$608	\$651
		Associate	60	\$300	\$363	\$515	\$397	\$383	\$386
	Non-Litigation	Partner	117	\$390	\$464	\$618	\$518	\$493	\$496
		Associate	79	\$275	\$317	\$366	\$335	\$319	\$319
201-500 Lawyers	Litigation	Partner	61	\$543	\$674	\$774	\$683	\$664	\$661
		Associate	60	\$337	\$402	\$530	\$430	\$409	\$433
	Non-Litigation	Partner	104	\$452	\$600	\$714	\$589	\$578	\$558
		Associate	85	\$300	\$375	\$445	\$388	\$378	\$355
501-1,000 Lawyers	Litigation	Partner	127	\$700	\$895	\$1,044	\$888	\$897	\$827
		Associate	170	\$490	\$610	\$740	\$624	\$615	\$561
	Non-Litigation	Partner	118	\$582	\$750	\$1,010	\$790	\$772	\$708
		Associate	150	\$375	\$503	\$646	\$523	\$459	\$450

## Section III: Practice Area Analysis

### Intellectual Property - Trademarks

By City

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

City	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Chicago IL	Partner	23	\$436	\$665	\$777	\$610	\$506	\$583
	Associate	22	\$350	\$385	\$580	\$450	\$442	\$425
New York NY	Partner	31	\$504	\$575	\$695	\$621	\$598	\$633
	Associate	27	\$290	\$350	\$435	\$359	\$342	\$377
Washington DC	Partner	30	\$548	\$695	\$853	\$703	\$653	\$656
	Associate	23	\$385	\$490	\$598	\$496	\$459	\$439

## Section III: Practice Area Analysis

### Intellectual Property - Trademarks

By Years of Experience and Matter Type

#### 2019 -- Real Rates for Partners

#### Trend Analysis (Mean)

Years of Experience	Matter Type	n	First Quartile	Median	Third Quartile	2019	2018	2017
Fewer Than 21 Years	Non-Litigation	37	\$379	\$560	\$803	\$587	\$570	\$609
21 or More Years	Litigation	15	\$512	\$620	\$697	\$624	\$632	\$650
	Non-Litigation	80	\$500	\$598	\$723	\$628	\$594	\$600

#### 2019 -- Real Rates for Associates

#### Trend Analysis (Mean)

Years of Experience	Matter Type	n	First Quartile	Median	Third Quartile	2019	2018	2017
3 to Fewer Than 7 Years	Non-Litigation	16	\$343	\$365	\$474	\$391	\$340	\$370
7 or More Years	Non-Litigation	32	\$339	\$391	\$500	\$440	\$400	\$410

## Section III: Practice Area Analysis

### Intellectual Property - Trademarks

By Firm Size and Matter Type

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Firm Size	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
50 Lawyers or Fewer	Non-Litigation	Partner	36	\$420	\$475	\$570	\$496	\$495	\$491
		Associate	36	\$240	\$303	\$347	\$306	\$305	\$304
51-200 Lawyers	Non-Litigation	Partner	19	\$340	\$408	\$500	\$411	\$401	\$473
201-500 Lawyers	Non-Litigation	Partner	27	\$471	\$565	\$697	\$583	\$584	\$558
		Associate	25	\$322	\$366	\$388	\$359	\$385	\$370
501-1,000 Lawyers	Non-Litigation	Partner	30	\$535	\$665	\$768	\$661	\$669	\$664
		Associate	29	\$367	\$490	\$555	\$465	\$445	\$424
More Than 1,000 Lawyers	Non-Litigation	Partner	36	\$680	\$807	\$935	\$812	\$731	\$754
		Associate	28	\$363	\$520	\$600	\$495	\$512	\$486

## Section III: Practice Area Analysis

### Intellectual Property - Other

By City

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

City	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Chicago IL	Partner	44	\$575	\$780	\$991	\$789	\$653	\$588
	Associate	34	\$356	\$427	\$576	\$471	\$435	\$390
Los Angeles CA	Partner	15	\$556	\$644	\$832	\$700	\$679	\$806
	Associate	18	\$510	\$568	\$768	\$612	\$603	\$523
Minneapolis MN	Partner	13	\$380	\$550	\$595	\$510	\$490	\$670
New York NY	Partner	18	\$643	\$788	\$993	\$841	\$806	\$747
	Associate	49	\$467	\$556	\$720	\$590	\$541	\$556
Philadelphia PA	Associate	19	\$291	\$302	\$367	\$331	\$357	\$359
San Francisco CA	Partner	13	\$720	\$849	\$1,080	\$862	\$896	\$881
Washington DC	Partner	30	\$635	\$780	\$953	\$826	\$730	\$691
	Associate	13	\$495	\$518	\$638	\$545	\$529	\$485



## Section III: Practice Area Analysis

### Intellectual Property - Other

By Years of Experience and Matter Type

#### 2019 -- Real Rates for Partners

#### Trend Analysis (Mean)

Years of Experience	Matter Type	n	First Quartile	Median	Third Quartile	2019	2018	2017
Fewer Than 21 Years	Litigation	16	\$534	\$659	\$835	\$705	\$593	\$470
	Non-Litigation	46	\$426	\$510	\$780	\$619	\$534	\$521
21 or More Years	Litigation	36	\$620	\$758	\$990	\$800	\$681	\$587
	Non-Litigation	89	\$500	\$628	\$803	\$677	\$595	\$628

#### 2019 -- Real Rates for Associates

#### Trend Analysis (Mean)

Years of Experience	Matter Type	n	First Quartile	Median	Third Quartile	2019	2018	2017
3 to Fewer Than 7 Years	Non-Litigation	16	\$282	\$358	\$437	\$403	\$362	\$369
7 or More Years	Litigation	13	\$550	\$684	\$730	\$652	\$592	\$454
	Non-Litigation	35	\$305	\$425	\$529	\$425	\$407	\$370

## Section III: Practice Area Analysis

### Intellectual Property - Other

By Firm Size and Matter Type

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Firm Size	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
50 Lawyers or Fewer	Non-Litigation	Partner	38	\$379	\$475	\$543	\$492	\$423	\$425
		Associate	46	\$236	\$303	\$382	\$329	\$268	\$263
51-200 Lawyers	Non-Litigation	Partner	35	\$419	\$484	\$546	\$506	\$432	\$453
		Associate	23	\$258	\$300	\$360	\$308	\$295	\$277
	Litigation	Associate	16	\$300	\$344	\$406	\$376	\$298	\$341
201-500 Lawyers	Non-Litigation	Partner	29	\$400	\$464	\$570	\$506	\$526	\$554
		Associate	21	\$276	\$335	\$386	\$318	\$323	\$323
501-1,000 Lawyers	Litigation	Partner	30	\$621	\$769	\$986	\$809	\$759	\$648
		Associate	38	\$459	\$561	\$697	\$579	\$584	\$517
	Non-Litigation	Partner	31	\$615	\$689	\$778	\$727	\$678	\$714
		Associate	37	\$363	\$495	\$556	\$502	\$488	\$465
More Than 1,000 Lawyers	Non-Litigation	Partner	38	\$792	\$878	\$1,029	\$922	\$832	\$841
		Associate	37	\$424	\$540	\$649	\$529	\$543	\$555

## Section III: Practice Area Analysis

### Real Estate

By City

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

City	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Atlanta GA	Partner	51	\$250	\$305	\$450	\$384	\$355	\$372
	Associate	40	\$200	\$239	\$285	\$286	\$245	\$237
Baltimore MD	Partner	26	\$275	\$323	\$395	\$384	\$417	\$387
	Associate	37	\$225	\$266	\$288	\$323	\$257	\$330
Birmingham AL	Partner	33	\$290	\$300	\$370	\$332	\$315	\$280
	Associate	37	\$225	\$250	\$275	\$268	\$245	\$217
Boston MA	Partner	40	\$215	\$350	\$440	\$382	\$375	\$405
	Associate	32	\$175	\$225	\$315	\$272	\$330	\$271
Bridgeport CT	Partner	11	\$265	\$350	\$456	\$371	\$347	\$302
Chicago IL	Partner	79	\$251	\$325	\$455	\$441	\$456	\$468
	Associate	65	\$210	\$250	\$300	\$290	\$291	\$304
Cincinnati OH	Partner	17	\$365	\$410	\$435	\$410	\$429	\$463
	Associate	13	\$246	\$253	\$274	\$264	\$254	\$247
Cleveland OH	Partner	40	\$250	\$375	\$475	\$369	\$385	\$381
	Associate	35	\$189	\$233	\$250	\$242	\$247	\$254
Dallas TX	Partner	36	\$295	\$324	\$425	\$377	\$365	\$371
	Associate	26	\$244	\$295	\$420	\$330	\$302	\$272
Denver CO	Partner	46	\$275	\$395	\$503	\$436	\$380	\$377
	Associate	37	\$250	\$275	\$310	\$281	\$259	\$265
Detroit MI	Partner	28	\$200	\$225	\$300	\$265	\$257	\$249
Honolulu HI	Partner	17	\$250	\$275	\$300	\$275	\$289	\$268
Houston TX	Partner	24	\$300	\$425	\$550	\$435	\$402	\$314
	Associate	36	\$295	\$350	\$350	\$328	\$310	\$255
Indianapolis IN	Partner	12	\$235	\$287	\$388	\$299	\$319	\$332
	Associate	21	\$165	\$232	\$260	\$232	\$229	\$217
Jackson MS	Partner	13	\$295	\$300	\$356	\$318	\$309	\$277
Kansas City MO	Partner	22	\$225	\$308	\$343	\$311	\$298	\$299
Las Vegas NV	Partner	13	\$250	\$275	\$360	\$312	\$316	\$332
Little Rock AR	Partner	13	\$215	\$215	\$236	\$226	\$228	\$222
Los Angeles CA	Partner	119	\$310	\$400	\$539	\$459	\$441	\$432
	Associate	116	\$250	\$275	\$370	\$333	\$308	\$336
Memphis TN	Partner	13	\$260	\$285	\$320	\$284	\$263	\$265
Miami FL	Partner	68	\$275	\$375	\$636	\$450	\$403	\$392
	Associate	52	\$210	\$275	\$435	\$316	\$247	\$242
Milwaukee WI	Partner	13	\$283	\$308	\$379	\$350	\$326	\$282

## Section III: Practice Area Analysis

### Real Estate

By City

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

City	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Minneapolis MN	Partner	20	\$235	\$250	\$257	\$279	\$273	\$302
New Orleans LA	Partner	12	\$219	\$275	\$286	\$268	\$281	\$264
	Associate	16	\$199	\$220	\$229	\$218	\$203	\$196
New York NY	Partner	155	\$325	\$424	\$595	\$515	\$494	\$459
	Associate	148	\$250	\$300	\$385	\$348	\$345	\$310
Orlando FL	Partner	22	\$290	\$370	\$430	\$393	\$379	\$364
	Associate	15	\$230	\$230	\$279	\$263	\$251	\$254
Philadelphia PA	Partner	82	\$325	\$400	\$535	\$458	\$458	\$448
	Associate	62	\$275	\$308	\$325	\$320	\$286	\$290
Pittsburgh PA	Partner	15	\$220	\$230	\$288	\$274	\$272	\$270
	Associate	14	\$170	\$175	\$287	\$233	\$221	\$204
Portland OR	Partner	14	\$240	\$295	\$395	\$328	\$287	\$256
San Diego CA	Partner	31	\$213	\$272	\$350	\$371	\$273	\$278
	Associate	28	\$218	\$225	\$250	\$255	\$235	\$262
San Francisco CA	Partner	66	\$325	\$431	\$625	\$491	\$467	\$433
	Associate	39	\$265	\$320	\$525	\$414	\$412	\$361
Seattle WA	Partner	39	\$353	\$450	\$545	\$479	\$507	\$421
	Associate	22	\$250	\$370	\$470	\$367	\$403	\$276
St. Louis MO	Partner	30	\$325	\$340	\$425	\$357	\$329	\$320
Tampa FL	Partner	27	\$288	\$310	\$405	\$355	\$371	\$391
Washington DC	Partner	52	\$325	\$400	\$549	\$492	\$492	\$474
	Associate	32	\$240	\$275	\$360	\$377	\$347	\$310

## Section III: Practice Area Analysis

### Real Estate

By Years of Experience and Matter Type

#### 2019 -- Real Rates for Partners

#### Trend Analysis (Mean)

Years of Experience	Matter Type	n	First Quartile	Median	Third Quartile	2019	2018	2017
Fewer Than 21 Years	Litigation	161	\$236	\$310	\$400	\$350	\$325	\$297
	Non-Litigation	330	\$257	\$319	\$443	\$386	\$354	\$340
21 or More Years	Litigation	339	\$250	\$310	\$403	\$355	\$356	\$352
	Non-Litigation	733	\$285	\$365	\$528	\$432	\$416	\$416

#### 2019 -- Real Rates for Associates

#### Trend Analysis (Mean)

Years of Experience	Matter Type	n	First Quartile	Median	Third Quartile	2019	2018	2017
Fewer Than 3 Years	Litigation	13	\$175	\$210	\$230	\$218	\$205	
	Non-Litigation	25	\$193	\$240	\$300	\$272	\$227	
3 to Fewer Than 7 Years	Litigation	43	\$195	\$230	\$250	\$232	\$239	\$225
	Non-Litigation	111	\$215	\$250	\$300	\$276	\$264	\$264
7 or More Years	Litigation	122	\$195	\$243	\$300	\$276	\$257	\$240
	Non-Litigation	253	\$218	\$265	\$347	\$311	\$299	\$286

## Section III: Practice Area Analysis

### Real Estate

By Firm Size and Matter Type

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Firm Size	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
50 Lawyers or Fewer	Litigation	Partner	279	\$225	\$275	\$340	\$296	\$296	\$279
		Associate	217	\$185	\$225	\$250	\$223	\$221	\$211
	Non-Litigation	Partner	513	\$230	\$286	\$360	\$313	\$309	\$297
		Associate	354	\$185	\$225	\$250	\$230	\$228	\$224
51-200 Lawyers	Litigation	Partner	147	\$220	\$302	\$385	\$341	\$324	\$306
		Associate	94	\$186	\$225	\$271	\$252	\$225	\$219
	Non-Litigation	Partner	271	\$295	\$340	\$445	\$371	\$379	\$373
		Associate	186	\$221	\$250	\$297	\$260	\$260	\$257
201-500 Lawyers	Litigation	Partner	117	\$310	\$400	\$495	\$424	\$412	\$394
		Associate	106	\$245	\$285	\$325	\$294	\$271	\$274
	Non-Litigation	Partner	248	\$306	\$400	\$521	\$436	\$460	\$442
		Associate	193	\$250	\$280	\$325	\$308	\$305	\$296
501-1,000 Lawyers	Litigation	Partner	48	\$393	\$525	\$678	\$539	\$517	\$543
		Associate	48	\$325	\$417	\$500	\$422	\$376	\$322
	Non-Litigation	Partner	148	\$468	\$541	\$746	\$620	\$552	\$552
		Associate	144	\$273	\$350	\$491	\$405	\$373	\$358
More Than 1,000 Lawyers	Litigation	Partner	12	\$555	\$861	\$930	\$780	\$798	\$858
	Non-Litigation	Partner	53	\$677	\$815	\$1,001	\$896	\$785	\$707
		Associate	52	\$398	\$493	\$559	\$519	\$519	\$436

# Section IV: In-Depth Analysis for Select US Cities



**2020 Real Rate Report**

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## Section IV: In-Depth Analysis for Select US Cities

### Boston MA

By Practice Area and Firm Size

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Practice Area	Firm Size	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Commercial	51-200 Lawyers	Associate	13	\$380	\$425	\$510	\$439	\$355	\$406
Corporate: Other	50 Lawyers or Fewer	Partner	12	\$384	\$387	\$451	\$421	\$390	\$389
		Associate	12	\$305	\$353	\$382	\$343	\$340	\$310
	51-200 Lawyers	Partner	24	\$585	\$688	\$900	\$750	\$694	\$702
		Associate	28	\$340	\$415	\$510	\$424	\$379	\$362
	201-500 Lawyers	Partner	13	\$553	\$670	\$784	\$661	\$591	\$599
		Associate	15	\$407	\$511	\$602	\$498	\$455	\$431
	More Than 1,000 Lawyers	Partner	23	\$701	\$823	\$943	\$840	\$881	\$891
		Associate	22	\$376	\$411	\$499	\$440	\$523	\$477
Employment and Labor: Other	501-1,000 Lawyers	Partner	12	\$465	\$528	\$586	\$534	\$480	\$568
Finance and Securities: Investments and Other Financial Instruments	501-1,000 Lawyers	Partner	16	\$768	\$879	\$1,055	\$923	\$848	\$934
		Associate	13	\$480	\$663	\$760	\$634	\$645	\$601
	More Than 1,000 Lawyers	Partner	33	\$891	\$990	\$1,134	\$1,026	\$1,049	\$1,108
Intellectual Property: Patents	51-200 Lawyers	Partner	21	\$669	\$815	\$856	\$792	\$738	\$746
		Associate	14	\$370	\$465	\$560	\$463	\$427	\$472
	201-500 Lawyers	Partner	23	\$608	\$658	\$714	\$662	\$682	\$650



## Section IV: In-Depth Analysis for Select US Cities

### Chicago IL

By Practice Area and Firm Size

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Practice Area	Firm Size	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Commercial	50 Lawyers or Fewer	Partner	20	\$273	\$398	\$538	\$406	\$426	\$447
	51-200 Lawyers	Associate	11	\$247	\$266	\$266	\$275	\$264	\$278
		Partner	30	\$540	\$654	\$919	\$708	\$677	\$641
	201-500 Lawyers	Associate	24	\$432	\$455	\$568	\$507	\$455	\$427
		Partner	22	\$601	\$694	\$843	\$755	\$707	\$692
	501-1,000 Lawyers	Associate	39	\$415	\$450	\$550	\$475	\$465	\$443
		Partner	63	\$718	\$902	\$1,075	\$914	\$886	\$872
More Than 1,000 Lawyers	Associate	60	\$449	\$590	\$774	\$610	\$538	\$528	
	Partner	12	\$663	\$705	\$745	\$715	\$696	\$830	
Corporate: Mergers, Acquisitions and Divestitures	501-1,000 Lawyers	Partner	46	\$895	\$978	\$1,146	\$1,031	\$899	\$864
	More Than 1,000 Lawyers	Associate	51	\$496	\$659	\$853	\$672	\$528	\$538
Corporate: Other	51-200 Lawyers	Partner	13	\$490	\$575	\$640	\$576	\$569	\$490
		Associate	101	\$449	\$545	\$660	\$548	\$520	\$490
	201-500 Lawyers	Partner	74	\$723	\$794	\$951	\$814	\$760	\$732
		Associate	20	\$610	\$665	\$737	\$718	\$691	\$631
	501-1,000 Lawyers	Associate	23	\$373	\$393	\$481	\$466	\$424	\$412
		Partner	136	\$710	\$920	\$1,050	\$912	\$869	\$803
	More Than 1,000 Lawyers	Associate	139	\$475	\$555	\$705	\$591	\$530	\$490
Corporate: Regulatory and Compliance	201-500 Lawyers	Partner	23	\$603	\$786	\$868	\$750	\$686	\$829
		Associate	19	\$429	\$525	\$674	\$522	\$543	\$511
	501-1,000 Lawyers	Partner	12	\$608	\$790	\$880	\$758	\$657	\$739
		Associate	11	\$415	\$450	\$680	\$492	\$482	\$480
	More Than 1,000 Lawyers	Partner	58	\$734	\$866	\$985	\$882	\$883	\$850
		Associate	58	\$495	\$620	\$765	\$647	\$582	\$513
Corporate: Tax	More Than 1,000 Lawyers	Partner	49	\$800	\$935	\$1,050	\$947	\$836	\$850
		Associate	59	\$535	\$635	\$730	\$613	\$516	\$532
Employment and Labor: Compensation and Benefits	More Than 1,000 Lawyers	Partner	11	\$731	\$918	\$985	\$850	\$868	\$780

## Section IV: In-Depth Analysis for Select US Cities

### Chicago IL

By Practice Area and Firm Size

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Practice Area	Firm Size	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Employment and Labor: Discrimination, Retaliation and Harassment / EEO	501-1,000 Lawyers	Associate	14	\$313	\$350	\$395	\$358	\$357	\$349
Employment and Labor: Other	501-1,000 Lawyers	Partner	26	\$540	\$554	\$665	\$578	\$568	\$582
		Associate	38	\$349	\$395	\$450	\$403	\$373	\$384
	More Than 1,000 Lawyers	Partner	21	\$604	\$786	\$973	\$809	\$891	\$815
		Associate	22	\$339	\$488	\$693	\$527	\$505	\$452
Finance and Securities: Debt/Equity Offerings	More Than 1,000 Lawyers	Partner	11	\$602	\$799	\$1,090	\$879	\$1,034	\$824
		Associate	11	\$409	\$450	\$736	\$575	\$527	\$447
Finance and Securities: Investments and Other Financial Instruments	501-1,000 Lawyers	Partner	27	\$730	\$810	\$870	\$806	\$788	\$794
		Associate	50	\$426	\$518	\$570	\$514	\$483	\$462
	More Than 1,000 Lawyers	Partner	80	\$816	\$990	\$1,203	\$1,041	\$1,025	\$1,039
		Associate	71	\$520	\$625	\$805	\$662	\$647	\$649
Finance and Securities: Loans and Financing	501-1,000 Lawyers	Partner	18	\$774	\$829	\$945	\$913	\$721	\$817
		Associate	27	\$513	\$594	\$690	\$601	\$523	\$526
	More Than 1,000 Lawyers	Partner	72	\$1,087	\$1,175	\$1,357	\$1,171	\$1,098	\$1,052
		Associate	47	\$500	\$635	\$792	\$633	\$665	\$658
Insurance Defense: Other	50 Lawyers or Fewer	Partner	37	\$220	\$315	\$315	\$275	\$274	\$270
	51-200 Lawyers	Partner	12	\$205	\$240	\$245	\$230	\$236	\$216
Insurance Defense: Personal Injury/Wrongful Death	50 Lawyers or Fewer	Partner	11	\$175	\$220	\$253	\$214	\$205	\$191
Insurance Defense: Property Damage	50 Lawyers or Fewer	Partner	28	\$190	\$300	\$315	\$268	\$256	\$263
		Associate	34	\$180	\$225	\$250	\$217	\$216	\$223

## Section IV: In-Depth Analysis for Select US Cities

### Chicago IL

By Practice Area and Firm Size

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Practice Area	Firm Size	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Intellectual Property: Other	51-200 Lawyers	Partner	13	\$395	\$500	\$620	\$539	\$440	\$449
	More Than 1,000 Lawyers	Partner	23	\$803	\$905	\$1,071	\$956	\$861	\$709
		Associate	16	\$398	\$540	\$641	\$530	\$538	\$464
Intellectual Property: Patents	51-200 Lawyers	Partner	36	\$395	\$450	\$560	\$472	\$460	\$483
		Associate	23	\$248	\$264	\$309	\$285	\$281	\$274
	More Than 1,000 Lawyers	Partner	19	\$958	\$1,033	\$1,096	\$1,010	\$877	\$791
		Associate	20	\$487	\$621	\$743	\$642	\$561	\$475
Intellectual Property: Trademarks	More Than 1,000 Lawyers	Associate	11	\$355	\$540	\$580	\$491	\$491	\$485

