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15 *Class Counsel*

16
17 **UNITED STATES DISTRICT COURT**
18 **CENTRAL DISTRICT OF CALIFORNIA**
19 **WESTERN DIVISION**

20 GREY FOX, LLC, et al.,
21 Plaintiffs,
22 v.
23 PLAINS ALL AMERICAN
PIPELINE, L.P. et al.,

24
25 Defendants.

Case No. 2:16-cv-03157-PSG-JEM

DECLARATION OF ROBERT J. NELSON IN SUPPORT OF MOTIONS FOR FINAL SETTLEMENT APPROVAL, PLAN OF ALLOCATION, AND ATTORNEYS' FEES AND COSTS

Hearing Date: May 10, 2024
Time: 1:30 p.m.
Judge: Hon. Philip S. Gutierrez
Courtroom: 6A

1 I, Robert J. Nelson, declare:

2 1. I am a partner in the law firm of Lief, Cabraser, Heimann &
3 Bernstein, LLP, and serve as Court appointed Class Counsel for the Plaintiffs in the
4 above-captioned action. I have personal knowledge of the facts set forth in this
5 Declaration, and, if called as a witness, could and would testify competently to
6 them.

7 2. I submit this declaration in support of Plaintiffs’ motions for final
8 approval of the proposed Settlement and for approval of the Plan of Allocation, as
9 well as Class Counsel’s motion for an award of attorneys’ fees, expenses, and class
10 representative service awards.

11 **A. Settlement Approval**

12 3. Since the inception of this case in 2016, my co-counsel and I have
13 personally supervised and directed every aspect of the prosecution and resolution of
14 this litigation on behalf of the Plaintiffs and Class.

15 4. The parties finalized the Settlement Agreement in March 2024. *See*
16 Dkt. 303-1, Ex. 1. The Settlement was reached almost eight years after Plaintiffs
17 commenced this action on May 6, 2016. *See* Dkt. 1.

18 5. The proposed Settlement is the product of arm’s length negotiations
19 spanning many years. Plaintiffs attempted to resolve this case relatively early on but
20 to no avail. Plaintiffs and Plains sought to mediate this case in 2016. The parties
21 first met for an in-person mediation session with Hon. Layn Phillips (Ret.) and
22 Robert Fairbank, both experienced mediators, on October 5, 2016. That mediation
23 effort continued through 2018, punctuated by several day-long sessions with Mr.
24 Fairbank. This mediation effort was unsuccessful, and the parties continued to
25 litigate.

26 6. Plaintiffs and PPC began a second mediation effort with respect to the
27 PPC Claims on July 20, 2023. This mediation was overseen by Robert A. Meyer,
28 Esq. of JAMS. *See* Dkt. 243. Plains did not participate in this mediation. While the

1 parties did not reach agreement at that mediation, they made some progress. The
2 parties, including Sable, continued negotiations over the next six months, reaching
3 agreement on key deal points and trading draft terms sheets. The parties continued
4 to negotiate numerous material terms and the full Agreement (with exhibits) was
5 finally executed on March 26, 2024. *See* Dkt. 297.

6 7. After reaching an agreement in principle, the parties worked diligently
7 to draft the Settlement Agreement, notices, and other Settlement exhibits, to select
8 the proposed Settlement Administrator, and to draft the Plan of Allocation.
9 Following preliminary approval, Plaintiffs worked with the Administrator to
10 execute the notice plan.

11 8. Based on the proposed Plan of Allocation, current estimates are that
12 the median payment to each of the 183 Class Properties will be approximately
13 \$90,000, the average payment will be approximately \$230,000, and the minimum
14 payment will be approximately \$50,150. Class member recoveries through this
15 Settlement for clarification of easement rights are significantly greater – indeed,
16 often orders of magnitude greater – than the amount of monies the Class members
17 (or the predecessors in interest) were paid for their original easements when
18 adjusted for inflation.