## Section IV: In-Depth Analysis for Select US Cities

### Los Angeles CA

By Practice Area and Firm Size

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Practice Area	Firm Size	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Bankruptcy and Collections	50 Lawyers or Fewer	Associate	14	\$235	\$266	\$280	\$261	\$252	\$249
Commercial	50 Lawyers or Fewer	Partner	21	\$312	\$398	\$494	\$420	\$442	\$464
		Associate	14	\$276	\$295	\$410	\$343	\$328	\$305
	51-200 Lawyers	Partner	17	\$525	\$680	\$757	\$616	\$648	\$654
	201-500 Lawyers	Partner	16	\$567	\$671	\$740	\$642	\$544	\$552
	501-1,000 Lawyers	Partner	19	\$640	\$695	\$878	\$779	\$723	\$747
		Associate	37	\$416	\$482	\$598	\$521	\$527	\$507
	More Than 1,000 Lawyers	Partner	34	\$935	\$1,045	\$1,219	\$1,108	\$966	\$1,007
		Associate	76	\$565	\$688	\$865	\$739	\$700	\$614
Corporate: Governance	More Than 1,000 Lawyers	Partner	12	\$875	\$922	\$1,024	\$950	\$994	\$972
Corporate: Mergers, Acquisitions and Divestitures	501-1,000 Lawyers	Associate	16	\$461	\$606	\$700	\$593	\$590	\$506
Corporate: Other	50 Lawyers or Fewer	Partner	23	\$383	\$419	\$475	\$443	\$407	\$422
		Associate	23	\$260	\$300	\$340	\$317	\$322	\$285
	51-200 Lawyers	Partner	20	\$575	\$743	\$875	\$758	\$828	\$824
		Associate	16	\$408	\$450	\$585	\$487	\$480	\$541
	201-500 Lawyers	Partner	31	\$485	\$601	\$795	\$629	\$601	\$536
		Associate	17	\$408	\$428	\$502	\$476	\$408	\$406
	501-1,000 Lawyers	Partner	38	\$609	\$755	\$941	\$803	\$743	\$710
		Associate	41	\$405	\$486	\$674	\$534	\$514	\$512
	More Than 1,000 Lawyers	Partner	90	\$895	\$1,012	\$1,148	\$1,024	\$983	\$945
		Associate	83	\$534	\$650	\$765	\$646	\$630	\$609
Corporate: Regulatory and Compliance	501-1,000 Lawyers	Partner	18	\$690	\$763	\$874	\$793	\$959	\$846
		Associate	28	\$474	\$580	\$690	\$583	\$607	\$541
	More Than 1,000 Lawyers	Partner	39	\$875	\$1,000	\$1,103	\$999	\$970	\$952
		Associate	72	\$575	\$668	\$805	\$694	\$608	\$579

## Section IV: In-Depth Analysis for Select US Cities

### Los Angeles CA

By Practice Area and Firm Size

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Practice Area	Firm Size	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Employment and Labor: Discrimination, Retaliation and Harassment / EEO	501-1,000 Lawyers	Partner	13	\$400	\$450	\$495	\$483	\$533	\$472
		Associate	22	\$285	\$300	\$339	\$324	\$372	\$363
Employment and Labor: Other	51-200 Lawyers	Associate	11	\$375	\$460	\$488	\$477	\$415	\$419
	501-1,000 Lawyers	Partner	36	\$484	\$600	\$693	\$630	\$608	\$637
		Associate	32	\$335	\$405	\$466	\$433	\$486	\$469
	More Than 1,000 Lawyers	Partner	24	\$702	\$822	\$1,025	\$874	\$904	\$911
Associate		32	\$552	\$655	\$675	\$625	\$620	\$603	
Finance and Securities: Investments and Other Financial Instruments	501-1,000 Lawyers	Partner	25	\$685	\$775	\$936	\$832	\$758	\$805
		Associate	54	\$446	\$560	\$645	\$557	\$544	\$511
	More Than 1,000 Lawyers	Partner	54	\$1,095	\$1,250	\$1,463	\$1,256	\$1,141	\$1,110
		Associate	171	\$700	\$860	\$1,050	\$884	\$818	\$787
Finance and Securities: Loans and Financing	50 Lawyers or Fewer	Partner	12	\$300	\$437	\$585	\$459	\$386	\$391
	51-200 Lawyers	Partner	23	\$710	\$795	\$888	\$806	\$795	\$796
		Associate	17	\$435	\$545	\$617	\$537	\$537	\$600
	501-1,000 Lawyers	Associate	16	\$489	\$565	\$626	\$577	\$605	\$661
More Than 1,000 Lawyers	Associate	87	\$560	\$700	\$826	\$691	\$716	\$656	
	501-1,000 Lawyers	Associate	12	\$150	\$350	\$350	\$273	\$386	\$404
General Liability: Product and Product Liability	501-1,000 Lawyers	Partner	11	\$720	\$950	\$1,015	\$929	\$969	\$780
		Associate	45	\$675	\$730	\$830	\$735	\$677	\$538
	More Than 1,000 Lawyers	Partner	12	\$948	\$1,095	\$1,136	\$1,046	\$1,027	\$958
		Associate	32	\$446	\$600	\$695	\$608	\$643	\$634

## Section IV: In-Depth Analysis for Select US Cities

### New York NY

By Practice Area and Firm Size

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Practice Area	Firm Size	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Bankruptcy and Collections	50 Lawyers or Fewer	Associate	17	\$244	\$305	\$310	\$312	\$312	\$257
		Partner	23	\$400	\$436	\$564	\$485	\$531	\$512
	201-500 Lawyers	Associate	24	\$296	\$310	\$380	\$329	\$377	\$376
		Partner	11	\$604	\$772	\$1,220	\$974	\$640	\$742
	501-1,000 Lawyers	Associate	15	\$640	\$866	\$1,205	\$869	\$403	\$458
		Partner	11	\$566	\$890	\$1,085	\$830	\$812	\$706
More Than 1,000 Lawyers	Associate	11	\$347	\$410	\$603	\$499	\$464	\$377	
	50 Lawyers or Fewer	Partner	28	\$364	\$490	\$594	\$502	\$431	\$427
Commercial		Associate	17	\$316	\$360	\$460	\$394	\$392	\$359
	51-200 Lawyers	Partner	17	\$461	\$560	\$644	\$559	\$587	\$574
201-500 Lawyers		Partner	35	\$576	\$611	\$778	\$739	\$800	\$748
	Associate	24	\$398	\$460	\$576	\$518	\$551	\$582	
501-1,000 Lawyers	Partner	97	\$935	\$1,249	\$1,425	\$1,244	\$1,142	\$1,272	
	Associate	114	\$453	\$690	\$867	\$713	\$729	\$671	
More Than 1,000 Lawyers	Partner	59	\$968	\$1,143	\$1,459	\$1,183	\$1,067	\$1,018	
	Associate	65	\$568	\$727	\$1,013	\$804	\$680	\$693	
Corporate: Antitrust and Competition	501-1,000 Lawyers	Partner	30	\$1,249	\$1,493	\$1,500	\$1,388	\$1,280	\$1,170
		Associate	93	\$595	\$750	\$847	\$730	\$651	\$614
Corporate: Corporate Development	501-1,000 Lawyers	Associate	25	\$612	\$820	\$847	\$716	\$728	\$692
Corporate: Governance	501-1,000 Lawyers	Partner	52	\$1,249	\$1,394	\$1,500	\$1,340	\$1,266	\$1,257
		Associate	97	\$574	\$714	\$855	\$709	\$692	\$681
	More Than 1,000 Lawyers	Associate	14	\$550	\$650	\$727	\$657	\$734	\$703
Corporate: Mergers, Acquisitions and Divestitures	501-1,000 Lawyers	Partner	133	\$1,161	\$1,261	\$1,500	\$1,281	\$1,191	\$1,100
		Associate	264	\$564	\$750	\$865	\$728	\$670	\$614
	More Than 1,000 Lawyers	Partner	67	\$1,120	\$1,250	\$1,485	\$1,271	\$1,244	\$1,093
		Associate	109	\$550	\$785	\$951	\$762	\$762	\$691

## Section IV: In-Depth Analysis for Select US Cities

### New York NY

By Practice Area and Firm Size

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Practice Area	Firm Size	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Corporate: Other	50 Lawyers or Fewer	Partner	46	\$305	\$415	\$566	\$450	\$469	\$454
		Associate	36	\$285	\$305	\$315	\$294	\$330	\$325
	51-200 Lawyers	Partner	29	\$435	\$525	\$695	\$567	\$556	\$519
		Associate	29	\$305	\$400	\$554	\$436	\$380	\$357
	201-500 Lawyers	Partner	103	\$500	\$805	\$1,180	\$862	\$772	\$717
		Associate	78	\$325	\$434	\$644	\$494	\$447	\$434
	501-1,000 Lawyers	Partner	199	\$1,065	\$1,249	\$1,375	\$1,197	\$1,144	\$1,100
		Associate	356	\$515	\$735	\$847	\$709	\$668	\$657
More Than 1,000 Lawyers	Partner	143	\$996	\$1,250	\$1,462	\$1,217	\$1,079	\$981	
	Associate	217	\$540	\$765	\$920	\$748	\$686	\$642	
Corporate: Partnerships and Joint Ventures	501-1,000 Lawyers	Partner	45	\$1,249	\$1,249	\$1,249	\$1,263	\$1,223	\$1,175
		Associate	62	\$612	\$847	\$847	\$779	\$728	\$651
Corporate: Regulatory and Compliance	51-200 Lawyers	Partner	16	\$541	\$661	\$805	\$656	\$640	\$611
		Associate	16	\$401	\$515	\$592	\$509	\$502	\$376
	201-500 Lawyers	Partner	30	\$641	\$723	\$963	\$836	\$881	\$826
		Associate	30	\$356	\$400	\$446	\$430	\$556	\$537
	501-1,000 Lawyers	Partner	79	\$983	\$1,249	\$1,406	\$1,178	\$1,130	\$1,083
		Associate	110	\$532	\$728	\$878	\$734	\$622	\$618
More Than 1,000 Lawyers	Partner	49	\$902	\$1,060	\$1,268	\$1,078	\$1,056	\$993	
	Associate	32	\$577	\$684	\$849	\$708	\$666	\$634	
Corporate: Tax	501-1,000 Lawyers	Partner	28	\$1,075	\$1,249	\$1,534	\$1,264	\$1,210	\$1,211
		Associate	50	\$424	\$564	\$701	\$560	\$597	\$650
	More Than 1,000 Lawyers	Partner	46	\$844	\$1,093	\$1,346	\$1,136	\$1,038	\$1,076
		Associate	53	\$465	\$666	\$893	\$734	\$742	\$698
Corporate: Treasury	501-1,000 Lawyers	Partner	11	\$1,177	\$1,177	\$1,439	\$1,299	\$1,085	\$1,008
		Associate	13	\$516	\$714	\$744	\$698	\$622	\$588
Employment and Labor: Compensation and Benefits	501-1,000 Lawyers	Partner	24	\$620	\$1,060	\$1,284	\$968	\$871	\$978
		Associate	11	\$288	\$325	\$475	\$410	\$505	\$610
	More Than 1,000 Lawyers	Associate	11	\$465	\$486	\$526	\$511	\$492	\$466

## Section IV: In-Depth Analysis for Select US Cities

### New York NY

By Practice Area and Firm Size

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Practice Area	Firm Size	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Employment and Labor: Discrimination, Retaliation and Harassment / EEO	201-500 Lawyers	Associate	13	\$335	\$390	\$415	\$454	\$447	\$616
	501-1,000 Lawyers	Partner	28	\$450	\$473	\$546	\$571	\$622	\$533
		Associate	27	\$290	\$315	\$325	\$326	\$421	\$317
	More Than 1,000 Lawyers	Partner	11	\$640	\$758	\$829	\$753	\$735	\$746
Employment and Labor: Other	50 Lawyers or Fewer	Partner	21	\$490	\$646	\$796	\$630	\$588	\$562
		Associate	18	\$303	\$383	\$475	\$405	\$391	\$372
	51-200 Lawyers	Partner	11	\$610	\$680	\$750	\$662	\$547	\$602
		201-500 Lawyers	Partner	73	\$553	\$695	\$760	\$685	\$648
	Associate		73	\$350	\$410	\$595	\$466	\$426	\$426
	501-1,000 Lawyers	Partner	107	\$470	\$585	\$810	\$690	\$753	\$730
		Associate	72	\$325	\$411	\$680	\$515	\$596	\$532
	More Than 1,000 Lawyers	Partner	35	\$715	\$815	\$1,193	\$911	\$969	\$856
Associate		39	\$419	\$621	\$863	\$641	\$614	\$557	
Employment and Labor: Union Relations and Negotiations / NLRB	201-500 Lawyers	Partner	12	\$450	\$450	\$461	\$438	\$428	\$434
		Associate	13	\$264	\$320	\$360	\$310	\$265	\$285
	501-1,000 Lawyers	Partner	13	\$470	\$505	\$541	\$590	\$692	\$809
Environmental	51-200 Lawyers	Partner	12	\$350	\$390	\$515	\$426	\$405	\$393
Finance and Securities: Debt/Equity Offerings	501-1,000 Lawyers	Partner	40	\$944	\$1,055	\$1,330	\$1,099	\$1,119	\$1,086
		Associate	64	\$505	\$680	\$847	\$692	\$683	\$669
	More Than 1,000 Lawyers	Partner	29	\$624	\$910	\$1,316	\$998	\$912	\$940
		Associate	19	\$359	\$414	\$528	\$447	\$537	\$595
Finance and Securities: Investments and Other Financial Instruments	51-200 Lawyers	Partner	22	\$764	\$807	\$850	\$825	\$771	\$825
		Associate	17	\$400	\$591	\$653	\$540	\$567	\$507
	201-500 Lawyers	Partner	44	\$819	\$1,027	\$1,111	\$970	\$1,042	\$1,016
		Associate	47	\$428	\$512	\$692	\$561	\$587	\$554
	501-1,000 Lawyers	Partner	257	\$939	\$1,199	\$1,460	\$1,208	\$1,155	\$1,134
		Associate	465	\$560	\$680	\$867	\$713	\$698	\$697
	More Than 1,000 Lawyers	Partner	134	\$871	\$1,075	\$1,276	\$1,104	\$1,057	\$1,085
		Associate	106	\$466	\$615	\$743	\$608	\$662	\$695



## Section IV: In-Depth Analysis for Select US Cities

### New York NY

By Practice Area and Firm Size

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Practice Area	Firm Size	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Finance and Securities: Loans and Financing	50 Lawyers or Fewer	Partner	33	\$333	\$565	\$678	\$563	\$554	\$629
		Associate	23	\$310	\$310	\$330	\$344	\$350	\$403
	201-500 Lawyers	Partner	97	\$1,105	\$1,275	\$1,415	\$1,207	\$1,091	\$1,055
		Associate	151	\$575	\$745	\$885	\$709	\$656	\$657
	501-1,000 Lawyers	Partner	95	\$1,049	\$1,255	\$1,505	\$1,251	\$1,179	\$1,155
		Associate	136	\$603	\$778	\$920	\$766	\$773	\$676
More Than 1,000 Lawyers	Partner	74	\$1,212	\$1,390	\$1,510	\$1,339	\$1,228	\$1,154	
	Associate	134	\$670	\$905	\$1,042	\$860	\$798	\$753	
Finance and Securities: Other	501-1,000 Lawyers	Partner	25	\$1,249	\$1,249	\$1,368	\$1,303	\$1,341	\$1,204
		Associate	36	\$720	\$847	\$847	\$790	\$698	\$653
Finance and Securities: SEC Filings and Financial Reporting	501-1,000 Lawyers	Partner	26	\$1,249	\$1,284	\$1,393	\$1,291	\$1,107	\$1,049
		Associate	39	\$609	\$730	\$874	\$738	\$576	\$540
	More Than 1,000 Lawyers	Partner	11	\$1,173	\$1,510	\$1,549	\$1,383	\$1,085	\$1,154
Finance and Securities: Securities and Banking Regulations	501-1,000 Lawyers	Partner	29	\$915	\$1,204	\$1,330	\$1,138	\$1,130	\$1,153
		Associate	28	\$554	\$639	\$705	\$629	\$624	\$651
General Liability: Other	50 Lawyers or Fewer	Partner	12	\$176	\$195	\$235	\$206	\$245	\$204
	More Than 1,000 Lawyers	Associate	23	\$685	\$810	\$853	\$757	\$690	\$367
General Liability: Product and Product Liability	501-1,000 Lawyers	Partner	11	\$625	\$680	\$920	\$799	\$688	\$706
Insurance Defense: Auto and Transportation	51-200 Lawyers	Partner	29	\$155	\$175	\$190	\$177	\$177	\$185
		Associate	22	\$135	\$149	\$173	\$154	\$163	\$166
Insurance Defense: Other	50 Lawyers or Fewer	Partner	19	\$175	\$185	\$258	\$216	\$230	\$202
		Associate	21	\$159	\$185	\$195	\$182	\$190	\$175
	51-200 Lawyers	Partner	37	\$169	\$200	\$244	\$231	\$220	\$229
		Associate	28	\$150	\$175	\$175	\$179	\$178	\$171

## Section IV: In-Depth Analysis for Select US Cities

### New York NY

By Practice Area and Firm Size

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Practice Area	Firm Size	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Insurance Defense: Personal Injury/Wrongful Death	50 Lawyers or Fewer	Partner	50	\$163	\$174	\$189	\$176	\$179	\$176
		Associate	75	\$140	\$150	\$160	\$149	\$155	\$152
Insurance Defense: Property Damage	50 Lawyers or Fewer	Associate	45	\$134	\$146	\$153	\$145	\$153	\$149
	51-200 Lawyers	Partner	27	\$174	\$190	\$205	\$220	\$247	\$230
		Associate	25	\$150	\$150	\$155	\$158	\$169	\$172
	201-500 Lawyers	Partner	12	\$199	\$225	\$378	\$280	\$237	\$248
Intellectual Property: Other	501-1,000 Lawyers	Associate	33	\$556	\$620	\$812	\$663	\$644	\$680
Intellectual Property: Patents	50 Lawyers or Fewer	Partner	15	\$330	\$395	\$595	\$474	\$510	\$413
		Associate	18	\$378	\$465	\$500	\$459	\$466	\$370
	201-500 Lawyers	Partner	15	\$510	\$565	\$729	\$622	\$652	\$627
		Associate	16	\$325	\$375	\$375	\$366	\$369	\$385
	501-1,000 Lawyers	Partner	25	\$800	\$1,038	\$1,124	\$970	\$1,015	\$950
		Associate	34	\$473	\$595	\$817	\$612	\$681	\$623
	More Than 1,000 Lawyers	Partner	27	\$868	\$975	\$985	\$946	\$927	\$910
		Associate	28	\$500	\$673	\$793	\$653	\$589	\$604
Intellectual Property: Trademarks	50 Lawyers or Fewer	Partner	17	\$467	\$560	\$675	\$550	\$508	\$510
		Associate	19	\$258	\$315	\$385	\$332	\$322	\$318
Miscellaneous: General Advice & Counsel	More Than 1,000 Lawyers	Associate	17	\$660	\$907	\$1,025	\$842	\$702	\$717
Real Estate: Other	50 Lawyers or Fewer	Partner	11	\$375	\$475	\$550	\$464	\$425	\$405
		Associate	12	\$325	\$325	\$406	\$352	\$310	\$318
	201-500 Lawyers	Partner	11	\$524	\$555	\$580	\$609	\$694	\$622
		Associate	11	\$315	\$335	\$388	\$359	\$359	\$439
Requests for Information: Subpoena	501-1,000 Lawyers	Associate	12	\$515	\$650	\$883	\$666	\$488	\$433

## Section IV: In-Depth Analysis for Select US Cities

### Philadelphia PA

By Practice Area and Firm Size

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Practice Area	Firm Size	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Bankruptcy and Collections	51-200 Lawyers	Partner	12	\$318	\$418	\$463	\$387	\$269	\$401
	201-500 Lawyers	Partner	24	\$490	\$525	\$550	\$524	\$508	\$502
	More Than 1,000 Lawyers	Partner	12	\$410	\$438	\$673	\$506	\$466	\$477
Commercial	50 Lawyers or Fewer	Partner	12	\$325	\$381	\$540	\$458	\$552	\$523
		Associate	14	\$213	\$272	\$312	\$302	\$294	\$302
	51-200 Lawyers	Partner	23	\$347	\$447	\$604	\$488	\$521	\$551
		Associate	15	\$185	\$302	\$336	\$281	\$317	\$293
	201-500 Lawyers	Partner	54	\$486	\$565	\$699	\$594	\$563	\$579
		Associate	49	\$288	\$305	\$351	\$333	\$314	\$337
	501-1,000 Lawyers	Partner	35	\$677	\$768	\$810	\$740	\$707	\$691
		Associate	21	\$336	\$470	\$520	\$471	\$491	\$443
More Than 1,000 Lawyers	Partner	31	\$720	\$850	\$1,021	\$922	\$714	\$715	
Corporate: Antitrust and Competition	More Than 1,000 Lawyers	Partner	15	\$831	\$865	\$1,035	\$899	\$873	\$886
Corporate: Mergers, Acquisitions and Divestitures	201-500 Lawyers	Partner	33	\$495	\$525	\$525	\$512	\$536	\$528
	501-1,000 Lawyers	Partner	24	\$690	\$795	\$875	\$812	\$824	\$641
		Associate	25	\$405	\$420	\$500	\$466	\$440	\$402
Corporate: Other	51-200 Lawyers	Partner	36	\$551	\$740	\$800	\$699	\$634	\$579
		Associate	37	\$350	\$405	\$464	\$409	\$350	\$331
	201-500 Lawyers	Partner	52	\$525	\$538	\$760	\$627	\$571	\$548
		Associate	53	\$325	\$325	\$385	\$354	\$338	\$326
	501-1,000 Lawyers	Partner	32	\$596	\$765	\$890	\$770	\$731	\$763
		Associate	31	\$420	\$475	\$568	\$515	\$509	\$472
	More Than 1,000 Lawyers	Partner	64	\$625	\$803	\$875	\$803	\$802	\$772
		Associate	74	\$380	\$402	\$499	\$464	\$463	\$431

## Section IV: In-Depth Analysis for Select US Cities

### Philadelphia PA

By Practice Area and Firm Size

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Practice Area	Firm Size	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Corporate: Regulatory and Compliance	50 Lawyers or Fewer	Partner	11	\$434	\$520	\$620	\$530	\$568	\$520
	51-200 Lawyers	Partner	17	\$570	\$850	\$950	\$786	\$725	\$755
		Associate	15	\$350	\$420	\$500	\$435	\$381	\$360
	201-500 Lawyers	Partner	18	\$500	\$626	\$682	\$604	\$563	\$485
		Associate	17	\$252	\$292	\$368	\$316	\$308	\$281
More Than 1,000 Lawyers	Partner	33	\$625	\$789	\$803	\$729	\$727	\$763	
Employment and Labor: Other	201-500 Lawyers	Partner	12	\$434	\$478	\$527	\$487	\$596	\$539
	501-1,000 Lawyers	Partner	15	\$517	\$566	\$599	\$614	\$651	\$641
Finance and Securities: Investments and Other Financial Instruments	51-200 Lawyers	Partner	15	\$728	\$825	\$903	\$789	\$742	\$689
Finance and Securities: Loans and Financing	201-500 Lawyers	Partner	16	\$497	\$610	\$714	\$611	\$710	\$719
	501-1,000 Lawyers	Partner	13	\$786	\$915	\$1,160	\$966	\$726	\$724
	More Than 1,000 Lawyers	Partner	11	\$623	\$795	\$1,123	\$913	\$971	\$911
General Liability: Product and Product Liability	More Than 1,000 Lawyers	Associate	15	\$376	\$395	\$489	\$422	\$261	\$405
Insurance Defense: Other	50 Lawyers or Fewer	Partner	23	\$175	\$175	\$180	\$175	\$176	\$175
		Associate	31	\$160	\$160	\$160	\$158	\$164	\$160
Insurance Defense: Professional Liability	50 Lawyers or Fewer	Partner	20	\$400	\$400	\$400	\$366	\$228	\$212
		Associate	31	\$330	\$330	\$330	\$306	\$179	\$170

## Section IV: In-Depth Analysis for Select US Cities

### Philadelphia PA

By Practice Area and Firm Size

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Practice Area	Firm Size	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Insurance Defense: Property Damage	50 Lawyers or Fewer	Partner	16	\$173	\$180	\$180	\$175	\$177	\$170
		Associate	34	\$180	\$180	\$180	\$172	\$173	\$166
Intellectual Property: Patents	51-200 Lawyers	Partner	11	\$670	\$713	\$775	\$704	\$699	\$653
	201-500 Lawyers	Associate	15	\$288	\$288	\$333	\$311	\$339	\$302
		Partner	13	\$610	\$690	\$771	\$720	\$731	\$636
	501-1,000 Lawyers	Associate	13	\$414	\$452	\$482	\$484	\$424	\$362
Real Estate: Other	201-500 Lawyers	Partner	11	\$500	\$530	\$668	\$607	\$625	\$587

## Section IV: In-Depth Analysis for Select US Cities

### San Francisco CA

By Practice Area and Firm Size

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Practice Area	Firm Size	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Commercial	51-200 Lawyers	Partner	12	\$373	\$635	\$751	\$605	\$508	\$644
	501-1,000 Lawyers	Partner	19	\$739	\$860	\$1,162	\$926	\$955	\$973
		Associate	16	\$320	\$398	\$668	\$516	\$584	\$536
Corporate: Other	501-1,000 Lawyers	Partner	34	\$680	\$931	\$1,199	\$916	\$872	\$773
		Associate	30	\$438	\$508	\$670	\$564	\$571	\$549
	More Than 1,000 Lawyers	Partner	21	\$760	\$876	\$1,024	\$894	\$988	\$891
		Associate	17	\$415	\$546	\$714	\$554	\$547	\$446
Corporate: Regulatory and Compliance	501-1,000 Lawyers	Partner	20	\$659	\$788	\$979	\$819	\$908	\$832
Employment and Labor: Other	501-1,000 Lawyers	Partner	27	\$468	\$549	\$594	\$548	\$595	\$541
Finance and Securities: Investments and Other Financial Instruments	501-1,000 Lawyers	Partner	28	\$775	\$1,010	\$1,130	\$1,023	\$965	\$926
		Associate	29	\$634	\$755	\$820	\$735	\$608	\$604
Intellectual Property: Patents	501-1,000 Lawyers	Partner	16	\$995	\$1,120	\$1,245	\$1,099	\$1,027	\$899

## Section IV: In-Depth Analysis for Select US Cities

### Washington DC

By Practice Area and Firm Size

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Practice Area	Firm Size	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Commercial	50 Lawyers or Fewer	Partner	15	\$411	\$518	\$590	\$512	\$619	\$556
		Associate							
	51-200 Lawyers	Partner	13	\$610	\$680	\$700	\$676	\$632	\$590
		Associate							
	201-500 Lawyers	Partner	45	\$596	\$664	\$752	\$691	\$675	\$694
		Associate	48	\$350	\$438	\$508	\$445	\$408	\$439
	501-1,000 Lawyers	Partner	93	\$680	\$846	\$992	\$869	\$883	\$842
Associate		50	\$464	\$530	\$601	\$544	\$549	\$528	
More Than 1,000 Lawyers	Partner	99	\$793	\$950	\$1,193	\$994	\$887	\$868	
	Associate	59	\$476	\$625	\$746	\$634	\$603	\$557	
Corporate: Antitrust and Competition	501-1,000 Lawyers	Partner	33	\$740	\$857	\$960	\$896	\$893	\$890
		Associate	24	\$445	\$519	\$752	\$603	\$569	\$557
	More Than 1,000 Lawyers	Partner	29	\$745	\$796	\$905	\$842	\$848	\$864
		Associate	25	\$407	\$494	\$560	\$495	\$511	\$573
Corporate: Mergers, Acquisitions and Divestitures	201-500 Lawyers	Partner	14	\$653	\$784	\$805	\$740	\$786	\$712
		Associate	15	\$385	\$405	\$505	\$439	\$451	\$461
	501-1,000 Lawyers	Partner	18	\$702	\$938	\$1,080	\$931	\$978	\$991
		Associate							
More Than 1,000 Lawyers	Partner	54	\$904	\$985	\$1,194	\$1,028	\$1,046	\$855	
	Associate	36	\$533	\$673	\$806	\$671	\$605	\$511	
Corporate: Other	50 Lawyers or Fewer	Partner	30	\$474	\$580	\$657	\$573	\$571	\$540
		Associate	28	\$345	\$590	\$590	\$474	\$415	\$387
	51-200 Lawyers	Partner	40	\$680	\$781	\$988	\$807	\$760	\$743
		Associate	18	\$415	\$593	\$650	\$559	\$560	\$501
	201-500 Lawyers	Partner	83	\$590	\$712	\$814	\$721	\$735	\$720
		Associate	48	\$382	\$508	\$623	\$515	\$462	\$435
	501-1,000 Lawyers	Partner	187	\$761	\$880	\$935	\$885	\$853	\$806
		Associate	200	\$490	\$525	\$593	\$545	\$524	\$485
	More Than 1,000 Lawyers	Partner	203	\$795	\$910	\$1,044	\$939	\$875	\$845
		Associate	174	\$455	\$554	\$720	\$591	\$592	\$545

## Section IV: In-Depth Analysis for Select US Cities

### Washington DC

By Practice Area and Firm Size

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Practice Area	Firm Size	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017	
Corporate: Regulatory and Compliance	50 Lawyers or Fewer	Partner	61	\$523	\$575	\$630	\$582	\$561	\$547	
		Associate	33	\$293	\$329	\$369	\$362	\$299	\$318	
	51-200 Lawyers	Partner	40	\$602	\$788	\$968	\$787	\$747	\$681	
		Associate	28	\$335	\$375	\$569	\$453	\$416	\$425	
	201-500 Lawyers	Partner	54	\$640	\$705	\$870	\$730	\$710	\$710	
		Associate	40	\$355	\$460	\$516	\$469	\$433	\$446	
	501-1,000 Lawyers	Partner	151	\$740	\$871	\$1,000	\$890	\$893	\$863	
		Associate	143	\$458	\$530	\$632	\$566	\$580	\$540	
	More Than 1,000 Lawyers	Partner	143	\$819	\$925	\$1,058	\$969	\$915	\$871	
		Associate	117	\$460	\$593	\$720	\$593	\$579	\$562	
	Corporate: Tax	201-500 Lawyers	Partner	24	\$590	\$590	\$677	\$629	\$664	\$654
		More Than 1,000 Lawyers	Partner	48	\$840	\$944	\$1,175	\$1,028	\$953	\$945
Associate	50		\$469	\$618	\$792	\$677	\$603	\$590		
Employment and Labor: Other	201-500 Lawyers	Partner	19	\$550	\$701	\$735	\$697	\$619	\$644	
		Associate	17	\$513	\$625	\$625	\$559	\$576	\$562	
	501-1,000 Lawyers	Partner	48	\$607	\$694	\$921	\$764	\$784	\$798	
		Associate	41	\$365	\$445	\$595	\$484	\$555	\$527	
	More Than 1,000 Lawyers	Partner	22	\$596	\$719	\$836	\$768	\$789	\$788	
		Associate	18	\$375	\$436	\$621	\$479	\$447	\$483	
Environmental	501-1,000 Lawyers	Partner	11	\$774	\$853	\$893	\$786	\$801	\$717	
Finance and Securities: Investments and Other Financial Instruments	51-200 Lawyers	Partner	11	\$749	\$750	\$858	\$784	\$749	\$745	
	501-1,000 Lawyers	Partner	46	\$833	\$961	\$1,116	\$989	\$1,040	\$1,032	
		Associate	22	\$501	\$625	\$761	\$636	\$714	\$684	
	More Than 1,000 Lawyers	Partner	56	\$844	\$952	\$1,093	\$982	\$1,013	\$987	
Associate		21	\$480	\$630	\$829	\$654	\$631	\$717		
Finance and Securities: Loans and Financing	51-200 Lawyers	Partner	12	\$769	\$820	\$880	\$789	\$852	\$563	
	201-500 Lawyers	Partner	18	\$650	\$835	\$953	\$843	\$747	\$731	
		Associate	18	\$436	\$483	\$520	\$504	\$446	\$561	
	501-1,000 Lawyers	Partner	28	\$823	\$923	\$1,143	\$1,025	\$980	\$922	
	More Than 1,000 Lawyers	Partner	21	\$905	\$1,229	\$1,510	\$1,177	\$1,147	\$991	
		Associate	18	\$561	\$688	\$1,050	\$784	\$689	\$747	



## Section IV: In-Depth Analysis for Select US Cities

### Washington DC

By Practice Area and Firm Size

#### 2019 -- Real Rates for Partners and Associates

Practice Area	Firm Size	Role	n	First Quartile	Median	Third Quartile	Trend Analysis (Mean)		
							2019	2018	2017
General Liability: Product and Product Liability	501-1,000 Lawyers	Partner	14	\$554	\$740	\$856	\$717	\$672	\$720
		Associate	11	\$490	\$520	\$612	\$546	\$505	\$517
	More Than 1,000 Lawyers	Partner	11	\$935	\$966	\$1,013	\$965	\$995	\$951
		Associate	19	\$401	\$560	\$681	\$552	\$587	\$511
Government Relations	501-1,000 Lawyers	Partner	20	\$744	\$784	\$893	\$854	\$827	\$776
Intellectual Property: Other	501-1,000 Lawyers	Partner	12	\$698	\$779	\$828	\$818	\$754	\$725
Intellectual Property: Patents	50 Lawyers or Fewer	Partner	16	\$388	\$450	\$720	\$564	\$540	\$474
		Associate	17	\$302	\$325	\$346	\$332	\$314	\$308
	51-200 Lawyers	Partner	36	\$385	\$435	\$540	\$464	\$480	\$519
		Associate	30	\$300	\$330	\$365	\$337	\$310	\$325
	201-500 Lawyers	Partner	34	\$600	\$680	\$768	\$704	\$686	\$688
		Associate	35	\$377	\$444	\$533	\$455	\$406	\$422
	501-1,000 Lawyers	Partner	70	\$775	\$900	\$1,060	\$923	\$908	\$876
		Associate	74	\$490	\$609	\$695	\$620	\$582	\$596
	More Than 1,000 Lawyers	Partner	30	\$761	\$893	\$939	\$858	\$910	\$901
		Associate	38	\$496	\$525	\$692	\$586	\$634	\$525
Miscellaneous: General Advice & Counsel	More Than 1,000 Lawyers	Partner	11	\$888	\$1,200	\$1,200	\$1,078	\$735	\$896
Requests for Information: Subpoena	501-1,000 Lawyers	Partner	14	\$900	\$915	\$1,046	\$974	\$920	\$818

# Section V: International Analysis



**2020 Real Rate Report**

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## Section V: International Analysis

### Countries

2019 -- Real Rates for Partners, Associates, and Paralegals						Trend Analysis (Mean)		
Country	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Argentina	Partner	31	\$52	\$56	\$287	\$168	\$169	\$206
	Associate	47	\$47	\$136	\$238	\$148	\$163	\$208
Australia	Partner	154	\$375	\$484	\$588	\$498	\$516	\$536
	Associate	221	\$234	\$302	\$409	\$325	\$342	\$339
	Paralegal	38	\$134	\$156	\$210	\$205	\$184	\$198
Austria	Partner	19	\$388	\$420	\$681	\$544	\$588	\$593
	Associate	28	\$365	\$639	\$718	\$553	\$475	\$482
Belgium	Partner	57	\$368	\$529	\$752	\$571	\$628	\$597
	Associate	136	\$245	\$339	\$474	\$385	\$382	\$405
	Paralegal	27	\$155	\$249	\$280	\$243	\$240	\$248
Brazil	Partner	96	\$287	\$401	\$500	\$414	\$383	\$386
	Associate	185	\$165	\$234	\$300	\$239	\$228	\$231
	Paralegal	112	\$75	\$75	\$106	\$97	\$111	\$120
Bulgaria	Associate	11	\$143	\$170	\$193	\$171	\$159	\$146
Canada	Partner	759	\$418	\$557	\$735	\$584	\$570	\$552
	Associate	461	\$285	\$385	\$492	\$409	\$387	\$356
	Paralegal	414	\$138	\$207	\$281	\$212	\$201	\$189
Cayman Islands	Partner	33	\$920	\$950	\$1,076	\$973	\$947	\$964
Chile	Partner	11	\$320	\$325	\$350	\$403	\$335	\$293
	Associate	18	\$202	\$255	\$308	\$263	\$204	\$207
China	Partner	132	\$498	\$624	\$841	\$663	\$674	\$672
	Associate	265	\$230	\$341	\$474	\$370	\$385	\$357
	Paralegal	99	\$175	\$243	\$318	\$252	\$232	\$214
Colombia	Partner	13	\$349	\$419	\$570	\$442	\$342	\$251
	Associate	42	\$190	\$222	\$329	\$256	\$252	\$224
Czech Republic	Partner	15	\$170	\$312	\$434	\$354	\$344	\$381
	Associate	31	\$227	\$289	\$331	\$271	\$233	\$276
	Paralegal	11	\$94	\$100	\$128	\$106	\$117	\$114
Denmark	Partner	15	\$425	\$509	\$548	\$487	\$480	\$467
	Associate	25	\$187	\$244	\$358	\$273	\$311	\$306
Finland	Partner	15	\$307	\$574	\$599	\$474	\$540	\$531
	Associate	36	\$234	\$332	\$417	\$332	\$316	\$325
	Paralegal	15	\$86	\$86	\$114	\$106	\$132	\$148

## Section V: International Analysis

### Countries

2019 -- Real Rates for Partners, Associates, and Paralegals						Trend Analysis (Mean)		
Country	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
France	Partner	179	\$476	\$514	\$649	\$552	\$547	\$554
	Associate	362	\$275	\$350	\$450	\$375	\$367	\$350
	Paralegal	61	\$170	\$195	\$248	\$203	\$210	\$197
Germany	Partner	265	\$365	\$500	\$638	\$513	\$516	\$508
	Associate	422	\$328	\$366	\$469	\$412	\$391	\$378
	Paralegal	80	\$167	\$204	\$234	\$218	\$211	\$196
Greece	Associate	13	\$146	\$187	\$229	\$198	\$270	\$243
Hong Kong	Partner	76	\$730	\$842	\$1,009	\$873	\$816	\$801
	Associate	133	\$150	\$294	\$514	\$350	\$396	\$428
	Paralegal	44	\$235	\$280	\$338	\$294	\$263	\$251
India	Partner	28	\$312	\$327	\$375	\$352	\$361	\$369
	Associate	47	\$175	\$200	\$250	\$203	\$215	\$205
Indonesia	Associate	19	\$180	\$270	\$342	\$262	\$272	\$280
Ireland	Partner	79	\$442	\$557	\$605	\$523	\$543	\$536
	Associate	123	\$309	\$375	\$442	\$377	\$383	\$388
	Paralegal	81	\$160	\$172	\$230	\$198	\$213	\$211
Israel	Partner	32	\$234	\$391	\$467	\$371	\$397	\$368
	Associate	41	\$210	\$265	\$300	\$257	\$247	\$246
	Paralegal	27	\$110	\$150	\$210	\$155	\$152	\$142
Italy	Partner	41	\$303	\$477	\$598	\$495	\$478	\$546
	Associate	136	\$220	\$280	\$382	\$307	\$306	\$315
	Paralegal	23	\$111	\$147	\$209	\$154	\$132	\$151
Japan	Partner	89	\$300	\$440	\$655	\$498	\$449	\$450
	Associate	87	\$232	\$310	\$444	\$363	\$355	\$332
	Paralegal	38	\$118	\$161	\$198	\$168	\$175	\$148
Korea, Republic of	Partner	150	\$520	\$600	\$710	\$609	\$594	\$577
	Associate	157	\$220	\$300	\$350	\$286	\$303	\$308
	Paralegal	44	\$150	\$190	\$250	\$197	\$199	\$221
Luxembourg	Partner	33	\$598	\$676	\$760	\$673	\$716	\$708
	Associate	72	\$304	\$384	\$506	\$411	\$401	\$431
	Paralegal	16	\$211	\$254	\$275	\$245	\$233	\$248
Malaysia	Partner	11	\$380	\$517	\$600	\$473	\$493	\$363
	Associate	21	\$227	\$283	\$450	\$319	\$289	\$296

## Section V: International Analysis

### Countries

2019 -- Real Rates for Partners, Associates, and Paralegals						Trend Analysis (Mean)		
Country	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Mexico	Partner	34	\$257	\$345	\$457	\$357	\$305	\$261
	Associate	59	\$211	\$263	\$320	\$282	\$267	\$222
	Paralegal	21	\$89	\$105	\$169	\$124	\$127	\$125
Netherlands	Partner	92	\$429	\$505	\$643	\$547	\$580	\$581
	Associate	242	\$270	\$339	\$435	\$356	\$373	\$382
	Paralegal	36	\$166	\$225	\$258	\$210	\$261	\$247
New Zealand	Partner	20	\$385	\$459	\$500	\$427	\$411	\$410
	Associate	26	\$175	\$287	\$425	\$341	\$311	\$280
Norway	Partner	19	\$344	\$376	\$419	\$395	\$453	\$408
	Associate	19	\$217	\$249	\$300	\$269	\$309	\$239
Philippines	Associate	17	\$176	\$218	\$256	\$203	\$191	\$208
Poland	Partner	26	\$183	\$216	\$277	\$266	\$305	\$453
	Associate	102	\$155	\$179	\$239	\$206	\$208	\$276
	Paralegal	18	\$83	\$94	\$106	\$99	\$97	\$112
Russian Federation	Partner	38	\$580	\$701	\$800	\$683	\$655	\$652
	Associate	109	\$300	\$350	\$475	\$380	\$379	\$369
	Paralegal	67	\$123	\$150	\$205	\$163	\$174	\$186
Saudi Arabia	Associate	13	\$385	\$414	\$510	\$426	\$445	\$451
Singapore	Partner	57	\$468	\$641	\$842	\$630	\$625	\$589
	Associate	93	\$302	\$442	\$610	\$464	\$445	\$428
	Paralegal	13	\$205	\$240	\$354	\$258	\$300	\$229
Slovakia	Associate	11	\$102	\$217	\$290	\$225	\$262	\$268
South Africa	Partner	28	\$255	\$340	\$391	\$323	\$324	\$310
	Associate	31	\$152	\$175	\$215	\$195	\$169	\$179
Spain	Partner	50	\$373	\$534	\$716	\$537	\$488	\$500
	Associate	151	\$253	\$359	\$474	\$378	\$350	\$361
	Paralegal	27	\$187	\$195	\$234	\$215	\$181	\$202
Sweden	Partner	17	\$334	\$358	\$417	\$404	\$441	\$453
	Associate	22	\$217	\$337	\$394	\$311	\$308	\$317
Switzerland	Partner	37	\$387	\$481	\$559	\$506	\$511	\$524
	Associate	50	\$285	\$347	\$406	\$353	\$328	\$353
Taiwan	Partner	31	\$336	\$360	\$459	\$394	\$426	\$422
	Associate	94	\$146	\$189	\$260	\$215	\$230	\$214
	Paralegal	37	\$115	\$200	\$200	\$165	\$186	\$161

## Section V: International Analysis

### Countries

2019 -- Real Rates for Partners, Associates, and Paralegals						Trend Analysis (Mean)		
Country	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Thailand	Partner	14	\$210	\$388	\$834	\$505	\$470	\$462
	Associate	17	\$319	\$344	\$509	\$416	\$372	\$285
Turkey	Partner	13	\$345	\$401	\$443	\$395	\$391	\$412
	Associate	41	\$175	\$205	\$229	\$209	\$214	\$211
Ukraine	Partner	11	\$260	\$400	\$413	\$351	\$318	\$328
	Associate	18	\$210	\$290	\$315	\$272	\$271	\$210
United Arab Emirates	Partner	32	\$569	\$688	\$762	\$693	\$713	\$727
	Associate	63	\$345	\$440	\$535	\$459	\$494	\$489
	Paralegal	17	\$163	\$209	\$323	\$249	\$283	\$310
United Kingdom	Partner	615	\$626	\$733	\$894	\$764	\$733	\$718
	Associate	1149	\$358	\$482	\$608	\$494	\$487	\$477
	Paralegal	343	\$135	\$185	\$233	\$188	\$211	\$219
United States	Partner	14142	\$400	\$610	\$894	\$680	\$659	\$630
	Associate	14341	\$295	\$425	\$615	\$479	\$462	\$439
	Paralegal	6431	\$150	\$213	\$289	\$225	\$211	\$201

## Section V: International Analysis

### Australia

By Role

#### 2019 -- Real Rates for Partners, Associates, and Paralegals

#### Trend Analysis (Mean)

Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Partner	154	\$375	\$484	\$588	\$498	\$516	\$536
Associate	221	\$234	\$302	\$409	\$325	\$342	\$339
Paralegal	38	\$134	\$156	\$210	\$205	\$184	\$198

## Section V: International Analysis

### Australia

By Practice Area and Matter Type

2019 -- Real Rates for Partners, Associates, and Paralegals							Trend Analysis (Mean)		
Practice Area	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Commercial	Non-Litigation	Partner	21	\$356	\$380	\$463	\$401	\$463	\$451
		Associate	26	\$208	\$225	\$286	\$254	\$307	\$293
Corporate: Other	Non-Litigation	Associate	12	\$228	\$240	\$331	\$268	\$318	\$355
Corporate: Regulatory and Compliance	Non-Litigation	Partner	17	\$369	\$481	\$559	\$446	\$475	\$502
		Associate	31	\$227	\$300	\$362	\$302	\$297	\$321
Employment and Labor: Other	Non-Litigation	Associate	11	\$294	\$407	\$416	\$356	\$320	\$319
Intellectual Property: Patents	Litigation	Partner	14	\$295	\$489	\$605	\$486	\$605	\$632
		Associate	37	\$250	\$325	\$451	\$352	\$352	\$355
	Non-Litigation	Partner	21	\$295	\$473	\$589	\$466	\$490	\$560
		Associate	19	\$274	\$434	\$518	\$407	\$378	\$411
Intellectual Property: Trademarks	Non-Litigation	Associate	11	\$242	\$302	\$384	\$317	\$374	\$357