19 9. In my judgment, in light of the facts that fact and expert discovery had
20 been completed, legal questions had been fully briefed, and the case readied for
21 trial, this case was fully mature at the time the parties reached the Settlement. As a
22 result, Class Counsel are able to fairly judge the strengths and weaknesses of the
23 case. Based on that analysis, it is my judgment and the judgment of my fellow
24 Class Counsel that the proposed Settlement is fair, reasonable, and adequate, and
25 that the proposed resolution is in the Class’s best interests.

26 10. It is also my judgment and the judgment of my fellow Class Counsel
27 that the Plan of Allocation represents a fair and equitable allocation of the
28 settlement proceeds.

1 **B. Class Counsel’s Litigation Efforts**

2 11. This Court has previously appointed Lief Cabraser Heimann &
3 Bernstein, LLP, Keller Rohrback L.L.P., and Cappello & Noël to serve as Class
4 Counsel. *See* Dkt. 100 p. 14.

5 12. To Class Counsel’s knowledge, there is no direct supporting precedent
6 for the claim that forms the basis of this Settlement: that the easements had all
7 terminated as a result of the Pipeline shutdown. Nor is there direct precedent for the
8 Subclass members’ claim that their easements had all terminated due to the
9 automatic termination clauses in the easements. Likewise, there is no direct
10 supporting precedent for the certification of an easement class. As a result, Class
11 Counsel recognized this was a risky case to take on a contingency basis, and that
12 both class certification and merits arguments would turn on highly technical and
13 expert-driven factual disputes and cutting-edge interpretations of class action and
14 California tort law.

15 13. Plaintiffs propounded document requests, interrogatories, and requests
16 for admission on both Plains and PPC. To date, the documents produced for this
17 litigation (and the related *Andrews* litigation) totaled 1,403,036 pages. Of those
18 documents, approximately 38,471 pages were produced by Plains All American
19 Pipeline, L.P., and its incorporated association, Plains Pipeline, L.P. (collectively
20 “Plains”) and Pacific Pipeline Company (“PPC”) as part of this action. The
21 documents that Plains produced in the related *Andrews* action (and that have been
22 deemed produced in this action) total approximately 1,355,131 pages.

23 14. There were over twenty depositions taken in this case.

24 15. This case involved significant expert discovery. Prior to PPC’s joinder
25 as a Defendant, Plaintiffs retained four testifying experts who each submitted expert
26 reports. Plains submitted seven expert reports.

27 16. After PPC joined the case, Plaintiffs submitted three expert reports and
28 three rebuttal reports regarding the PPC claims. PPC retained two testifying experts

1 who each submitted a report and a rebuttal report. Each of Plaintiffs’ experts were
2 deposed and each of Defendants’ experts were deposed.

3 17. Trial of this matter was scheduled for May 9, 2024.

4 18. The novelty, complexity, and sheer scale of the litigation required
5 sustained and focused efforts by each Class Counsel law firm, and required the
6 involvement of experienced partners familiar with the intricacies and pitfalls of
7 class certification, expert discovery, and trial strategy.

8 19. The Class Counsel firms sought to coordinate their efforts to try to
9 ensure the case was prosecuted efficiently. The key lawyers at each firm
10 participated in regular teleconferences – generally on a weekly basis for the better
11 part of seven years – to ensure all tasks were assigned out to a given firm.
12 Deposition witnesses were assigned to each firm and each of the Plaintiffs’ experts
13 was also assigned to a single firm, which then took primary responsibility for
14 overseeing that expert’s work product and depositions. The firm assigned to an
15 expert also typically took primary responsibility for the corresponding defense
16 experts. At the same time, Class Counsel endeavored to coordinate all of these
17 efforts to ensure consistency among the many expert opinions.

18 **C. Lodestar and Expenses**

19 20. LCHB, alongside the other Class Counsel firms, litigated this case on a
20 purely contingent basis, foregoing other work in order to handle this complex
21 matter with no guarantee of recovery. While Class Counsel requests attorneys’ fees
22 as a percentage of the common fund, for the Court’s reference, I report LCHB’s and
23 Class Counsel’s summary time, lodestar, and costs incurred in this litigation and for
24 the benefit of the settling Class.