## Section V: International Analysis

### Australia

By Industry Group and Matter Type

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Industry Group	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Financials Excluding Insurance	Non-Litigation	Partner	39	\$532	\$572	\$643	\$615	\$587	\$651
		Associate	54	\$244	\$352	\$408	\$344	\$390	\$366
Health Care	Litigation	Partner	19	\$311	\$395	\$596	\$468	\$551	\$558
		Associate	39	\$242	\$325	\$450	\$345	\$352	\$334
	Non-Litigation	Partner	20	\$402	\$535	\$671	\$545	\$524	\$540
		Associate	25	\$279	\$420	\$488	\$394	\$371	\$363
Industrials	Non-Litigation	Partner	13	\$460	\$535	\$671	\$558	\$585	\$609
Technology and Telecommunications	Non-Litigation	Partner	34	\$357	\$458	\$487	\$431	\$466	\$514
		Associate	59	\$209	\$272	\$354	\$293	\$296	\$309

## Section V: International Analysis

### Australia

By Firm Size

2019 -- Real Rates for Partners and Associates						Trend Analysis (Mean)		
Firm Size	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
51-200 Lawyers	Partner	21	\$317	\$368	\$381	\$362	\$473	\$467
	Associate	28	\$195	\$278	\$394	\$301	\$314	\$323
201-500 Lawyers	Partner	17	\$527	\$582	\$594	\$564	\$582	\$633
	Associate	34	\$271	\$344	\$433	\$348	\$363	\$352
501-1,000 Lawyers	Associate	11	\$273	\$330	\$369	\$328	\$341	\$343
More Than 1,000 Lawyers	Partner	39	\$528	\$580	\$720	\$623	\$604	\$641
	Associate	57	\$304	\$375	\$427	\$373	\$403	\$393

## Section V: International Analysis

### Canada

By Role

2019 -- Real Rates for Partners, Associates, and Paralegals					Trend Analysis (Mean)		
Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Partner	759	\$418	\$557	\$735	\$584	\$570	\$552
Associate	461	\$285	\$385	\$492	\$409	\$387	\$356
Paralegal	414	\$138	\$207	\$281	\$212	\$201	\$189

## Section V: International Analysis

### Canada

By Practice Area and Matter Type

#### 2019 -- Real Rates for Partners, Associates, and Paralegals

#### Trend Analysis (Mean)

Practice Area	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Bankruptcy and Collections	Non-Litigation	Partner	29	\$313	\$389	\$406	\$379	\$396	\$398
Commercial	Litigation	Partner	140	\$368	\$495	\$651	\$523	\$520	\$517
		Associate	123	\$285	\$374	\$494	\$407	\$389	\$353
	Non-Litigation	Partner	147	\$499	\$662	\$819	\$652	\$655	\$629
		Associate	69	\$390	\$490	\$659	\$525	\$470	\$422
		Paralegal	55	\$210	\$263	\$314	\$270	\$234	\$233
Corporate: Other	Litigation	Partner	61	\$452	\$630	\$734	\$606	\$572	\$518
		Associate	26	\$396	\$458	\$580	\$488	\$455	\$365
		Paralegal	46	\$214	\$256	\$311	\$254	\$218	\$193
	Non-Litigation	Partner	179	\$498	\$656	\$806	\$656	\$659	\$616
		Associate	76	\$339	\$450	\$620	\$483	\$479	\$442
		Paralegal	84	\$172	\$230	\$293	\$230	\$230	\$208
Corporate: Regulatory and Compliance	Litigation	Partner	14	\$486	\$614	\$773	\$635	\$686	\$539
	Non-Litigation	Partner	43	\$525	\$630	\$702	\$624	\$628	\$583
		Paralegal	11	\$233	\$282	\$328	\$277	\$251	\$221
Corporate: Tax	Non-Litigation	Partner	21	\$850	\$875	\$895	\$814	\$695	\$716
Employment and Labor: Other	Litigation	Partner	12	\$413	\$506	\$674	\$567	\$562	\$534
	Non-Litigation	Partner	45	\$424	\$525	\$634	\$566	\$514	\$490
		Associate	20	\$327	\$437	\$597	\$473	\$331	\$335
Finance and Securities: Investments and Other Financial Instruments	Non-Litigation	Partner	87	\$590	\$760	\$872	\$742	\$716	\$683
		Associate	28	\$394	\$440	\$550	\$495	\$552	\$477
		Paralegal	36	\$281	\$300	\$361	\$302	\$267	\$247
Finance and Securities: Loans and Financing	Non-Litigation	Partner	30	\$547	\$644	\$704	\$619	\$626	\$668
		Paralegal	12	\$170	\$224	\$255	\$211	\$229	\$226
General Liability: Product and Product Liability	Litigation	Partner	15	\$470	\$528	\$580	\$540	\$520	\$497
Insurance Defense: Other	Litigation	Partner	17	\$225	\$290	\$335	\$315	\$318	\$253

## Section V: International Analysis

### Canada

By Practice Area and Matter Type

#### 2019 -- Real Rates for Partners, Associates, and Paralegals

#### Trend Analysis (Mean)

Practice Area	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Intellectual Property: Patents	Litigation	Partner	23	\$396	\$560	\$698	\$550	\$575	\$493
	Non-Litigation	Partner	22	\$315	\$435	\$463	\$421	\$436	\$441
		Associate	12	\$220	\$300	\$331	\$272	\$264	\$252
Intellectual Property: Trademarks	Non-Litigation	Partner	15	\$385	\$470	\$590	\$480	\$502	\$481

## Section V: International Analysis

### Canada

By Industry Group and Matter Type

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Industry Group	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Consumer Services	Non-Litigation	Partner	16	\$555	\$696	\$770	\$672	\$759	\$817
Financials Excluding Insurance	Litigation	Partner	288	\$367	\$465	\$594	\$501	\$489	\$480
		Associate	146	\$395	\$492	\$653	\$526	\$496	\$439
	Non-Litigation	Partner	334	\$525	\$700	\$850	\$684	\$671	\$641
Health Care	Litigation	Partner	39	\$412	\$555	\$662	\$554	\$562	\$506
		Associate	13	\$298	\$333	\$411	\$329	\$314	\$281
	Non-Litigation	Partner	26	\$406	\$470	\$585	\$486	\$471	\$500
		Associate	11	\$238	\$278	\$333	\$289	\$286	\$304
Industrials	Litigation	Partner	13	\$463	\$667	\$690	\$579	\$410	\$396
		Associate	18	\$254	\$303	\$376	\$313	\$292	\$300
	Non-Litigation	Partner	53	\$417	\$503	\$627	\$550	\$464	\$436
Technology and Telecommunications	Litigation	Partner	20	\$427	\$556	\$605	\$549	\$556	\$506
		Associate	34	\$270	\$358	\$436	\$352	\$327	\$310
	Non-Litigation	Partner	63	\$401	\$533	\$636	\$518	\$492	\$502

## Section V: International Analysis

### Canada

By Firm Size

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Firm Size	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
50 Lawyers or Fewer	Partner	61	\$350	\$397	\$466	\$420	\$411	\$406
	Associate	55	\$243	\$275	\$332	\$291	\$271	\$253
51-200 Lawyers	Partner	128	\$404	\$495	\$595	\$514	\$500	\$526
	Associate	69	\$266	\$350	\$450	\$375	\$340	\$346
201-500 Lawyers	Partner	268	\$486	\$649	\$805	\$641	\$640	\$595
	Associate	148	\$334	\$419	\$505	\$437	\$432	\$385
501-1,000 Lawyers	Partner	230	\$495	\$604	\$769	\$626	\$604	\$586
	Associate	138	\$335	\$442	\$585	\$478	\$432	\$383

## Section V: International Analysis

### France

By Role

#### 2019 -- Real Rates for Partners, Associates, and Paralegals

#### Trend Analysis (Mean)

Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Partner	179	\$476	\$514	\$649	\$552	\$547	\$554
Associate	362	\$275	\$350	\$450	\$375	\$367	\$350
Paralegal	61	\$170	\$195	\$248	\$203	\$210	\$197



## Section V: International Analysis

### France

By Practice Area and Matter Type

#### 2019 -- Real Rates for Partners, Associates, and Paralegals

#### Trend Analysis (Mean)

Practice Area	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Commercial	Litigation	Partner	17	\$377	\$494	\$531	\$461	\$500	\$472
		Associate	19	\$232	\$290	\$335	\$300	\$367	\$282
	Non-Litigation	Partner	15	\$469	\$550	\$684	\$568	\$495	\$492
		Associate	26	\$235	\$341	\$475	\$386	\$350	\$284
Corporate: Mergers, Acquisitions and Divestitures	Non-Litigation	Partner	14	\$500	\$527	\$775	\$624	\$948	\$660
		Associate	21	\$315	\$476	\$626	\$499	\$481	\$429
Corporate: Other	Non-Litigation	Partner	32	\$353	\$456	\$540	\$512	\$467	\$493
		Associate	36	\$193	\$259	\$411	\$354	\$331	\$318
Corporate: Regulatory and Compliance	Non-Litigation	Partner	14	\$493	\$504	\$563	\$530	\$569	\$539
		Associate	21	\$252	\$265	\$334	\$310	\$312	\$316
Employment and Labor: Other	Non-Litigation	Associate	12	\$288	\$316	\$427	\$350	\$333	\$345
Finance and Securities: Investments and Other Financial Instruments	Non-Litigation	Partner	25	\$510	\$594	\$758	\$641	\$630	\$770
		Associate	55	\$292	\$377	\$466	\$398	\$408	\$510

## Section V: International Analysis

### France

By Industry Group and Matter Type

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Industry Group	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Financials Excluding Insurance	Litigation	Associate	11	\$290	\$300	\$425	\$353	\$346	\$410
	Non-Litigation	Partner	93	\$496	\$514	\$665	\$558	\$558	\$562
		Associate	204	\$290	\$373	\$454	\$382	\$372	\$368
Health Care	Litigation	Partner	12	\$594	\$648	\$705	\$644	\$653	\$598
		Associate	34	\$290	\$356	\$464	\$390	\$384	\$381
	Non-Litigation	Partner	18	\$569	\$707	\$843	\$709	\$655	\$559
		Associate	33	\$277	\$403	\$600	\$439	\$376	\$294
Technology and Telecommunications	Litigation	Associate	12	\$252	\$291	\$362	\$321	\$296	\$318
	Non-Litigation	Partner	30	\$432	\$495	\$568	\$488	\$489	\$512
		Associate	49	\$245	\$268	\$327	\$294	\$304	\$296

## Section V: International Analysis

### France

By Firm Size

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Firm Size	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
50 Lawyers or Fewer	Partner	16	\$316	\$362	\$453	\$409	\$404	\$438
	Associate	22	\$165	\$227	\$258	\$231	\$219	\$227
51-200 Lawyers	Partner	11	\$450	\$475	\$504	\$481	\$470	\$480
	Associate	21	\$239	\$250	\$317	\$270	\$258	\$246
501-1,000 Lawyers	Partner	21	\$500	\$500	\$550	\$558	\$566	\$627
	Associate	58	\$290	\$350	\$450	\$379	\$384	\$340
More Than 1,000 Lawyers	Partner	85	\$515	\$606	\$721	\$631	\$619	\$609
	Associate	206	\$304	\$399	\$490	\$418	\$403	\$395

## Section V: International Analysis

### Germany

By Role

2019 -- Real Rates for Partners, Associates, and Paralegals					Trend Analysis (Mean)		
Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Partner	265	\$365	\$500	\$638	\$513	\$516	\$508
Associate	422	\$328	\$366	\$469	\$412	\$391	\$378
Paralegal	80	\$167	\$204	\$234	\$218	\$211	\$196

## Section V: International Analysis

### Germany

By Practice Area and Matter Type

2019 -- Real Rates for Partners, Associates, and Paralegals							Trend Analysis (Mean)		
Practice Area	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Commercial	Non-Litigation	Partner	33	\$353	\$411	\$501	\$407	\$426	\$414
		Associate	46	\$296	\$332	\$353	\$326	\$325	\$335
Corporate: Other	Litigation	Partner	13	\$357	\$563	\$625	\$504	\$561	\$594
	Non-Litigation	Partner	12	\$489	\$575	\$665	\$577	\$512	\$511
		Associate	14	\$376	\$422	\$556	\$470	\$402	\$351
Corporate: Regulatory and Compliance	Non-Litigation	Partner	37	\$353	\$402	\$548	\$471	\$468	\$505
		Associate	64	\$336	\$353	\$381	\$385	\$365	\$377
Corporate: Tax	Non-Litigation	Associate	13	\$371	\$450	\$534	\$450	\$453	\$387
Employment and Labor: Other	Non-Litigation	Associate	17	\$260	\$334	\$335	\$302	\$372	\$412
Finance and Securities: Loans and Financing	Non-Litigation	Partner	20	\$611	\$735	\$835	\$711	\$663	\$646
Intellectual Property: Other	Non-Litigation	Partner	13	\$307	\$328	\$406	\$344	\$371	\$380
Intellectual Property: Patents	Litigation	Partner	32	\$424	\$547	\$689	\$550	\$571	\$502
		Associate	30	\$333	\$360	\$437	\$386	\$385	\$362
	Non-Litigation	Partner	55	\$331	\$386	\$463	\$407	\$429	\$444
		Associate	46	\$278	\$338	\$373	\$374	\$343	\$346
Intellectual Property: Trademarks	Non-Litigation	Associate	15	\$355	\$378	\$393	\$374	\$375	\$345
		Paralegal	15	\$219	\$233	\$235	\$228	\$232	\$170

## Section V: International Analysis

### Germany

By Industry Group and Matter Type

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Industry Group	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Financials Excluding Insurance	Non-Litigation	Partner	49	\$558	\$629	\$810	\$669	\$671	\$684
		Associate	124	\$362	\$435	\$575	\$468	\$458	\$443
Health Care	Litigation	Partner	28	\$428	\$545	\$697	\$563	\$578	\$527
		Associate	41	\$349	\$388	\$507	\$425	\$411	\$387
	Non-Litigation	Partner	49	\$376	\$412	\$509	\$463	\$465	\$488
		Associate	73	\$275	\$337	\$401	\$364	\$341	\$360
Industrials	Non-Litigation	Partner	27	\$326	\$337	\$488	\$445	\$448	\$417
		Associate	33	\$365	\$562	\$741	\$553	\$438	\$361
Technology and Telecommunications	Litigation	Partner	27	\$365	\$594	\$681	\$548	\$554	\$522
	Non-Litigation	Partner	81	\$353	\$413	\$541	\$453	\$435	\$424
		Associate	105	\$319	\$353	\$372	\$365	\$342	\$337

## Section V: International Analysis

### Germany

By Firm Size

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Firm Size	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
50 Lawyers or Fewer	Partner	13	\$329	\$386	\$458	\$377	\$406	\$376
	Associate	17	\$287	\$348	\$412	\$355	\$365	\$378
51-200 Lawyers	Partner	20	\$356	\$366	\$403	\$373	\$382	\$347
	Associate	14	\$275	\$312	\$335	\$317	\$304	\$282
201-500 Lawyers	Partner	45	\$353	\$412	\$500	\$420	\$433	\$398
	Associate	54	\$299	\$353	\$362	\$339	\$339	\$331
501-1,000 Lawyers	Associate	14	\$294	\$368	\$402	\$363	\$356	\$328
More Than 1,000 Lawyers	Partner	128	\$512	\$620	\$753	\$626	\$623	\$616
	Associate	274	\$343	\$407	\$549	\$445	\$427	\$412

## Section V: International Analysis

### United Kingdom

By Role

#### 2019 -- Real Rates for Partners, Associates, and Paralegals

#### Trend Analysis (Mean)

Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Partner	615	\$626	\$733	\$894	\$764	\$733	\$718
Associate	1149	\$358	\$482	\$608	\$494	\$487	\$477
Paralegal	343	\$135	\$185	\$233	\$188	\$211	\$219



## Section V: International Analysis

### United Kingdom

By Practice Area and Matter Type

#### 2019 -- Real Rates for Partners, Associates, and Paralegals

#### Trend Analysis (Mean)

Practice Area	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Commercial	Non-Litigation	Partner	33	\$567	\$682	\$761	\$711	\$612	\$574
		Associate	57	\$320	\$428	\$545	\$456	\$409	\$394
		Paralegal	14	\$138	\$194	\$217	\$187	\$163	\$182
Corporate: Mergers, Acquisitions and Divestitures	Non-Litigation	Partner	11	\$819	\$900	\$1,152	\$966	\$789	\$741
		Associate	41	\$439	\$525	\$679	\$556	\$527	\$484
Corporate: Other	Litigation	Partner	25	\$688	\$822	\$1,218	\$897	\$739	\$749
		Associate	42	\$407	\$495	\$564	\$482	\$450	\$504
		Paralegal	16	\$142	\$191	\$208	\$193	\$188	\$270
	Non-Litigation	Partner	59	\$658	\$747	\$947	\$811	\$785	\$691
		Associate	93	\$445	\$513	\$635	\$561	\$519	\$448
		Paralegal	69	\$67	\$67	\$67	\$102	\$235	\$222
Corporate: Regulatory and Compliance	Non-Litigation	Partner	67	\$619	\$723	\$872	\$738	\$733	\$717
		Associate	104	\$354	\$437	\$548	\$460	\$476	\$478
		Paralegal	14	\$175	\$181	\$194	\$191	\$218	\$249
Corporate: Tax	Non-Litigation	Partner	29	\$698	\$846	\$1,046	\$884	\$706	\$774
		Associate	34	\$348	\$438	\$600	\$466	\$445	\$504
Employment and Labor: Agreements	Non-Litigation	Partner	23	\$550	\$701	\$701	\$623	\$509	\$530
		Associate	34	\$273	\$417	\$493	\$388	\$348	\$391
Employment and Labor: Other	Litigation	Associate	42	\$358	\$506	\$656	\$502	\$498	\$559
	Non-Litigation	Partner	41	\$533	\$627	\$743	\$643	\$635	\$658
Associate		67	\$308	\$421	\$581	\$456	\$439	\$444	
Finance and Securities: Debt/Equity Offerings	Non-Litigation	Partner	72	\$696	\$735	\$860	\$781	\$763	\$692
		Associate	163	\$362	\$505	\$632	\$518	\$496	\$455
Finance and Securities: Investments and Other Financial Instruments	Non-Litigation	Partner	80	\$687	\$735	\$847	\$776	\$759	\$822
		Associate	161	\$390	\$501	\$607	\$511	\$500	\$507
		Paralegal	42	\$171	\$196	\$282	\$217	\$211	\$208

## Section V: International Analysis

### United Kingdom

By Practice Area and Matter Type

2019 -- Real Rates for Partners, Associates, and Paralegals							Trend Analysis (Mean)		
Practice Area	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Finance and Securities: Loans and Financing	Non-Litigation	Partner	59	\$696	\$1,019	\$1,200	\$984	\$959	\$933
		Associate	100	\$435	\$574	\$777	\$595	\$613	\$578
		Paralegal	15	\$275	\$297	\$361	\$318	\$285	\$257
Intellectual Property: Other	Non-Litigation	Partner	17	\$254	\$340	\$701	\$471	\$397	\$434
		Associate	18	\$315	\$411	\$619	\$464	\$306	\$355
Intellectual Property: Patents	Litigation	Partner	26	\$666	\$784	\$840	\$749	\$727	\$715
		Associate	42	\$421	\$496	\$613	\$500	\$478	\$462
	Non-Litigation	Partner	19	\$355	\$448	\$571	\$455	\$432	\$455
		Associate	21	\$305	\$349	\$404	\$363	\$325	\$324
		Paralegal	16	\$139	\$169	\$231	\$175	\$202	\$208
Intellectual Property: Trademarks	Non-Litigation	Associate	26	\$305	\$340	\$421	\$391	\$397	\$390
		Paralegal	22	\$183	\$193	\$218	\$205	\$202	\$195
Miscellaneous: General Advice & Counsel	Non-Litigation	Associate	14	\$439	\$513	\$664	\$507	\$437	\$378

## Section V: International Analysis

### United Kingdom

By Industry Group and Matter Type

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Industry Group	Matter Type	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Consumer Services	Non-Litigation	Associate	12	\$360	\$410	\$515	\$467	\$465	\$349
Financials Excluding Insurance	Litigation	Partner	33	\$736	\$814	\$949	\$826	\$839	\$894
		Associate	70	\$381	\$509	\$584	\$498	\$508	\$599
	Non-Litigation	Partner	286	\$684	\$751	\$938	\$827	\$803	\$824
		Associate	572	\$387	\$505	\$634	\$522	\$519	\$521
Health Care	Litigation	Partner	38	\$626	\$776	\$896	\$754	\$742	\$700
		Associate	60	\$408	\$458	\$580	\$484	\$510	\$472
	Non-Litigation	Partner	47	\$442	\$650	\$757	\$643	\$634	\$604
		Associate	74	\$320	\$370	\$485	\$412	\$394	\$378
Industrials	Litigation	Partner	14	\$792	\$1,218	\$1,218	\$1,022	\$700	\$699
	Non-Litigation	Partner	42	\$280	\$768	\$1,192	\$757	\$529	\$560
		Associate	53	\$369	\$585	\$785	\$588	\$413	\$433
Technology and Telecommunications	Litigation	Partner	11	\$690	\$775	\$820	\$756	\$685	\$710
		Associate	18	\$344	\$503	\$596	\$496	\$416	\$450
	Non-Litigation	Partner	108	\$562	\$676	\$745	\$656	\$620	\$604
		Associate	204	\$297	\$411	\$515	\$425	\$419	\$387

## Section V: International Analysis

### United Kingdom

By Firm Size

#### 2019 -- Real Rates for Partners and Associates

#### Trend Analysis (Mean)

Firm Size	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
50 Lawyers or Fewer	Partner	15	\$610	\$626	\$667	\$602	\$529	\$449
	Associate	20	\$305	\$340	\$393	\$351	\$413	\$390
51-200 Lawyers	Partner	22	\$255	\$317	\$504	\$437	\$483	\$483
	Associate	25	\$268	\$309	\$393	\$347	\$373	\$351
201-500 Lawyers	Partner	38	\$580	\$701	\$756	\$676	\$695	\$635
	Associate	71	\$355	\$428	\$493	\$427	\$448	\$384
501-1,000 Lawyers	Partner	20	\$797	\$1,058	\$1,266	\$1,027	\$844	\$864
	Associate	44	\$425	\$597	\$815	\$603	\$547	\$531
More Than 1,000 Lawyers	Partner	392	\$683	\$757	\$936	\$817	\$793	\$787
	Associate	775	\$364	\$507	\$634	\$513	\$515	\$510

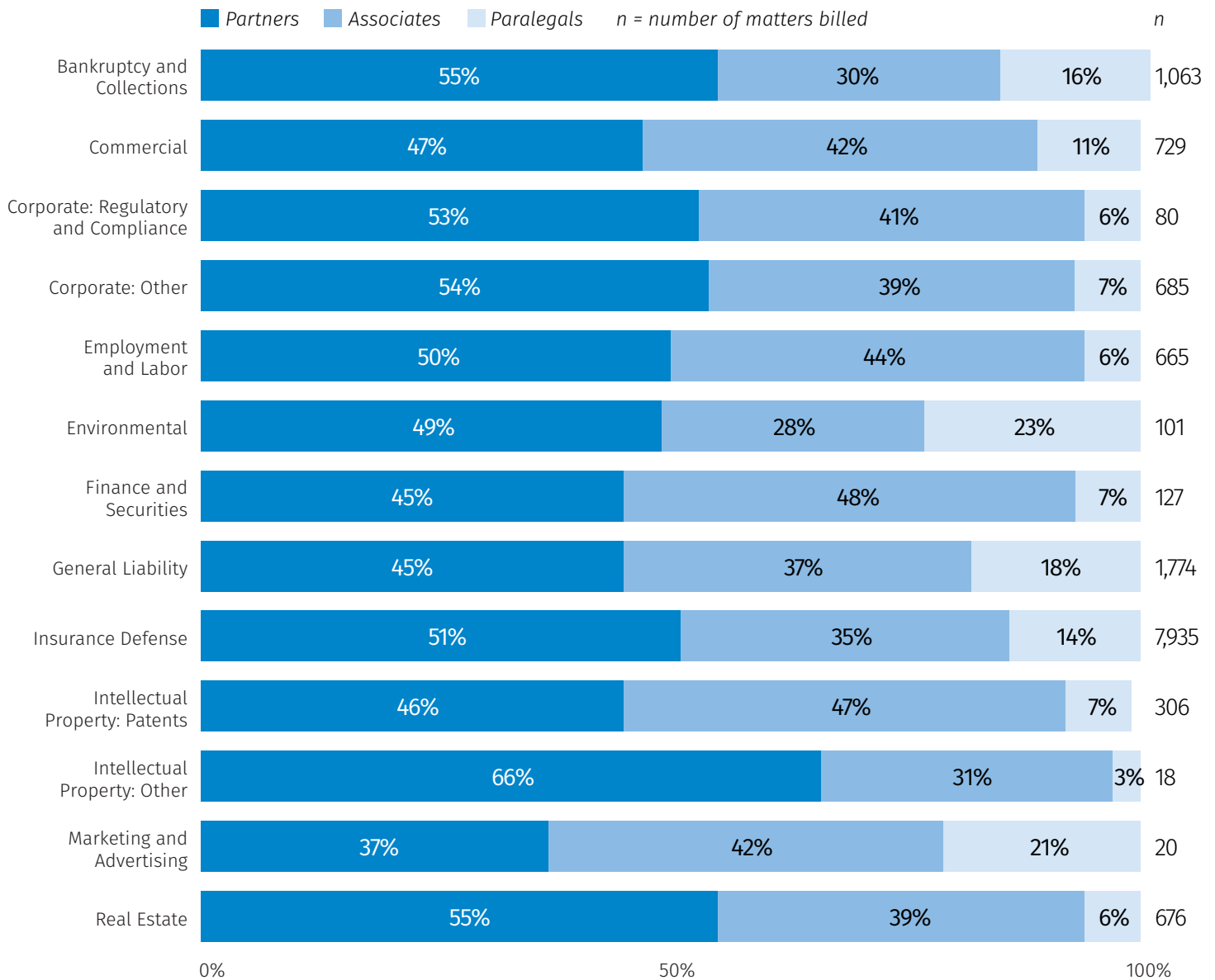
# Section VI: Matter Staffing Analysis



## Section VI: Matter Staffing Analysis

### Short Litigation Matters, 40 to 100 Total Hours Billed

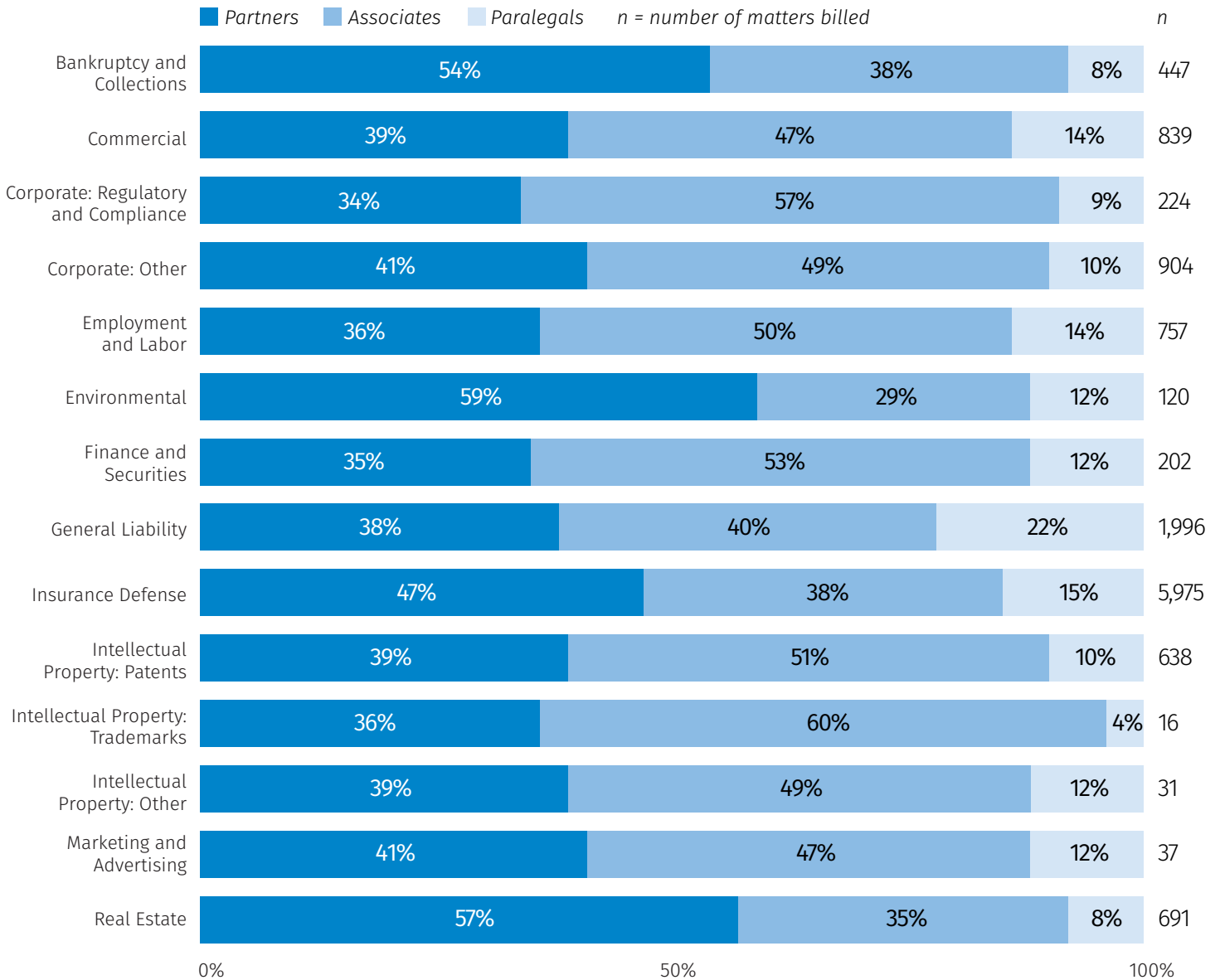
2017 to 2019 -- Percentage of Hours Billed per Matter



## Section VI: Matter Staffing Analysis

### Long Litigation Matters, More Than 100 Total Hours Billed

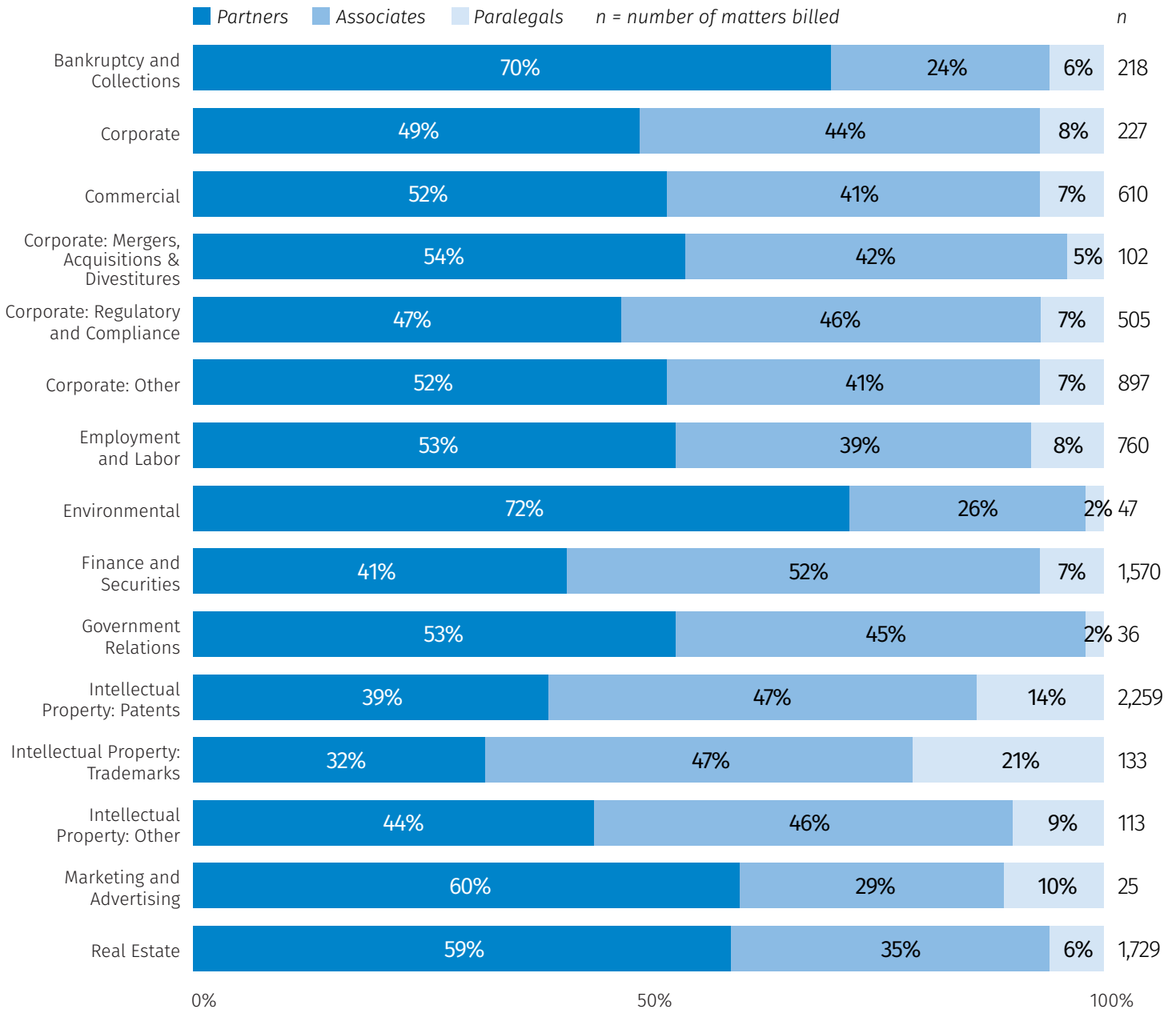
2017 to 2019 -- Percentage of Hours Billed per Matter



## Section VI: Matter Staffing Analysis

### Short Non-Litigation Matters, 40 to 100 Total Hours Billed

2017 to 2019 -- Percentage of Hours Billed per Matter

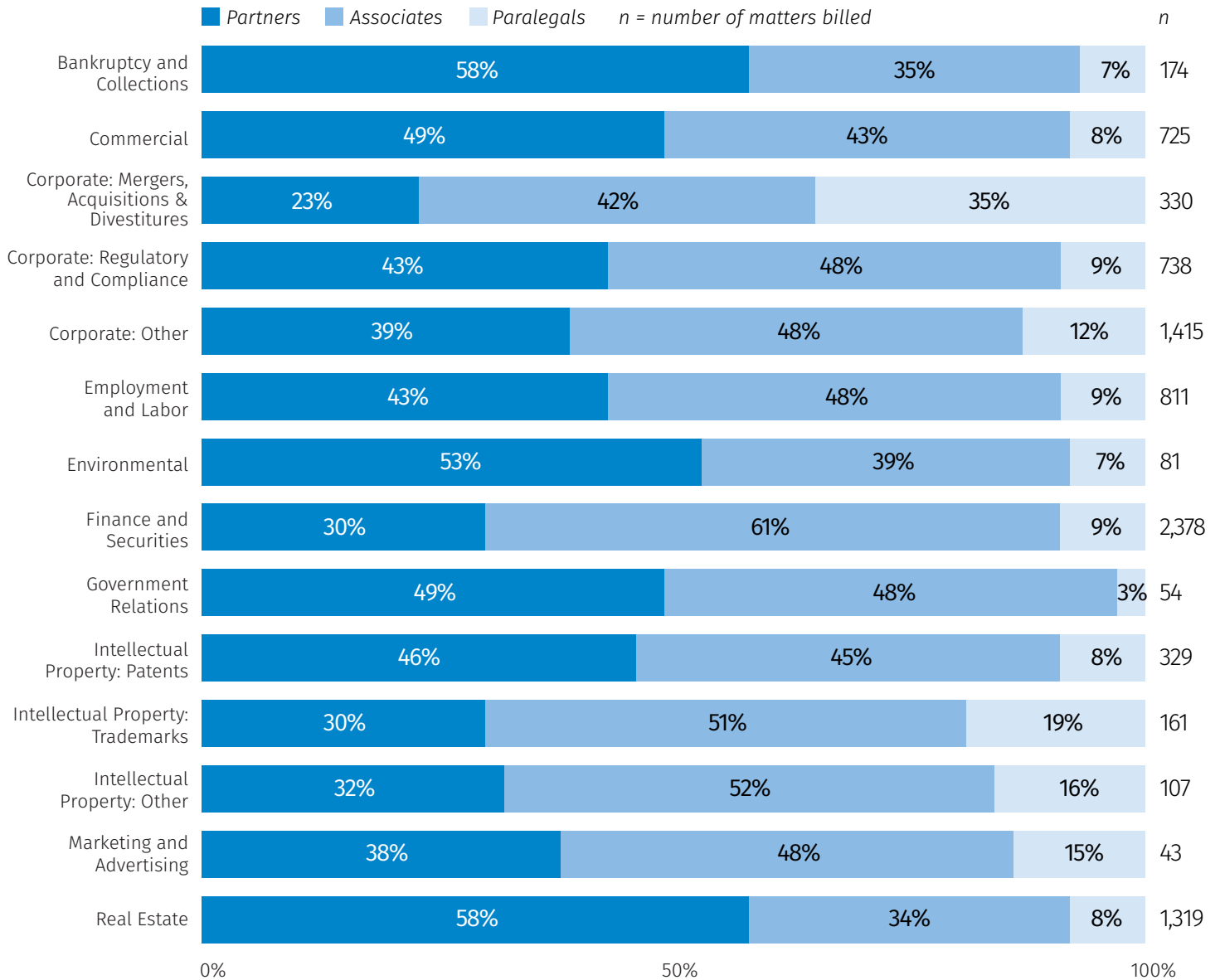




## Section VI: Matter Staffing Analysis

### Long Non-Litigation Matters, More Than 100 Total Hours Billed

2017 to 2019 -- Percentage of Hours Billed per Matter



# Appendix: Data Methodology



2020 Real Rate Report

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## Appendix: Data Methodology

### Invoice Information

Data in Wolters Kluwer's ELM Solutions reference database and in the 2020 Real Rate Report were taken from invoice line item entries contained in invoices received and approved by participating companies.

Invoice data were received in the Legal Electronic Data Exchange Standard (LEDES) format (LEDES.org). The following information was extracted from those invoices and their line items:

- Law firm (which exists as a random number in the ELM Solutions reference database)
- Timekeeper ID (which exists as a random number in the ELM Solutions reference database)
- Matter ID (which exists as a random number in the ELM Solutions reference database)
- Timekeeper's position (role) within the law firm (partner, associate, paralegal, etc.)
- Uniform Task-Based Management System Code Set, Task Codes, and Activity Codes (UTBMS.com)
- Date of service
- Hours billed
- Hourly rate billed
- Fees billed

### Non-Invoice Information

To capture practice area details, the matter ID within each invoice was associated with matter profiles containing areas of work in the systems of each company. The areas of work were then systematically categorized into legal practice areas. Normalization of practice areas was done based on company mappings to system-level practice areas available in the ELM Solutions system and by naming convention.

The majority of analyses included in this report have been mapped to one of 12 practice areas, further divided into sub-areas and litigation/non-litigation (for more information on practice areas and sub-areas, please refer to pages 164-166).

To capture location and jurisdiction details, law firms and timekeepers were systematically mapped to the existing profiles within ELM Solutions systems, as well as with publicly available data sources for further validation and normalization. Where city location information is provided, it includes any address within that city's defined Core-Based Statistical Area (CBSA) as defined by the Office of Management and Budget (OMB). The CBSAs are urban centers with populations of 10,000 or more and include all adjacent counties that are economically integrated with that urban center.

Where the analyses focus on partners, associates, and paralegals, the underlying data occasionally included some sub-roles, such as "senior partner" or "junior associate." In such instances, those timekeeper sub-roles were placed within the broader partner, associate, and paralegal segments.

Demographics regarding law firm size, location, and lawyer years of experience were augmented by incorporating publicly available information.

## Appendix: Data Methodology

### A Note on US Cities

Throughout the report, we have used city names to refer to CBSA and consistently used the principal city in the CBSA to refer to the entire area. The following are the shorthand city names used in this report and the corresponding CBSA designations, as defined by the OMB.

Principal City	CBSA Name
Akron, OH	Akron, OH
Albany, NY	Albany-Schenectady-Troy, NY
Albuquerque, NM	Albuquerque, NM
Atlanta, GA	Atlanta-Sandy Springs-Alpharetta, GA
Atlantic City, NJ	Atlantic City-Hammonton, NJ
Austin, TX	Austin-Round Rock-Georgetown, TX
Baltimore, MD	Baltimore-Columbia-Towson, MD
Baton Rouge, LA	Baton Rouge, LA
Birmingham, AL	Birmingham-Hoover, AL
Boise City, ID	Boise City, ID
Boston, MA	Boston-Cambridge-Newton, MA-NH
Bridgeport, CT	Bridgeport-Stamford-Norwalk, CT
Buffalo, NY	Buffalo-Cheektowaga, NY
Burlington, VT	Burlington-South Burlington, VT
Charleston, SC	Charleston-North Charleston, SC
Charleston, WV	Charleston, WV
Charlotte, NC	Charlotte-Concord-Gastonia, NC-SC
Chicago, IL	Chicago-Naperville-Elgin, IL-IN-WI
Cincinnati, OH	Cincinnati, OH-KY-IN
Cleveland, OH	Cleveland-Elyria, OH
Columbia, SC	Columbia, SC
Columbus, OH	Columbus, OH
Dallas, TX	Dallas-Fort Worth-Arlington, TX
Dayton, OH	Dayton-Kettering, OH
Denver, CO	Denver-Aurora-Lakewood, CO
Des Moines, IA	Des Moines-West Des Moines, IA
Detroit, MI	Detroit-Warren-Dearborn, MI
Fresno, CA	Fresno, CA
Grand Rapids, MI	Grand Rapids-Kentwood, MI
Greenville, SC	Greenville-Anderson, SC
Harrisburg, PA	Harrisburg-Carlisle, PA
Hartford, CT	Hartford-East Hartford-Middletown, CT

## Appendix: Data Methodology

### A Note on US Cities

Principal City	CBSA Name
Honolulu, HI	Urban Honolulu HI
Houston, TX	Houston-The Woodlands-Sugar Land, TX
Indianapolis, IN	Indianapolis-Carmel-Anderson, IN
Jackson, MS	Jackson, MS
Jacksonville, FL	Jacksonville, FL
Kansas City, MO	Kansas City, MO-KS
Knoxville, TN	Knoxville, TN
Lafayette, LA	Lafayette, LA
Las Vegas, NV	Las Vegas-Henderson-Paradise, NV
Lexington, KY	Lexington-Fayette, KY
Little Rock, AR	Little Rock-North Little Rock-Conway, AR
Los Angeles, CA	Los Angeles-Long Beach-Anaheim, CA
Louisville, KY	Louisville/Jefferson County, KY-IN
Madison, WI	Madison, WI
Miami, FL	Miami-Fort Lauderdale-Pompano Beach, FL
Milwaukee, WI	Milwaukee-Waukesha, WI
Minneapolis, MN	Minneapolis-St. Paul-Bloomington, MN-WI
Nashville, TN	Nashville-Davidson-Murfreesboro-Franklin, TN
New Haven, CT	New Haven-Milford, CT
New Orleans, LA	New Orleans-Metairie, LA
New York, NY	New York-Newark-Jersey City, NY-NJ-PA
Oklahoma City, OK	Oklahoma City, OK
Omaha, NE	Omaha-Council Bluffs, NE-IA
Orlando, FL	Orlando-Kissimmee-Sanford, FL
Philadelphia, PA	Philadelphia-Camden-Wilmington, PA-NJ-DE-MD
Phoenix, AZ	Phoenix-Mesa-Chandler, AZ
Pittsburgh, PA	Pittsburgh, PA
Portland, ME	Portland-South Portland, ME
Portland, OR	Portland-Vancouver-Hillsboro, OR-WA
Providence, RI	Providence-Warwick, RI-MA
Raleigh, NC	Raleigh-Cary, NC
Richmond, VA	Richmond, VA
Rochester, NY	Rochester, NY
Sacramento, CA	Sacramento-Roseville-Folsom, CA

## Appendix: Data Methodology

### A Note on US Cities

Principal City	CBSA Name
Salt Lake City, UT	Salt Lake City, UT
San Diego, CA	San Diego-Chula Vista-Carlsbad, CA
San Francisco, CA	San Francisco-Oakland-Berkeley, CA
San Jose, CA	San Jose-Sunnyvale-Santa Clara, CA
San Juan, PR	San Juan-Bayamon-Caguas, PR
Savannah, GA	Savannah, GA
Seattle, WA	Seattle-Tacoma-Bellevue, WA
St. Louis, MO	St. Louis, MO-IL
Syracuse, NY	Syracuse, NY
Tallahassee, FL	Tallahassee, FL
Tampa, FL	Tampa-St. Petersburg-Clearwater, FL
Toledo, OH	Toledo, OH
Trenton, NJ	Trenton-Princeton, NJ
Tulsa, OK	Tulsa, OK
Virginia Beach, VA	Virginia Beach-Norfolk-Newport News, VA-NC
Washington, DC	Washington-Arlington-Alexandria, DC-VA-MD-WV
Wheeling, WV	Wheeling, WV-OH

## Appendix: Data Methodology

### Anonymization of the Dataset

Prior to inclusion in the ELM Solutions reference database, we systematically scrubbed the data of any information that would identify a particular matter, company, law firm, invoice, or timekeeper (individual). To ensure relationships necessary for analysis, those variables were assigned randomly generated numbers. To maintain data integrity and allow for proper analysis, these numbers are linked across data tables to enforce their associations.

To further ensure anonymity and confidentiality:

- The information is published in such a manner as to make it reasonably impervious to reverse analysis should some attempt be made to determine what data might pertain to any company, law firm, timekeeper, invoice, or matter;
- The 2020 Real Rate Report will not reveal which ELM Solutions client or clients are included or excluded in its analyses;
- Clients are not and will not be informed as to whether their data are included within a particular facet of analysis; and
- No textual description of any legal work performed by any individual exists in the ELM Solutions reference database.

### A Note on Insurance Litigation

Our aim is to provide a point of comparison for companies purchasing law firm services. To improve comparability, we removed data related to insurance company defense litigation for all analyses unless noted otherwise. Insurance litigation tends to be less expensive than other types of litigation, as it is typically more repetitive and less complex.

### “Real Rate” Definition

The information in this report consists of data taken from client invoices submitted by law firms for work performed from 1/1/2017 through 12/31/2019. All Invoices were submitted through the ELM billing systems.