25 21. All LCHB time-keepers are required to contemporaneously record
26 their time in 6-minute increments. Attorneys working under my direction and
27 supervision audited my firm’s time records to confirm their accuracy. This included
28 removing any time exclusively attributed to the individual claims in this litigation,

1 time spent on Class Counsel’s motion for fees and costs, hours from timekeepers
2 with fewer than 10 hours in the case, and certain hours as a matter of billing
3 judgment. The figures do not include time incurred after August 7, 2024.

4 22. LCHB allocated work to maximize efficiency. To the extent
5 practicable, senior attorneys did not perform work that could be accomplished by
6 more junior attorneys, and attorneys did not perform work that could be completed
7 by paralegals or case clerks.

8 23. The hourly rates charged by LCHB fall within the range of market
9 rates charged by attorneys of equivalent experience, skill, and expertise. LCHB’s
10 rates reflect the market rates in the markets within which LCHB’s primary offices
11 are located and from which this matter has been handled—namely, San Francisco.
12 Except in rare circumstances, LCHB does not bill at different rates for different
13 clients or different types of cases. The 2024 billing rates charged by LCHB in Class
14 Counsel’s fee petition range from \$345 to \$1,380 per hour and fall within the range
15 of market rates charged by staff and attorneys of equivalent experience, skill, and
16 expertise.

17 24. Federal and state courts regularly approve LCHB rates. *See, e.g. In Re:*
18 *Google Location History Litigation*, No. 5-18-CV-05062 (N.D. Cal. May 3, 2024)
19 at p. 25 (approving LCHB 2024 rates); *Diaz et al. v. Google, LLC*, No. 21-CV-
20 03080-NC, Dkt. 79 ¶¶ 4, 8-9 (N.D. Cal. Oct. 31, 2022) (approved LCHB then-
21 current rates and awarding a 2.0 multiplier); *Ramirez v. Trans Union, LLC*, No. 12-
22 00632, 2022 WL 17722395, at *9 (N.D. Cal. Dec. 15, 2022) (finding that Lieff
23 Cabraser’s rates, at the time, “from \$1,325 to \$560 for partners and associates, and
24 \$485-\$455 for ‘litigation support’ and paralegals” were “generally in line with rates
25 prevailing in this community for similar services”); *Vianu v. AT&T Mobility LLC*,
26 No. 19-03602, 2022 WL 16823044, at *11 (N.D. Cal. Nov. 8, 2022) (finding Lieff
27 Cabraser’s “billing rates are normal and customary for timekeepers with similar
28 qualifications and experience in the relevant market”); *Cottle, et al. v. Plaid Inc.*,

1 No. 4:20-cv-03056-DMR, Dkt. 184 at *18-19 (N.D. Cal., July 20, 2022); *United*
2 *States v. Allergan, Inc.*, No. SACV18203JVSKESEX, 2023 WL 4754637, at *4
3 (C.D. Cal. July 24, 2023); *In re The Boeing Company Derivative Litigation*, No.
4 *Consol. C.A. No. 2019-0907-MTZ*, at *10 (Del. Ch. Mar. 22, 2022); *Stewart v.*
5 *Kaiser Foundation Health Plan, Inc. et al.*, CGC-21-590966 (CA Sup. Ct Mar. 10,
6 2022); *Jenkins, et al. v. National Grid USA Service Company, Inc., et al.*, No. 2:15-
7 cv-01219-JS-ARL, at *9-10 (E.D.N.Y. June 24, 2022); *Pulmonary Assocs. of*
8 *Charleston PLLC, et al. v. Greenway Health, LLC, et al.*, No. 3:19-cv-00167-TCB,
9 at *5-8 (N.D. Ga., Dec. 2, 2021); *In re Intuit Data Litig.*, No. 15-CV-1778-EJD-
10 SVK, 2019 WL 2166236, at *1 (N.D. Cal. May 15, 2019); *In re Anthem, Inc. Data*
11 *Breach Litig.*, No.15-MD-02617-LHK, 2018 WL 3960068, at *17 (N.D. Cal. Aug.
12 17, 2018).