The analyses contained in this report are derived from aggregating hours, fees, and rates submitted as line items on those invoices. For a line item to qualify for inclusion in this report, it had to undergo multiple and rigorous testing processes to ensure its validity.

For example, for a rate to be loaded to the ELM Solutions reference database and used in this report, it must have been part of an invoice line entry in which all of the following items were included:

- Name of the biller
- Role of the biller
- Date of activity
- Hourly rate charged
- Time charged
- UTBMS code associated with the time charged
- Total amount charged for the activity

In addition, each line item’s hourly rate was validated against its “real rate” (calculated by dividing the total amount charged for the activity by the time charged). Any line items with an hourly rate that did not align closely with the real rate were not loaded to the reference database.

Real Rate = Line Item Total/Line Item Hours (Units) Example: \$4,000/10 Hours = Real Rate of \$400

Adjustments the client made to line item amounts subsequent to submission are not factored into the dataset. These types of adjustments may impact the effective rate paid by the client to the law firm but do not reflect the real rate billed.

## Appendix: Data Methodology

In short, the real rate is the rate appearing on an approved invoice at the invoice line item level.

Aggregations of data taken from millions of these line item-level invoice entries are the core of the information analyzed.

### A Note on Negotiated Rates and Billing

Practices law firms can generally follow vary for submitting “negotiated” rates on invoices. Firms may submit the negotiated rate as the hourly rate identified on the invoice line item, insert a vendor line item adjustment to ensure compliance, or provide a vendor invoice level adjustment to bring the total amount of the fees into compliance with agreed-on discounts. Although the former two are considered part of the real rate calculation, the latter can be problematic. It is not directly linked to a line item, and therefore, for the purposes of determining the rate, it should not be assumed that the adjustment is related to a specific line item. Invoice-level adjustments may represent a credit or some other type of adjustment placed on the invoice. To ensure these types of adjustments would not adversely impact the analysis contained within the 2020 Real Rate Report, the team reviewed the population of invoices and line items to determine what the deviation of the real rate might be based on inclusion or exclusion. The analysis demonstrated that the variance was not significant (less than 1%).

As such, we decided not to include the vendor-level adjustments in the report.

### Types of Matters Included in the Analysis

Matters within the ELM Solutions system are associated with areas of work described and defined by ELM Solutions clients. Those areas of work were analyzed and systematically categorized into legal practice areas. Normalization of practice areas was supported by mappings to system-level practice areas available in the ELM Solutions system and by naming convention.

All data included within this report have been mapped to a corresponding practice area. The majority of our analyses focus on the following 12 practice areas:

- Bankruptcy and Collections
- Commercial
- Corporate
- Employment and Labor
- Environmental
- Finance and Securities
- General Liability
- Government Relations
- Insurance Defense
- Intellectual Property
- Marketing and Advertising
- Real Estate

Within each client’s areas of work, sub-areas are often identified. The lists that follow identify client areas of work and, within those areas, the sub-areas underneath each practice area. Often, the same sub-area appears within different practice areas. For example, the sub-area “General/Other” when listed under “Commercial and Contracts” refers to general work provided regarding Commercial and Contracts matters. When listed under the “Employment and Labor” practice area, the same sub-area refers to work provided on Employment and Labor. Where applicable and practicable, each area and sub-area has been further subdivided into litigation and non- litigation work for the purposes of granular analysis.

### Bankruptcy and Collections

Chapter 11  
Collections  
General/Other  
Workouts and Restructuring



## Appendix: Data Methodology

### Commercial (Commercial Transactions and Agreements)

Contract Breach or Dispute  
General, Drafting, and Review  
General/Other

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### Corporate<sup>1</sup>

Antitrust and Competition  
Corporate Development  
General/Other  
Governance  
Information and Technology  
Mergers, Acquisitions, and Divestitures

Partnerships and Joint Ventures  
Regulatory and Compliance  
Strategic Asset Management  
Tax  
Treasury  
White Collar/Fraud/Abuse

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### Employment and Labor

ADA  
Agreements  
Compensation and Benefits  
Discrimination, Retaliation, and Harassment/EEO  
Employee Dishonesty/Misconduct  
ERISA

General/Other  
Immigration  
OFCCP  
Union Relations and Negotiations/NLRB  
Wages, Tips, and Overtime  
Wrongful Termination

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### Environmental

General/Other  
Health and Safety  
Permits  
Superfund  
Waste/Remediation

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### Finance and Securities

Commercial Loans and Financing  
Debt/Equity Offerings  
Fiduciary Services  
General/Other

Investments and Other Financial Instruments  
Loans and Financing  
SEC Filings and Financial Reporting  
Securities and Banking Regulations

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### General Liability

Asbestos/Mesothelioma  
Auto and Transportation  
Consumer Related Claims  
Crime, Dishonesty and Fraud  
General/Other

Personal Injury/Wrongful Death  
Premises  
Product and Product Liability  
Property Damage  
Toxic Tort

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### Government Relations

General/Other  
Lobbying and Relations

<sup>1</sup> All references to "Corporate: General/Other" in the 2020 Real Rate Report are the aggregation of all Corporate subareas excluding the Mergers, Acquisitions, and Divestitures sub-area and the Regulatory and Compliance sub-area.

## Appendix: Data Methodology

### Insurance Defense

Asbestos/Mesothelioma  
Auto and Transportation  
Errors and Omissions  
General/Other  
Personal Injury/Wrongful Death  
Product and Product Liability  
Professional Liability  
Property Damage  
Toxic Tort

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### Intellectual Property<sup>2</sup>

Copyrights  
General/Other  
Licensing  
Patents  
Trademarks

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### Marketing and Advertising

General/Other

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### Real Estate

Commercial  
Construction/Development  
Easement and Right of Way  
General/Other  
Land Use/Zoning/Restrictive Covenants  
Landlord/Tenant Issues  
Leasing  
Property/Land Acquisition or Disposition  
Titles

<sup>2</sup> All references to "Intellectual Property: General/Other" in the 2020 Real Rate Report are the aggregation of all Intellectual Property sub-areas excluding the Patents and Trademarks sub-areas.

## About Wolters Kluwer's ELM Solutions

Wolters Kluwer's ELM Solutions is the market-leading global provider of enterprise legal spend and matter management, contract lifecycle management, and legal analytics solutions. We provide a comprehensive suite of tools that address the growing needs of corporate legal operations departments to increase operational efficiency and reduce costs. Corporate legal and insurance claims departments trust our innovative technology and end-to-end customer experience to drive world-class business outcomes. Wolters Kluwer's ELM Solutions was named a leader in both the IDC MarketScape: Worldwide Enterprise Legal Spend Management 2020 Vendor Assessment and IDC MarketScape: Worldwide Enterprise Matter Management 2020 Vendor Assessment. The award-winning products include Passport®, the highest-rated ELM solution in the latest Hyperion MarketView™ Legal Market Intelligence Report; TyMetrix® 360°, the industry's leading SaaS-based e-billing and matter management solution; CLM Matrix, named a "strong performer" in the 2019 Q1 CLM Forrester Wave report; and the LegalVIEW® portfolio of legal analytics solutions based upon the industry's largest and most comprehensive legal spend database, with more than \$140 billion in invoices.

# **EXHIBIT 7**

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

MOLLY CRANE, Individually and on  
Behalf of All Other Persons Similarly  
Situating,

Plaintiff,

v.

SEXY HAIR CONCEPTS, LLC, and ULTA  
SALON COSMETICS & FRAGRANCE,  
INC.,

Defendants.

Case 1:17-cv-10300

**DECLARATION OF PATRICK J. VALLEY  
IN SUPPORT OF PLAINTIFF'S ASSENTED-TO MOTION  
FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

I, Patrick J. Vallely, declare under penalty of perjury:

1. I am attorney with the law firm Shapiro Haber & Urmy LLP ("Shapiro Haber & Urmy"), counsel to Plaintiff in this action.

2. I submit this declaration in support of Plaintiff's Motion for Final Approval of Class Action Settlement (the "Motion").

3. The defined terms I use in this declaration have the meanings provided in the Settlement Agreement and Release attached to the Motion as Exhibit A.

4. On May 30, 2018 and July 23, 2018, the parties engaged in a formal mediation before an experienced and respected mediator and retired judge, the Honorable John C. Cratsley. The first mediation session was unsuccessful, and only after a full second day of mediation were the Parties able to reach an agreement on the core terms of the Settlement. Even after that, the Parties negotiated vigorously concerning additional terms of the Settlement.

5. My firm took discovery in this action to inform ourselves concerning the value of the case and to assess the benefits of a Settlement. The core facts supporting Plaintiff's claim derived from the product labels themselves, but, in order to intelligently discuss settlement, my firm procured from Defendants before agreeing to mediation information concerning the volumes of sales of the Subject Products and other information concerning those sales (including wholesale and retail price information). Defendants also produced additional information to Plaintiff concerning Defendants' defenses, which permitted my firm to consider fully the risks associated with pressing forward with Plaintiff's claims. In whole, we obtained the necessary information in order to fully evaluate the risks and benefits of the Action before negotiating the Settlement.

6. My firm is highly experienced in class action litigation, specializing in particular in consumer class actions. The attorneys of record (myself and Edward F. Haber) together have dozens of years' experience litigating such actions. I attached hereto as **Exhibit 1** a resume detailing my firms' relevant experience in class actions, including consumer class actions.

7. Based on my firm's knowledge and understanding to evaluate the risks and the benefits of the proposed settlement, we strongly believe that the proposed settlement confers a significant benefit to Class Members. Furthermore, my firm conducted an analysis of class action settlements in cases involving similar allegations (for example, concerning misrepresentations on labels of consumer products). Based on that evaluation, and considering not only the aggregate value of the Settlement but also the structural aspects of the Settlement that will encourage and facilitate claim submission, we have concluded that this Settlement presents a highly favorable recovery for the Class.

8. The following schedule sets forth the amount of time spent by the attorneys and paralegals at my firm in prosecuting this action on behalf of the Plaintiff and the Class through February 15, 2019. The schedule also sets forth the current hourly rates of each of those attorneys and paralegals or the rates that would be charged for those professionals if they were still employed by Shapiro Haber & Urmey LLP. This schedule was prepared from contemporaneous daily time records maintained by my firm in the ordinary course, which can and will be provided to the Court if requested:

<u>Name</u>	<u>Position</u>	<u>Rate</u>	<u>Hours</u>	<u>Lodestar</u>
Edward F. Haber	Senior Partner	\$925.00	39.8	\$36,815.00
Thomas G. Shapiro	Counsel <sup>1</sup>	\$925.00	19.7	\$18,222.50
Thomas V. Urmey	Counsel	\$925.00	1.8	\$1,665.00
Ian J. McLoughlin	Partner	\$720.00	22.6	\$16,272.00
Michelle H. Blauner	Partner	\$820.00	0.4	\$328.00
Adam M. Stewart	Senior Associate	\$575.00	3.3	\$1,897.50
Patrick J. Valley	Senior Associate	\$575.00	405.3	\$233,047.50
Jonathan Dinerstein	Associate	\$350.00	1.3	\$455.00
Robert Erickson	Paralegal	\$225.00	1.5	\$337.50
Tyler Jankauskas	Paralegal	\$225.00	14.4	\$3,240.00
Tyler Purinton	Paralegal	\$225.00	16.7	\$3,757.50
		<b>Total</b>		<b>\$316,037.50</b>

9. The hourly rates set forth above are within the range of rates customarily charged by attorneys practicing complex litigation in the Boston area. Had my firm not prosecuted this action, my firm could and would have devoted the time described above to other cases. The

<sup>1</sup> At the time Thomas G. Shapiro and Thomas V. Urmey performed work in this case, they were Senior Partners.

major commitment of time that my firm devoted to this case precluded us from spending that time working on other cases and accepting other representations.

10. Through March 13, 2017, my firm has incurred or will incur \$6,482.45 in out-of-pocket costs and expenses in the prosecution of the case. The most significant item among these expenses is my firm’s \$3,948.00 share of the expenses paid to Judge Cratsley, who successfully mediated this case. All the costs and expenses summarized below were reasonably and necessarily incurred in connection with the prosecution and settlement of this action and were recorded in the books and records maintained by my firm in the ordinary course. A breakdown of those expenses by category follows. This summary was prepared from detailed expense records of my firm, and from the estimate for settlement administration expenses provided by the Settlement Administrator, which can and will be produced to the Court if requests:

<u>Category</u>	<u>Expense</u>
Delivery	\$103.71
Filing Fee	\$400.00
Mediation Expense	\$3,948.00
Printing/Copies	\$935.70
Postage	\$8.45
Legal Research	\$955.28
Telephone Conference	\$59.31
Travel	\$72.00
<b>Total</b>	<b>\$6,482.45</b>

11. Plaintiff is seeking a service award for her assistance in and time devoted to this case. Although this case was settled at a relatively early stage, Ms. Crane’s assistance in this litigation was important. Specifically, Ms. Crane assisted in the investigation of this case,



responded to written discovery (including detailed interrogatories and the collection of documents), and assisted Class Counsel in the consideration of the Settlement.

Signed under penalties of perjury on February 19, 2019.

/s/ Patrick J. Vallely  
Patrick J. Vallely

**CERTIFICATE OF SERVICE**

I hereby certify that the above and foregoing pleading was filed electronically through the Court's electronic filing system and that notice of this filing will be sent to all counsel of record in this matter by operation of the Court's ECF system.

Dated: February 19, 2019

*/s/ Patrick J. Vallely* \_\_\_\_\_  
Patrick J. Vallely

**Exhibit 1**

## Shapiro Haber & Urmy LLP

### OVERVIEW

With over 30 years of experience litigating, trying, and winning multi-million dollar cases across the country, Shapiro Haber & Urmy LLP (“Shapiro Haber & Urmy”) has long been a national leader in the field of complex, high-stakes litigation. Each of our attorneys has the educational background, expertise, and creativity to litigate against the largest, most prominent law firms in the country – and win. Unlike many other law firms in which only a few, if any, of the lawyers have actually tried a case to conclusion, our lawyers have successfully tried dozens of cases to verdict, including complex securities fraud actions, and have obtained outstanding results for our clients when efforts to reach a negotiated settlement have failed. As a result, we approach each case – large or small – with the expectation that it may be tried, and with the rigor and attention to detail that excellent trial preparation requires.

Shapiro Haber & Urmy’s partner, Edward F. Haber, and Counsel Thomas V. Urmy, Jr., and Thomas G. Shapiro were named Massachusetts Super Lawyers in 2006 through 2017, and were recognized as Top Rated Litigators by *The American Lawyer* in 2016. Michelle H. Blauner was named a Massachusetts Super Lawyer in 2006 through 2017. Associate Adam M. Stewart was named a Massachusetts Rising Star in 2011 through 2017, and associate Patrick J. Valley was named a Massachusetts Rising Star in 2013 through 2017. The firm has been awarded the “AV” rating by the Martindale-Hubbell Law Directory, which is given only to those firms that have earned a very high measure of professional esteem and have adhered to the highest ethical standards in the legal profession.

Shapiro Haber & Urmy’s commitment to success in high-stakes, high-profile litigation is matched by its commitment to providing access to quality legal representation on a pro bono or reduced-fee basis to low-wage individuals who otherwise might not be able to afford legal help. Our attorneys have represented low-wage workers in the fields of hospitality, janitorial services, and retail, in actions seeking to recover unpaid wages ranging from hundreds to tens of thousands of dollars. In each of these smaller cases we incur large fees and expenses, often far in excess of the wages sought to be recovered.

It is our belief that part of our duty as members of the bar is to represent those who otherwise would not have any means to obtain relief in court, and we welcome that responsibility. Reflecting this commitment, in 2011 the firm received the Law Firm Award from the Political Asylum/Immigration Representation Project (PAIR) for its pro bono work in representing asylum seekers.

## LEGAL PROFESSIONALS

### PARTNERS

#### **Edward F. Haber, Partner**

- 1966, B.A., Cornell University
- 1969, J.D. *cum laude*, Harvard Law School

#### **Michelle H. Blauner, Partner**

- 1983, B.A. *with highest distinction*, Cornell University
- 1986, J.D. *cum laude*, Harvard Law School

### ASSOCIATES

#### **Adam M. Stewart, Associate**

- 2001, B.S. *magna cum laude*, Northeastern University
- 2004, J.D. *magna cum laude*, Suffolk University Law School
- 2004-2005, law clerk for the Justices of the Massachusetts Superior Court

#### **Patrick J. Vallely, Associate**

- 2002, B.A. *magna cum laude*, University of Dayton
- 2005, J.D. *with honors*, University of Chicago Law School

#### **Jonathan F. Dinerstein, Associate**

- 2009, B.A., Tufts University
- 2016, J.D. *magna cum laude*, Boston University School of Law

### COUNSEL

#### **Thomas V. Urmv, Jr., Partner**

- 1960, B.A. *cum laude*, Amherst College
- 1964, L.L.B., Yale Law School

#### **Thomas G. Shapiro, Partner**

- 1965, B.A. *magna cum laude*, Harvard College
- 1969, J.D. *cum laude*, Harvard Law School

## JUDICIAL RECOGNITION

- Shapiro Haber & Urmy litigated the case “with considerable skill and experience” and demonstrated “excellent lawyering.” *Richard v. State St. Corp.*, (D. Mass. 2014).
- Shapiro Haber & Urmy is “highly skilled” and has “significant class action experience.” *Arnett v. Bank of Am., N.A.*, 2014 U.S. Dist. LEXIS 130903, at \*38 (D. Or. Sep. 18, 2014).
- “Shapiro Haber & Urmy is an eleven-lawyer firm with a national reputation for litigating a variety of national class actions” *Davis v. Footbridge Eng’g Servs., LLC*, 2011 U.S. Dist. LEXIS 93645, at \*8 (D. Mass. Aug. 22, 2011)
- “I think that [Shapiro Haber & Urmy] has done an excellent job on this and makes my job much, much easier.” *Olmeda v. AM Broadband, LLC*, (D. Mass. 2009) (Final Approval Hearing, Oct. 14, 2009).
- “[Shapiro Haber & Urmy] have wide experience in the field of securities class litigation [and] ... counsels’ skillful and zealous representation over a six-year period enabled the settling classes to obtain a favorable and certain cash recovery. . . . The high quality of representation provided by [Shapiro Haber & Urmy] is evident from the extensive record of this case . . . .” *In re Merrill Lynch & Co., Inc. Research Reports Securities Litig.*, 246 F.R.D. 156, 164, 174 (S.D.N.Y. 2007).
- Shapiro Haber & Urmy “has broad-based experience in complex litigation, including experience in securities fraud class actions in this district and others.” *Swack v. Credit Suisse First Boston*, 230 F.R.D. 250, 267 (D. Mass. 2005).
- “I am satisfied that [Shapiro Haber & Urmy] will prosecute this action vigorously and will protect the interests of the absent class members.” *McLaughlin v. Liberty Mutual Ins. Co.*, 224 F.R.D. 304, 310 (D. Mass. 2004).
- Shapiro Haber & Urmy is “highly qualified both generally, and in the specific context of private class actions under the Federal securities laws.” *Coopersmith, et al. v. Lehman Brothers, Inc.*, 344 F. Supp. 2d 783, 784 (D. Mass. 2004).
- Shapiro Haber & Urmy is “highly qualified to act as lead counsel for the Class” and “has extensive experience in prosecuting class actions, including as lead counsel.” *US Trust Co. of NY v. Albert* (S.D.N.Y. 1995).
- Shapiro Haber & Urmy “comes with a wealth of experience and skill in prosecuting class actions.” *US West, Inc., et al. v. Macallister, et al.*, Fed. Sec. L. Rep. P 97, 269 (D. Colo. 1992).

## QUALIFICATIONS AND EXPERIENCE

Highlights of Shapiro Haber & Urmy's class action experience include the following:

### ANTITRUST LITIGATION

- Shapiro Haber & Urmy played a leading role as a member of the Plaintiffs' Steering Committee in *In re Plasma Derivative Protein Therapies Antitrust Litig.*, C.A. No. 09-cv-07666 (N.D. Ill.), successfully defeating three lengthy and substantial motions to dismiss in that case. This was a complex, nationwide putative class action against manufacturers of plasma protein derivative therapies, which are proteins used to treat seriously ill patients across the United States. The action, filed on behalf of all direct purchasers of plasma-derivative protein therapies, alleged that plasma manufacturers agreed to restrict supply and therefore increase prices. In deciding to appoint the firm to its leadership position, the Court highlighted Shapiro Haber & Urmy's extensive experience litigating complex class actions. The case recently settled for \$128 million.
- Shapiro Haber & Urmy represented several of the nation's largest bedding manufacturers and licensors as plaintiffs in *In re Polyurethane Foam Antitrust Litig.*, C.A. No. 10-md-02196 (N.D. Ohio). Plaintiffs alleged that Defendants and their co-conspirators contracted, combined, or conspired to fix, raise, maintain, and/or stabilize prices and allocate customers for polyurethane foam in the United States.
- Shapiro Haber & Urmy is part of the Executive Committee in *In Re: Nexium (Esomeprazole) Antitrust Litig.*, C.A. No. 12-md-02409 (D. Mass.), representing a putative class of consumers and third-party payors who purchased or paid for Nexium products. Plaintiffs allege that Defendants conspired and entered into anticompetitive agreements designed to shield Defendant AstraZeneca and its brand name drug, Nexium, from competition with generic, lower priced versions of the drug.
- Shapiro Haber & Urmy has assisted in the representation of a certified class of dairy farmers in the Northeastern United States who allege that the defendants unlawfully monopolized and fixed the prices that they paid dairy farmers for their milk, and unlawfully allocated markets. The defendants included Dairy Farmers of America, Inc., Dairy Marketing Services, LLC, and Dean Foods Company. The Court approved a settlement between Plaintiffs and Defendant Dean Foods Company that provided for \$30 million in settlement funds. The case is *Allen v. Dairy Farmers of America, Inc., et al.*, C.A. No. 09-cv-230 (D. Vt.).
- In *In re: Automotive Parts Antitrust Litig.*, Master File No. 12-md-02311 (E.D. Mich.), Shapiro Haber & Urmy represents a putative class of indirect purchasers of various auto parts. The action alleges that Defendants fixed and maintained the prices at which such parts were sold.

- In *In re Optical Disk Drive Products Antitrust Litig.*, C.A. No. 10-md-2143 (N.D. Cal.), Shapiro Haber & Urmy represents purchasers of optical disc drives, as well as products containing optical disc drives, including DVD players, computers, and other electronic devices. The action alleges that Defendants and their co-conspirators fixed and maintained an artificial price at which optical disc drives, as well as products containing optical disc drives, were sold in the United States.
- Shapiro Haber & Urmy was appointed Vice Chair of the Executive Committee representing the class of direct purchasers in *In re Marine Products Antitrust Litig.*, C.A. No. 10-cv-2319 (C.D. Cal.) (continuing as *Ace Marine Rigging & Supply, Inc. v. Virginia Harbor Services, Inc., et al.*, C.A. No. 11-cv-00436 (C.D. Cal) and *Board of Commissions of the Port of New Orleans v. Virginia Harbor Services, Inc., et al.*, C.A. No. 11-cv-004367 (C.D. Cal)). The firm represented a class of direct purchasers of several products used in the marine industry to protect vessels, docks, and piers. The class action alleged that manufacturers of these marine products collaborated to rig bids and divide the market in order to avoid competition and maximize profits.

### CONSUMER LITIGATION

- Shapiro Haber & Urmy represents plaintiffs in a class action lawsuit filed in the Superior Court for Suffolk County, No. 98-6002-H, against Philip Morris Companies, Inc. and Philip Morris, Inc. The suit is brought under the Massachusetts Consumer Protection Act, M.G.L. c. 93A, and the common law, and seeks to recover damages from the defendants on behalf of all persons who purchased Marlboro Light cigarettes in the Commonwealth of Massachusetts. The case alleges that by using words such as “Light” and “Lowered Tar and Nicotine” on the packaging of Marlboro Lights, defendants falsely represented to purchasers that the cigarettes contained and delivered lower levels of tar and nicotine to human smokers than did regular cigarettes. In October of 2001, the Superior Court certified the case as a class action. Shapiro Haber & Urmy successfully argued against defendants’ appeal from the class certification decision, which was affirmed by the Supreme Judicial Court in August of 2004, *Aspinall v. Philip Morris Companies, Inc.*, 442 Mass. 381 (2004). The firm also successfully prevailed, before both the Superior Court and the Supreme Judicial Court, against Philip Morris’ argument that a consumer’s claims under c. 93A were preempted by federal law and the actions of the Federal Trade Commission. The final decision is reported at 453 Mass. 431 (2009). On February 19, 2016, after a five-week trial, the Court found that Philip Morris committed the alleged c. 93A violations, and awarded statutory damages plus prejudgment interest, totaling \$15 million.
- Shapiro Haber & Urmy represented putative classes of plaintiffs in litigation throughout the United States charging Bank of America with breach of contract and breach of the covenant of good faith and fair dealing in connection with the purchase of hazard and flood insurance in excess of the coverage amounts required by the mortgage agreements. In two of those cases, *Kolbe v. Bank of America*, 695 F.3d 111



(1<sup>st</sup> Cir. 2012), *en banc review granted*, and *Lass v. Bank of America*, 695 F.3d 129 (1st Cir. 2012), the Court of Appeals for the First Circuit reversed the district court's orders dismissing the claims. Shapiro Haber & Urmy successfully settled the case for \$30 million.

- Shapiro Haber & Urmy represents the putative class of plaintiffs in litigation in federal and state court in Florida against Homeward Residential, Inc. for breach of the covenant of good faith and fair dealing, and unfair business practices associated with its force-placed hazard insurance practices. Shapiro Haber & Urmy defeated Homeward's efforts to dismiss the case. *Martorella v. Deutsche Bank Nat'l Trust Co.*, 2013 WL 1137514 (S.D. Fla. Mar. 18, 2013). The parties have entered into a settled the case for a refund of 12.5% of the force-placed insurance premiums, which was approved by the state court and is being administered.
- Shapiro Haber & Urmy represents a putative class in a lawsuit filed in the United States District Court for the District of Massachusetts, No. 15-cv-12864, against defendants Massachusetts Mutual Life Insurance Company and its subsidiary C.M. Life Insurance Company. The suit is brought under the Massachusetts Consumer Protection Act, M.G.L. c. 93A, and the common law, and seeks to recover damages from the defendants on behalf of persons who purchased defendants' "MassMutual Odyssey" Fixed Annuity Product (the "Annuity"). The case alleges that the defendants falsely advertised and sold the Annuity to the plaintiff and class as providing a minimum guaranteed interest rate of 3%, but then unilaterally substituted a lower rate, which damaged plaintiff and the class because they received interest at a rate lower than the 3% rate that Defendants had promised.
- Shapiro Haber & Urmy also represents or has represented consumers and business owners by prosecuting consumer class action suits against:
  - MBTA on behalf of purchasers of commuter rail monthly passes in the months of January-March 2015 alleging breach of contract for failure to provide train service.
  - Seven Massachusetts automobile insurance companies for nonpayment of interest on arbitration awards;
  - Shell Vacation homes in connection with the sale of time shares
    - Starbucks for misrepresentation and overcharges in the sale of coffee;
  - Earth Friendly products for misrepresenting its products as "100% Natural" or "All Natural"
  - Building Products of Canada for selling defective roofing shingles;
  - Various health maintenance organizations for failure to pay claims of non-participating medical service providers for medical services in a timely fashion;
  - Zions First National Bank for charging and collecting excessive overdraft fees;
  - Re\$ubmiIt, LLC for unauthorized fees charged for insufficient funds checks;

- U-Haul for attempted price-fixing in violation of the Massachusetts consumer protection statute
- Wozo, LLC for deceptive internet marketing;
- American Medical Security, Inc. for unfair insurance practices;
- NVIDIA for the sale of defective products in violation of state consumer protection statutes
- Lenovo for the sale of defective products in violation of state consumer protection statutes
- TJX Companies, Inc. and Princeton Review related to the theft of personal and financial information of customers;
- E.I. DuPont De Nemours & Company for the potential of serious health hazards resulting from the manufacturing, sales and advertising of “Teflon”;
- Gillette for engaging in deceptive marketing practices with respect to its M3P razor and blades; and
- Southwestern Bell (doing business as Cellular One) for overcharging.

### CONSUMER LITIGATION APPEALS

Attorneys in our firm had principal responsibility for the brief, and presented the oral argument, in the following appeals in consumer class actions, many of which have asserted claims under M.G.L. c. 93A.

- *Kolbe v. BAC Home Loans Servicing, LP*, 695 F.3d 111 (1st Cir. 2012), vacated by *Kolbe v. BAC Home Loans Servicing, LP*, 738 F.3d 432 (1st Cir. 2013) (*en banc*).
- *Downing v. Globe Direct LLC*, 682 F.3d 18 (1st Cir. 2012)
- *Liu v. Amerco*, 677 F.3d 489 (1st Cir. 2012)
- *Aspinall v. Philip Morris, Inc.*, 453 Mass. 431 (2009)
- *Good v. Altria Group, Inc.*, 501 F.3d 29 (1st Cir. 2007), *aff'd* 129 S. Ct. 528 (2008)
- *Aspinall v. Philip Morris Cos., Inc.*, 442 Mass. 381 (2004)
- *Smilow v. Sw. Bell Mobile Sys., Inc.*, 323 F.3d 32 (1st Cir. 2003)
- *Roberts v. Enterprise Rent-A-Car Co. of Boston, Inc.*, 438 Mass. 187 (2002)

## SECURITIES LITIGATION

- Shapiro Haber & Urmy served as co-lead counsel prosecuting a class action on behalf of the sellers of Sigma Designs, Inc. stock from July 13, 2007 through November 28, 2007, alleging securities fraud and insider trading against Sonar Capital Management LLC and certain of its affiliated investment funds and investors and certain of its principals. *Gordon v. Sonar Capital Mgmt., Inc.* (S.D.N.Y.).
- Shapiro Haber & Urmy is liaison counsel prosecuting an action on behalf of the Federal Home Loan Bank of Boston (the “Bank”) in the United States District Court for the District of Massachusetts, arising from the sale to the Bank by numerous financial institutions of over \$5.9 billion in Private Label Mortgage-Backed Securities, by means of offering documents which Plaintiffs allege were materially false and misleading. The Bank seeks rescission and damages under M.G.L. c. 110A, M.G.L. c. 93, and applicable common law. *Fed. Home Loan Bank of Boston v. Ally Fin., et. al.* (D. Mass.). The case has recently been remanded to Massachusetts Superior Court.
- Shapiro Haber & Urmy was at the forefront of shareholder litigation addressing the nationwide epidemic of improperly backdated stock options. The firm was lead counsel or part of the leadership team in derivative actions in both state and federal courts concerning the improper backdating (or other manipulation) of stock options granted to officers, directors, and executives of the following corporations: Affiliated Computer Services, Inc.; Cablevision Systems Corp.; Linear Technology Corp.; Maxim Integrated Products; Staples, Inc.; and UnitedHealth Group, Inc. The United Health derivative action settled for over \$700 million in cash and re-priced or surrendered options – the largest derivative action options settlement on record. Other notable settlements included Maxim (approximately \$38 million in cash and re-priced and surrendered options); Affiliated Computer Services (approximately \$40 million in cash and re-priced and surrendered options); Cablevision (approximately \$34 million in cash and other consideration); Staples (approximately \$8.2 million in cash and re-priced options); Linear (\$4.5 million in cash and re-priced options as well as corporate governance changes).
- Shapiro Haber & Urmy was one of the court-appointed lead counsel in the consolidated derivative action brought on behalf of the HealthSouth Corporation against its former CEO, Richard Scrushy, its other former officers and directors, and others. This action coordinated derivative actions brought on behalf of HealthSouth in the Delaware Chancery Court, the Federal District Court in Alabama, and the state court in Birmingham, Alabama. The legal team, on which Shapiro Haber & Urmy served as one of the lead counsel, obtained the following recoveries for HealthSouth: (i) summary judgment in the Delaware Chancery Court for over \$17 million, *In re HealthSouth Corp. S’holders Litig.*, 845 A.2d 1096 (Del. Ch. 2003), *aff’d*, 847 A.2d 1121 (Del. 2004); (ii) summary judgment in the Circuit Court of Jefferson County, Alabama for over \$47 million, see *Tucker v. Scrushy*, 2006 WL 37028 (Ala. Cir. Ct. Jan. 3, 2006), *aff’d*, 2006 WL 2458818 (Ala. Aug. 25, 2006); (iii) a settlement of the derivative claims against some of the officers and directors of HealthSouth for \$100 million; (iv) a \$133 million settlement of the derivative claims against HealthSouth’s former investment advisor,

UBS; and (v) a \$2.8 billion dollar judgment against Mr. Scrusby after a bench trial in the Circuit Court of Jefferson County, Alabama.

- Shapiro Haber & Urmy was the court-appointed co-chairman of the Plaintiffs' Executive Committee in *In re Merrill Lynch Analyst Reports Sec. Litig.*, 02-MDL-1484 (S.D.N.Y.). The firm was also court-appointed lead counsel in two of the Merrill Lynch securities analyst cases: *InfoSpace Analyst Reports Sec. Litig.*, and *Internet Capital Group Analyst Reports Sec. Litig.* The Court approved a settlement in the amount of \$125 million.
- Shapiro Haber & Urmy was lead counsel in two analyst conflict of interest cases against Credit Suisse First Boston on behalf of the shareholders of Winstar Communications, Inc. and Razorfish, Inc., both of which produced multi-million dollar recoveries. *Ahearn v. Credit Suisse First Boston (Winstar)* (D. Mass.); *Swack v. Credit Suisse First Boston (Razorfish)* (D. Mass.).
- Shapiro Haber & Urmy was on the executive committee prosecuting a securities class action alleging fraud against the former officers and auditors of now bankrupt Winstar Communications, Inc. The lawsuit also alleged that Lucent Technologies participated in the fraud. The case against the former officers settled for \$18.125 million and the case against Lucent settled for \$12 million. The case against the auditors settled shortly before trial in June 2013 for \$10 million. *In re Winstar Commc'ns Inc. Sec. Litig.* (S.D.N.Y.).
- Shapiro Haber & Urmy was co-lead counsel in a class action alleging fraud against former officers and auditors of Actrade Financial Technologies. A settlement for \$5,250,000 recently received final approval in the Southern District of New York. *In re Actrade Fin. Techs., Inc. Sec. Litig.* (S.D.N.Y.).
- Shapiro Haber & Urmy represented a class of persons who had sold businesses to Waste Management, Inc. for common stock of Waste Management. The case arose from Waste Management's restatement of its financial statements. Shapiro Haber & Urmy obtained summary judgment against Waste Management as to liability for a majority of the class members. Shapiro Haber & Urmy also successfully defended defendant's appeal of the class certification order, *Mowbray v. Waste Management Holdings, Inc.*, 208 F.3d 288 (2000). The case was subsequently settled for a combination of cash and stock with a total value of \$25 million.
- Shapiro Haber & Urmy represented the Commonwealth of Massachusetts Pension Reserves Investment Trust ("PRIT") in a securities fraud action against Bear Stearns & Co., Inc. in the United States District Court for the Southern District of California. The case arose out of the sale of \$81 million in subordinated debentures issued by Weintraub Entertainment Group ("WEG"), a start-up film company. In February 1987, PRIT bought \$5 million in bonds from Bear Stearns, the placement agent for the issuer. WEG declared bankruptcy in 1990, and the bondholders lost virtually their entire investment. A class

action was filed in San Diego against Bear Stearns and others. PRIT also filed suit in 1991, and in 1993 our action was consolidated with the class action for discovery and trial. The case was tried to a jury in San Diego in the summer of 1998. Shapiro Haber & Urmy partner Thomas V. Urmy was PRIT's trial counsel. After a four-week trial, the jury found that Bear Stearns had committed securities fraud and entered a \$6.57 million verdict in favor of PRIT, representing 100% of the damages sought by PRIT at the trial. The case was subsequently settled while on appeal to the Ninth Circuit. *Pension Reserves Inv. Trust v. Bear Stearns & Co.* (S.D. Cal.).

- Shapiro Haber & Urmy represented shareholders of three ING Principal Protection Funds who brought suit alleging that the advisory fees charged are excessive and violate Section 36(b) of the Investment Company Act of 1940. The action was settled for payment by the defendants to the ING Principal Protection Funds of significant funds and a substantial reduction in investment advisory fees to be charged, which resulted in millions of dollars of future savings to the funds and their shareholders. *Price v. ING Funds Distributors, LLC* (D. Mass.).
- Shapiro Haber & Urmy was liaison counsel prosecuting a class action, pending in the United States District Court for the District of Massachusetts, alleging that State Street Bank and Trust Company breached its custodial agreements and other duties to its custodial clients in connection with a multi-million scheme to defraud committed by their investment advisor. *Handal v. State Street Corp.* (D. Mass.).
- Shapiro Haber & Urmy represented a Massachusetts bank in litigation against Merrill Lynch involving the sale of auction rate securities. *Cooperative Bank v. Merrill Lynch Pierce Fenner & Smith, Inc.* (S.D.N.Y. remanded to D. Mass.).
- Shapiro Haber & Urmy was one of plaintiffs' counsel in shareholder derivative litigation against Cendant Corporation, which arose from one of the largest financial frauds in American history. The case was settled for \$54 million. *In Re Cendant Corp. Deriv. Action Litig.* (D.N.J.).
- Shapiro Haber & Urmy represented the Trustee of UNIFI Communications, Inc., in a breach of fiduciary duty lawsuit against its former directors, alleging that they grossly mismanaged UNIFI in the period leading up to its bankruptcy, causing UNIFI's insolvency to deepen. Shapiro Haber & Urmy recovered \$3.95 million for UNIFI and its creditors. *Ferrari v. Ranalli* (D. Mass.).
- Shapiro Haber & Urmy represented shareholders of EcoScience Corp. in a breach of fiduciary duty lawsuit against its former directors, arising out of the merger between EcoScience and Agro Power Development, Inc. The case, brought in the Delaware Chancery Court, charged that the merger was accomplished by means of a false proxy statement, and resulted in the payment of an unfair price to EcoScience shareholders. Shapiro Haber & Urmy recovered \$2 million for EcoScience's shareholders. *Smalley v. DeGiglio* (Del. Ch.).

- Shapiro Haber & Urmy represented shareholders in a class action alleging securities violations in connection with a secondary offering of Digital Equipment Corp. securities. After dismissal by the District Court, partner Thomas Shapiro successfully argued the appeal to the First Circuit in *Shaw v. Digital Equipment Corp.*, 83 F.3d 1194 (1st Cir. 1996). The case was thereafter settled for \$5.2 million.
- Shapiro Haber & Urmy has recovered substantial settlements for defrauded shareholders by prosecuting securities class action suits on behalf of shareholders of, *inter alia*: Bank of New England Corp. (\$6.5 million); Bank of New England Corp. bondholders (\$8.4 million); Biopure Corp. (\$10 million); Centennial Tech., Inc. (stock and cash with a value of approximately \$20 million); Inso Corp. (\$12 million); Kendall Square Research Corp. (cash, stock and warrants, with a total value of approximately \$17 million); Kurzweil Applied Intelligence, Inc. (\$9.625 million); Lotus Dev. Corp. (\$7.5 million); MicroCom, Inc. (\$6 million); Molten Metal Tech., Inc. (\$11.85 million); Monarch Capital Corp. (\$5 million); Open Environment Corp. (\$6 million); Pegasystems, Inc. (\$5.25 million); Picturitel Corp. (\$12 million); Presstek, Inc. (\$20 million); Minoco Oil and Gas Drilling Limited Partnerships (\$15 million).

### SECURITIES LITIGATION TRIALS

Attorneys in the firm have conducted the following jury trials in securities cases. Attorneys in the firm have also conducted numerous civil and criminal jury trials in non-securities matters.

- Mr. Urmy obtained a favorable jury verdict on behalf of the PRIT Fund in a case tried in the United States District Court for the Southern District of California.
- Messrs. Shapiro and Haber were chief trial counsel in a securities class action entitled *Fulco v. Continental Cablevision*, C.A. No. 89-1342-Y, in a three-week jury trial before Judge Young in the United States District Court in Boston. The case was brought on behalf of the limited partners in four partnerships that owned and operated cable television systems. The jury returned a verdict for the plaintiffs for approximately \$4.5 million.
- Mr. Shapiro was chief trial counsel in a securities fraud class action against Polaroid Corporation in federal court in Boston, which resulted in a jury verdict with an estimated value of \$30 million. A panel of the Court of Appeals for the First Circuit found error in the jury instructions and remanded the case for a new trial. Polaroid then petitioned for and received *en banc* reconsideration. Sitting *en banc*, the First Circuit reversed the judgment. *Backman v. Polaroid Corp.*, 910 F.2d 10 (1st Cir. 1990).

- Mr. Shapiro represented a business owner in a suit against a public company in Massachusetts that acquired his business in exchange for \$11 million in company stock. The suit alleged that the stock price was artificially inflated as a result of false financial statements. Mr. Shapiro conducted the bench trial in 2009 against lawyers from three of the largest firms in Boston.
- Mr. Shapiro represented a customer in an NASD arbitration trial against Oppenheimer & Co. and the broker, and recovered out of pocket losses, unrealized investment gains per a model portfolio theory, interest on the damages, and an award of attorneys' fees.
- Mr. Haber and Ms. Blauner represented one partner in a suit against another partner for breach of fiduciary duty. The case was tried to a jury in the federal court in Boston, which returned a verdict in favor of our client in the full amount of the damages sought. The verdict was affirmed on appeal. *Wartski v. Bedford*, 926 F.2d 11 (1st Cir. 1991).
- Mr. Shapiro was co-trial counsel for a defendant in a jury-waived trial on an indictment for fraud in the sale of securities, filing false financial statements, and conspiracy. Mr. Shapiro was also on the brief in the appeal from that conviction. *United States v. Lieberman*, 608 F.2d 889 (1st Cir. 1979).

### SECURITIES LITIGATION APPEALS

Attorneys at Shapiro Haber & Urmy had principal responsibility for the brief, and presented the oral argument, in the following appeals in securities cases.

- *In re PolyMedica Corp. Sec. Litig.*, 432 F.3d 1 (1st Cir. 2005)
- *Lentell v. Merrill Lynch & Co., Inc.*, 396 F.3d 161 (2d Cir. 2005)
- *Geffon v. Micrion Corp.*, 249 F.3d 29 (1st Cir. 2001)
- *Mowbray v. Waste Mgmt.*, 203 F.3d 288 (1st Cir. 2000)
- *Wells v. Monarch Capital Corp.*, 129 F.3d 1253 (Table) (1st Cir. 1997)
- *Alpha Group Consultants Ltd. v. Bear Stearns*, 119 F.3d 5 (Table) (9th Cir. 1997)
- *Glassman v. Computervision, Inc.*, 90 F.3d 617 (1st Cir. 1996)
- *Shaw v. Digital Equip. Corp.*, 82 F.3d 1194 (1st Cir. 1996)
- *Wartski v. Bedford*, 926 F.2d 11 (1st Cir. 1991)
- *Backman v. Polaroid Corp.*, 910 F.2d 10 (1st Cir. 1990)
- *Roeder v. Alpha Indus., Inc.*, 814 F.2d 22 (1st Cir. 1987)
- *Frishman v. Maginn*, 75 Mass. App. Ct. 103 (2009)
- *Wolf v. Prudential-Bache Sec., Inc.*, 41 Mass. App. Ct. 474 (1996)
- *Kessler v. Sinclair*, 37 Mass. App. Ct. 573 (1994)

## ERISA LITIGATION

- Shapiro Haber & Urmy has been appointed co-lead counsel and is currently prosecuting an ERISA class action consolidated in the United States District Court for the District of Massachusetts against Fidelity Management & Trust Co. The case is brought on behalf of participants in 401(k) plans for Bank of America, EMC Corp. and Safety Insurance Co. and alleges that Fidelity misused the plans' "float income" by temporarily investing it for its own benefit, in violation of the Employee Retirement Income Securities Act. *In re Fidelity ERISA Float Litig.* (D. Mass.)
- Shapiro Haber & Urmy is counsel for Xerox employees who have sued the Xerox Corporation Guarantee Income Plan for breach of fiduciary duty in the calculation of retirement benefits. The case alleges that the administrators of the plan have breached their fiduciary duties by not calculating benefits for all similarly situated plan participants in the same way, and seeks to represent a class of Xerox employees. The case is pending in the Western District of New York. *Kunzman v. Conkright* (W.D.N.Y.)
- Shapiro Haber & Urmy was lead counsel prosecuting an ERISA class action, pending in the United States District Court for the District of Massachusetts, on behalf of the participants in State Street Corporation's Salary Savings Plan against State Street Corp. and the administrators of the Plan. Plaintiff alleges that State Street breached its fiduciary duties to the Plan participants by continuing to offer State Street stock as an investment option under the Plan, when the stock was overvalued and no longer a prudent investment alternative, and that defendants made material misrepresentations about the company's foreign exchange trading revenue in communications with Plan participants who had invested in State Street stock. The case settled for \$10 million. *Richard v. State Street Corp.* (D. Mass.).
- Shapiro Haber & Urmy also was as liaison counsel prosecuting an ERISA class action in the United State District Court for the District of Massachusetts on behalf of a plan administrator of the a 401(k) Plan, against Massachusetts Mutual Life Insurance Company arising out of MassMutual's receipt of revenue sharing payments from the mutual funds on its platform as kickbacks and/or a "pay to play" scheme in connection with the placing, retaining and adding the mutual funds on the menu of available funds in its 401(a) and 401(k) programs. The case settled for \$10 million. *Golden Star, Inc. v. Mass Mutual Life Insurance Co.*, C.A. No. 11-cv-30235 (D. Mass.).
- Shapiro Haber & Urmy represented former employees of Stone & Webster, Inc. to recover damages suffered by the company's retirement plans for breach of fiduciary duty under ERISA by certain former officers and directors of Stone & Webster who were fiduciaries of the plans when they continued to offer Stone & Webster stock as an investment option in the period before Stone & Webster filed for bankruptcy. The action settled for \$8 million. *Stein v. Smith* (D. Mass.)



- Shapiro Haber & Urmy LLP's litigated a class action under ERISA relating to Aetna's Life Insurance Company's improper denial of health insurance benefits in refusing to cover medical expenses incurred from the non-hospital use of a continuous passive motion machine prescribed by the plaintiff's and class members' health care professionals to treat knee injuries. In settlement, Shapiro Haber & Urmy obtained 56% of the amount of each claim for benefits for members of the settlement class. *Jaggard v. Aetna Life Ins. Co.* (D. Mass.).
- Shapiro Haber & Urmy LLP litigated a class action under ERISA against Digital Equipment Corporation and John Hancock Life Insurance Company arising out of Digital's decision to refund surplus life insurance premiums to current company employees but not to former company employees. Shapiro Haber & Urmy represented a class of former Digital Equipment employees who were participants in the life insurance plan, and who maintained that Digital Equipment had discriminated against its former employees who had paid excessive premiums under the life insurance plan. Shapiro Haber & Urmy LLP successfully settled obtained a multimillion dollar settlement for the class. *Michniewich v. Digital Equipment Corp.* (D. Mass.).

### **WHISTLE-BLOWER ACTIONS**

Shapiro Haber & Urmy has handled a number of whistleblower cases over the years, including under the federal False Claims Act and pursuant to the Securities and Exchange Commission's ("SEC") recently promulgated regulations under the Dodd-Frank Act. For example, the firm served as counsel to a whistle-blower alleging that Raytheon had violated the federal False Claims Act. In addition, the firm currently represents whistle-blowers in three separate matters brought pursuant to the SEC's new whistle-blower program. In each of those cases, the firm is assisting the whistle-blower in providing information to the SEC about possible violations of the federal securities laws by the whistle-blowers' former employers.

### **WAGE AND HOUR LITIGATION**

Shapiro Haber & Urmy has successfully represented plaintiff employees in many wage and hour individual and class actions for employee misclassification and in actions seeking to recover overtime pay owed to them under both state and federal law. Such cases have been successfully prosecuted in federal and state courts in Massachusetts and other states, recovering millions of dollars in damages from employers such as Electronic Arts; Sony Computer Entertainment America, Inc.; Arbella Insurance Company; Liberty Mutual Insurance Company; Continental Insurance Company; USAA; Ames Department Stores, Inc.; Argenbright, Inc.; Abercrombie & Fitch; Lane Bryant, Inc.; Express; United Parcel Service; Footbridge, and AM Broadband LLC. Shapiro Haber & Urmy is currently prosecuting wage claims against CVS and Pepperidge Farms.

## ATTORNEY BIOGRAPHIES

### Partners:

#### **Edward F. Haber**

Mr. Haber graduated from Cornell University in 1966 and from Harvard Law School (*cum laude*) in 1969. Upon graduation from Harvard Law School, he taught at the Boston College Law School during the 1969-1970 academic year. Mr. Haber has an AV rating from Martindale-Hubbell, and has been named a Massachusetts Super Lawyer in the field of securities litigation for the past several years, most recently in 2017. He has also been named to the national list of Super Lawyers in the Corporate Counsel Edition for securities litigation, and was recognized as a Top Rated Litigator by *The American Lawyer* in 2016. In 1988 and 1990, he was on the faculty of the New England Federal Securities Regulation Institute, sponsored by the American Law Institute/American Bar Association Committee on Continuing Professional Education. In April 1992, he was on the faculty of the Massachusetts Bar Association's seminar on the Fundamentals of Securities Arbitration. Mr. Haber is a member of the Bars of the Commonwealth of Massachusetts, the Supreme Court of the United States, the United States Courts of Appeals for the First and Seventh Circuits, and the United States District Court for the District of Massachusetts.

#### **Michelle H. Blauner**

Ms. Blauner is a 1983 graduate of Cornell University (with highest distinction) and a 1986 graduate of Harvard Law School (*cum laude*). She has been named a Massachusetts Super Lawyer numerous times, most recently in 2017. In 2013, Ms. Blauner was named one of the top 50 Woman Massachusetts Super Lawyers. Upon graduation she became an associate at the Boston law firm of Foley, Hoag & Elliot. In 1988 she joined the firm as an associate, and she became a partner in 1993. Ms. Blauner has worked on many of the complex class actions prosecuted by the firm. She is co-author, with Mr. Shapiro, of *Securities Litigation in the Aftermath of In Re Data Access Securities Litigation*, 24 New. Eng. L. Rev. 537 (1990). Ms. Blauner is a member of the Bars of the Commonwealth of Massachusetts, the United States District Courts for the Districts of Massachusetts and Colorado, and the United States Court of Appeals for the First Circuit.

### Associates:

#### **Adam M. Stewart**

Mr. Stewart is a 2001 graduate of Northeastern University (*magna cum laude*) and a 2004 graduate of Suffolk University Law School (*magna cum laude*). He has been named a Massachusetts Super Lawyer Rising Star from 2011 through 2017. He was a law clerk to the Justices of the Massachusetts Superior Court from 2004 to 2005 and joined Shapiro Haber & Urmey in 2005. He is the author of *The Silent Domino: Allowing Pre-Arrest Silence As Substantive Evidence of Guilt and The Possible Effect on Miranda*, 37 Suffolk Univ. L. Rev. 189 (2004). He is a member of the Bars of the Commonwealth of

Massachusetts, the United States District Court for the District of Massachusetts, and the United States Court of Appeals for the First Circuit.

**Patrick J. Valley**

Mr. Valley is a 2002 graduate of the University of Dayton (*magna cum laude*) and a 2005 graduate of The University of Chicago Law School (*with honors*), where he was Editor in Chief of the *Chicago Journal of International Law*. He was named a Massachusetts Super Lawyer Rising Star from 2013 through 2017. He was a litigation associate at the Boston law firm of Foley Hoag from 2005 to 2012, and joined Shapiro Haber & Urmey in 2012. He is a member of the Bars of the Commonwealth of Massachusetts and the United States District Court for the District of Massachusetts.

**Jonathan F. Dinerstein**

Mr. Dinerstein is a 2009 graduate of Tufts University and a 2016 graduate of Boston University School of Law (*magna cum laude*), where he was an Articles Editor for the Boston University Law Review. He joined Shapiro Haber & Urmey in 2017. He is a member of the Bar of the Commonwealth of Massachusetts.

**Counsel:**

**Thomas G. Shapiro**

Mr. Shapiro graduated from Harvard College (*magna cum laude*) in 1965 and from Harvard Law School (*cum laude*) in 1969. Mr. Shapiro is well known for his expertise and experience in securities litigation. He has an AV rating from Martindale-Hubbell and has been named a Massachusetts Super Lawyer numerous times, most recently in 2017. He has also been named to the national list of Super Lawyers in the Corporate Counsel Edition for securities litigation, and was recognized as a Top Rated Litigator by *The American Lawyer* in 2016. He has been a faculty member in continuing legal education programs concerning securities litigation sponsored by the Practising Law Institute, ALI-ABA, Massachusetts Continuing Legal Education, Massachusetts Academy of Trial Attorneys, and the Boston Bar Association. Mr. Shapiro has lectured on securities litigation issues for the American Corporate Counsel Association and at a NASDAQ Financial Executive Conference for senior officers of NASDAQ companies. Mr. Shapiro was also on the faculty of the Flaschner Judicial Institute's seminar for Massachusetts Superior Court judges on the Trial and Management of Complex Cases.

Mr. Shapiro is the author of the chapter "Depositions in Class Actions" in Massachusetts Deposition Practice Manual, published by Massachusetts Continuing Legal Education in 1992, and co-author of *Securities Litigation in the Aftermath of In Re Data Access Securities Litigation*, 24 New. Eng. L. Rev. 537 (1990). He served as the first Chairman of the Federal Practice Committee of the Massachusetts Bar Association. He is a member of the Bars of the Commonwealth of Massachusetts, the United States District Court for the District of Massachusetts, the United States Court of Appeals for the First Circuit, and the Supreme Court of the United States.

**Thomas V. Urmv, Jr.**

Mr. Urmv graduated from Amherst College (*cum laude*) in 1960 and from Yale Law School in 1964. He has an AV rating from Martindale-Hubbell and has been named a Massachusetts Super Lawyer numerous times, most recently in 2017. In 2016, he was also recognized as a Top Rated Litigator by *The American Lawyer*. Between 1964 and 1972, Mr. Urmv was the personal assistant and associate for the Honorable Whitman Knapp, who was named as the head of the Commission to Investigate Police Corruption in New York City and later a Judge of the United States District Court for the Southern District of New York. Before formation of the current firm in 1988, Mr. Urmv was a partner in the Boston law firm Warner & Stackpole.

Mr. Urmv is a member of the Bars of the Commonwealth of Massachusetts, the United States District Courts for the District of Massachusetts and the Southern and Eastern Districts of New York, the United States Courts of Appeals for the First, Second, Third, Ninth, and District of Columbia Circuits, and the United States Supreme Court.



# **EXHIBIT 8**

costs and matter id = '649' and not hidden and not on hold

<u>Description</u>	<u>Cost</u>
<b>Matter ID: 649</b>	
<b>Description: City of Boston</b>	
In-house printing	181.70
In-House Copying @ \$.10/page	1.70
Research - Online	1,083.02
Travel - airline/car/mileage/taxi/gas	272.02
Travel - Lodging	501.02
Telephone	4.06
In-House Postage	1.02
<b>Total For this Matter and Date Range in Query:</b>	<b>2,044.54</b>

## GBDH Costs Detail

costs and matter id = '649' and not hidden and not on hold

Date	Narrative	Value
03/31/2017	In-house printing	1.90
07/31/2017	In-House Copying @ \$.10/page	0.30
07/31/2017	In-house printing	1.70
08/31/2017	In-house printing	4.90
10/31/2017	In-house printing	0.30
02/28/2018	In-house printing	0.90
07/31/2018	Westlaw 7/2018	99.91
10/30/2018	L. Dardarian - flight cancellation	(129.00)
10/30/2018	L. Dardarian - flight change fee	200.00
10/31/2018	In-house printing	28.70
02/28/2019	In-house printing	1.70
03/25/2019	City National Bank - Linda Dardarian - Lodging at The Envoy Hotel to attend meeting with City of Boston on 4/4/2019.	389.00
03/25/2019	American Express - Linda Dardarian - Amtrak from Philadelphia to Boston for meeting w/ City.	121.00
03/31/2019	In-house printing	6.10
04/04/2019	City National Bank - L. Dardarian - cab from airport to DLC for meeting w/ S. Eichner and City	32.65
04/04/2019	City National Bank - L. Dardarian - cab to hotel	9.60
04/04/2019	City National Bank - L. Dardarian - cab to airport	37.77
04/08/2019	PACER Q1 2019 - Invoice # 2633640-Q12019	3.00
05/06/2019	City National Bank - April 2019 - The Envoy Hotel	112.02
05/31/2019	In-house printing	5.20
06/30/2019	In-house printing	11.40
07/31/2018	In-house printing	20.00
08/31/2019	In-house printing	9.00
09/30/2019	In-house printing	0.20
10/31/2019	In-house printing	15.40
10/24/2019	Level 3 Communications, LLC - Invoice # 85678098 - R. Wendell conference call	4.06
11/30/2019	In-house printing	4.90
12/31/2019	In-house printing	16.90
01/31/2020	In-house printing	8.70
03/31/2020	In-house printing	11.20
03/31/2020	RELX Inc. DBA LexisNexis - Invoice # 3092567417 - March 2020	4.65
06/30/2020	In-house printing	6.10



**GBDH Costs Detail**

costs and matter id = '649' and not hidden and not on hold

<b>Date</b>	<b>Narrative</b>	<b>Value</b>
08/31/2020	In-house printing	8.20
09/30/2020	In-house printing	4.90
11/30/2020	In-house printing	3.50
11/30/2020	American Express - RELX DBA Lexis Nexis - Invoice # 3092993525 - November 2020	183.33
11/30/2020	American Express - RELX DBA Lexis Nexis - Invoice # 3092993525 - November 2020	27.45
12/31/2020	American Express - Relx DBA Lexis Nexis - Invoice # 3093031107 - December 2020	161.46
01/04/2021	City National Bank - Statement date 1/4/21 - S. Kirkpatrick - WK Elm Solutions - 2020 Real Rate Report	500.00
03/31/2021	In-house printing	0.10
03/31/2021	American Express - Relx, DBA Lexis Nexis - Invoice # 3093171654 - March 2021	51.62
04/30/2021	In-house printing	1.00
04/30/2021	American Express - Relx DBA Lexis Nexis - Invoice #3093237735 - April 2021	13.34
06/01/2021	Thomson Reuters - West - Invoice # 844441543 - May 2021	3.84
07/01/2021	Thomson Reuters - West - Invoice # 844608600 - June 2021	34.42
07/31/2021	In-House Postage	1.02
07/31/2021	In-House Copying @ \$.10/page	1.40
07/31/2021	In-house printing	8.80
<b>Grand Total:</b>		<b>\$2,044.54</b>

# **EXHIBIT 9**

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Attorneys for Defendant  
*(Additional Defendant's attorneys listed on the following page)*

**UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION**

ALLEN HINES, TESS RAUNIG, and  
CAROLEZOOM, on behalf of themselves and  
all others similarly situated,

Plaintiffs,

vs.

CITY OF PORTLAND,

Defendant.

Case No.: 3:18-cv-00869-HZ

**CLASS ACTION**

**FINAL JUDGMENT AND  
ORDER APPROVING CLASS ACTION  
SETTLEMENT**

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Attorneys for Defendant  
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WHEREAS, on September 24, 2018, the Court held a hearing (the “Fairness Hearing”) to determine, among other things, whether the Settlement in this action by Defendant City of Portland (“the City”) and Plaintiffs Allen Hines, Tess Raunig, and Carole Zoom (“Plaintiffs”), as set forth in the Consent Decree, a copy of which is attached hereto as Exhibit 1 (the “Consent Decree”), is fair, reasonable and adequate, such that an Order of final approval should be issued and a final judgment upon said Consent Decree should be entered by the Court,

WHEREAS, the Fairness Hearing was attended by the Parties, through their respective counsel of record in this action, and by such other individuals and entities as set forth in the record in this matter, and

NOW, THEREFORE, IT IS HEREBY ORDERED, ADJUDGED AND DECREED AS FOLLOWS:

1. The Court, for the purposes of this Judgment, adopts the terms and definitions set forth in the Consent Decree.
2. The Court has jurisdiction over the subject matter of this action, the Plaintiffs, the Settlement Class, the Consent Decree, and the City.
3. The Court finds that the notice to the Settlement Class of the pendency of this action and of the proposed Settlement was disseminated by each of the means required under the Consent Decree and the Order of this Court dated June 4, 2018, and was otherwise fully implemented.
4. The Court finds that such notice to the Settlement Class, as ordered and implemented, was reasonably calculated under the circumstances to apprise the Settlement Class Members of the pendency of this action, all material elements of the proposed Settlement, and their opportunity (a) to submit written objections to or comments on the Settlement, and (b) to

appear at the Fairness Hearing to object to or comment on the Settlement. The Notice of Settlement was reasonable and the best notice practicable to all Settlement Class Members and complied with the Federal Rules of Civil Procedure, due process, and all other applicable laws and rules. A full and fair opportunity has been afforded to the members of the Settlement Class to participate during the Fairness Hearing, and all other persons wishing to be heard have been heard. Accordingly, the Court determines that all members of the Settlement Class, as set forth below, are bound by this Judgment.

5. No Class Member submitted an objection to the Settlement.

6. On June 4, 2018, this Court appointed Plaintiffs as class representatives of the Settlement Class, and appointed the following counsel as Class Counsel to represent the Settlement Class: (i) Goldstein Borgen Dardarian & Ho; (ii) Civil Rights Education and Enforcement Center; and (iii) Portland Civil Rights Law Office.

7. On June 4, 2018, this Court provisionally certified the Settlement Class based on the findings in the Order of the same date. This Court finds that the Settlement Class continues to meet the requirements for class certification under the Federal Rules of Civil Procedure and all other applicable laws and rules.

8. In particular, the Court finds that: (a) joinder of all Settlement Class Members in a single proceeding would be impracticable, if not impossible, because of their numbers and dispersion; (b) there are questions of law and fact common to the Settlement Class; (c) Plaintiffs' claims are typical of the claims of the Settlement Class that they seek to represent for purposes of settlement; (d) Plaintiffs have fairly and adequately represented the interests of the Settlement Class and will continue to do so; (e) Plaintiffs and the Settlement Class are represented by qualified, reputable counsel who are experienced in preparing and prosecuting class actions,

including those involving the sort of practices alleged in the Complaint; and (f) the City acted or refused to act on grounds that apply to the Settlement Class, so that final declaratory and injunctive relief is appropriate to the Settlement Class.

9. Class certification is therefore an appropriate method for protecting the interests of the Settlement Class and resolving the common issues of fact and law arising out of the Plaintiffs' claims while also eliminating the risk of duplicative litigation. Accordingly, the Court hereby makes final its earlier provisional certification of the Settlement Class and further confirms the appointment of the Class Representatives and Class Counsel to represent the Settlement Class, as set forth above.

10. The Court grants final approval of the Settlement set forth in the Consent Decree and finds that it is fair, reasonable, adequate, and in the best interests of the Settlement Class as a whole.

11. The Court further finds that the City's Annual Commitment, which requires the installation or remediation of 18,000 curb ramps over the course of 12 years, as set forth in the Consent Decree is proper and reasonably calculated based on the available information to maintain and ensure accessibility of the pedestrian right of way located in the City of Portland to persons with Mobility Disabilities.

12. The City's Annual Report as set forth in Section V.H. of the Consent Decree shall also be filed with the Court on the same day it is provided to Class Counsel. With this addition, the Settlement shall be consummated in accordance with the terms and conditions of the Consent Decree.

13. The Class Representatives and all Settlement Class Members (and their respective heirs, assigns, successors, executors, administrators, agents and representatives) are conclusively

deemed to have released and forever discharged the City from all Released Claims as set forth in the Consent Decree. All members of the Settlement Class are bound by this Judgment.

14. The Court finds Class Counsel's requested award for attorneys' fees, expenses, and costs fair and reasonable. The Court therefore awards \$334,666 to Class Counsel for fees, expenses, and costs through the Effective Date.

15. The Court finds the requested service awards for Class Representatives fair and reasonable in light of their significant contributions to the Class. The Court therefore awards \$5,000 each (\$15,000 total) to Plaintiffs and Class Representatives Allen Hines, Tess Raunig, and Carole Zoom.

16. The benefits described in the Consent Decree are the only consideration, fees, costs and expenses that the City shall be obligated to give to any party or entity, including without limitation the Class Representatives, Settlement Class Members, and Class Counsel in connection with the claims released in the Consent Decree and/or the payment of attorneys' fees, costs and expenses in this action.

17. The Consent Decree and this Judgment are not admissions of liability or fault by the City, or a finding of the validity of any claims in this action or of any wrongdoing or violation of law by the City. The Consent Decree is not a concession by the Parties and, to the fullest extent permitted by law, neither this Judgment, nor any of its terms or provisions, nor any of the negotiations connected with it, shall be offered as evidence or received in evidence in any pending or future civil, criminal, or administrative action or proceeding to establish any liability of, or admission by the City.

18. Notwithstanding the foregoing, nothing in this Judgment shall be interpreted to prohibit the use of this Judgment to consummate or enforce the Consent Decree or Judgment, or



to defend against the assertion of Released Claims in any other proceeding, or as otherwise required by law.

19. In accordance with the terms of the Consent Decree, which is attached hereto, the Court reserves exclusive and continuing jurisdiction over Plaintiffs, the Settlement Class Members, the City, and the Consent Decree throughout the term of the Consent Decree, for the sole purpose of supervising the implementation, enforcement, construction, and interpretation of the Consent Decree and this Judgment. In that regard, any challenges to the Consent Decree's terms or implementation, whether under state or federal law, shall be subject to the exclusive and continuing jurisdiction of this Court.

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_

*9/27/2018*

*Marco Hernandez*  
\_\_\_\_\_  
Hon. Marco A. Hernandez  
United States District Judge

# **EXHIBIT 10**

Honorable Barbara J. Rothstein

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

CONRAD REYNOLDSON, STUART  
PIXLEY, and DAVID WHEDBEE, on  
behalf of themselves and all others similarly  
situated,

Plaintiffs,

v.

CITY OF SEATTLE, a public entity,

Defendants.

No. 2:15-cv-01608-BJR

ORDER GRANTING  
PLAINTIFFS' MOTION FOR CLASS  
REPRESENTATIVES' SERVICE AWARDS

CLASS ACTION

Based on the Court's consideration of Plaintiffs' Motion for Class Representatives' Service Awards, and the documents provided to the Court in support, the Court finds as follows:

1. Plaintiffs Conrad Reynoldson, Stuart Pixley, and David Whedbee have been actively involved in this case since approximately January 2014. Each of the three Plaintiffs was named a Class Representative by this Court on May 2, 2016.

2. Plaintiffs have made significant contributions to the investigation, litigation, mediation, and resolution of this case. Plaintiff Reynoldson estimated that he spent fifty-five hours, Plaintiff Pixley spent an estimated forty-two hours, and Plaintiff Whedbee spent an estimated fifty-three hours assisting on this case.

3. In addition to releasing all non-monetary claims against the City of Seattle as members of the class, Plaintiffs also agreed to release their individual claims against the City of Seattle for monetary relief.

4. The City of Seattle does not oppose the service award request, and no Class member has objected to it.

5. Plaintiffs' requested service award of \$5,000 each is fair, reasonable and adequate in light of the Plaintiffs' significant time and effort dedicated to this case, and their general release of claims against the City of Seattle.


Based on the Court's findings, the Court ORDERS:

1. Plaintiffs' Motion for Class Representatives' Service Awards is GRANTED.

2. Defendant shall pay \$5,000 to Plaintiff Conrad Reynoldson, \$5,000 to Plaintiff Stuart Pixley, and \$5,000 to Plaintiff David Whedbee as service awards for their contributions as Class Representatives and their general release of claims.

**IT IS SO ORDERED.**

Dated: Nov 1, 2017

  
Hon. Barbara J. Rothstein *Marska Rec Inw*  
*U.S. Dist Court*  
*Judge*

# **EXHIBIT 11**

*Muehe v. City of Boston*  
**Summary of Plaintiffs' Fees**

<b>Firm/Biller</b>	<b>Hours</b>	<b>Rate</b>	<b>Fees</b>
<b>Civil Rights Education and Enforcement Center</b>			
T. Fox	174.4	\$ 725.00	\$ 126,440.00
C. Hall	41.3	\$ 221.00	\$ 9,127.30
<b>CREEC Subtotal</b>	<b>215.7</b>		<b>\$ 135,567.30</b>
<b>Disability Law Center</b>			
Stan Eichner	26.7	\$ 575.00	\$ 15,352.50
Tom Murphy	170.9	\$ 500.00	\$ 85,450.00
<b>DLC Subtotal</b>	<b>197.6</b>		<b>\$ 100,802.50</b>
<b>Goldstein, Borgen, Dardarian &amp; Ho</b>			
Dardarian, Linda	207.3	\$ 795.00	\$ 164,803.50
Wendell, Raymond	363.0	\$ 495.00	\$ 179,685.00
Fisher, Katharine	20.2	\$ 465.00	\$ 9,393.00
Grimes, Scott	93.4	\$ 255.00	\$ 23,817.00
Kirkpatrick, Stuart	203.9	\$ 225.00	\$ 45,877.50
Valdez, Damon	110.9	\$ 225.00	\$ 24,952.50
<b>GBDH Subtotal</b>	<b>998.7</b>		<b>\$ 448,528.50</b>
<b>Grand Total</b>	<b>1,412.0</b>		<b>\$ 684,898.30</b>