13 25. Attached as Exhibit 1 is a true and correct summary lodestar chart
14 which lists: (1) the name of each LCHB timekeeper who recorded time in this case;
15 (2) their title or position; (3) the total number of hours they worked on the case
16 through and including August 7, 2024; (4) their current hourly rate; and (5) their
17 lodestar. For attorneys or support staff who no longer work with LCHB, the current
18 hourly rate is the rate for that individual in his or her final year of work with the
19 firm.

20 26. As reflected in Exhibit 1, the total number of hours expended on this
21 matter by Lieff Cabraser through August 7, 2024 is 6,108.20. The total lodestar for
22 my firm for that period is \$4,377,188.50.

23 27. The resulting lodestar for work performed by Class Counsel totals
24 \$14,267,222.50, and yields a modest multiplier of 1.62 for work performed to date.
25 That multiplier will only decrease as Class Counsel continue to work on the
26 approval and implementation of this proposed Settlement.

27 28. LCHB spent \$165,061.66 in connection with the investigation,
28 prosecution and settlement of this case. The expenses are presented in summary

1 form in Exhibit 2, which was generated from my firm’s accounting books and
2 records. Major cost categories include the document review platform my firm
3 maintained for all Class Counsel, other computer research platforms, printing,
4 travel, phones, and mail. These expenses were reasonably and necessarily incurred
5 to prosecute this case. The expenses here are in line with expenses LCHB has
6 incurred in the countless other very large, complex class action lawsuits it has
7 successfully prosecuted over the years, and are the type typically billed by attorneys
8 to clients.

9 29. Based on this information and the information submitted in my co-
10 counsel’s declarations, Class Counsel have together invested in this litigation as
11 follows: 17,812.37 hours, \$14,267,222.50 in lodestar, and \$1,195,207 in costs. I
12 expect each of these numbers will increase through final settlement approval and
13 settlement administration, meaning that any multiplier that Class Counsel receive
14 on their lodestar will continue to decrease over time.

15 **D. Class Representative Stipends**

16 30. Plaintiffs seek \$20,000 service awards each for two individual Class
17 Representatives, Mark Tautrim and Denise McNutt, and one award of \$20,000
18 collectively for entity Class Representatives Grey Fox, LLC, MAZ Properties, Inc.,
19 Bean Blossom Inc., and Winter Hawk LLC in recognition of their service and
20 efforts in prosecuting the case on behalf of the Class, subject to approval by the
21 Court.

22 31. The Class Representatives have been actively engaged throughout this
23 litigation. Each preserved and collected documents and electronic information
24 related to their claims, worked with Class Counsel to prepare responses to detailed
25 Interrogatories, actively monitored the progress of the litigation, and worked with
26 Class Counsel to review and evaluate the terms of the proposed Settlement
27 Agreement. Mark Tautrim and Denise McNutt both sat for deposition. Three
28 individuals sat for deposition on behalf of the Grey Fox entities, which in part

1 involved the Class claims at issue here. The Class Representatives uniformly
2 endorse the terms of the proposed Settlement. The service and efforts of the Class
3 Representatives in prosecuting the case on behalf of the Class are further described
4 in their declarations, true and correct copies of which are attached to this
5 Declaration as follows: Mark Tautrim (Exhibit 3); Denise McNutt (Exhibit 4);
6 Roger McMullin (Exhibit 5).

7 32. Attached hereto as Exhibit 6 is a true and correct copy of the
8 Declaration of Gina Intrepido-Bowden regarding Settlement Notice.

9 33. Attached as Exhibit 7 is a true and correct copy of the 2023 Real Rate
10 Report. Wolters Kluwer ELM Solutions, *2023 Real Rate Report: The Industry's*
11 *Leading Analysis of Law Firm Rates, Trends, and Practices* (2023).

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

14 Executed this 9th day of August, 2024, in City and County of San Francisco,
15 State and Northern District of California.

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/s/ Robert J. Nelson

EXHIBIT 1

LIEFF CABRASER HEIMANN & BERNSTEIN L.L.P.

Grey Fox, LLC, et al., v. Plains All American Pipeline, LP, et al.

Class Lodestar

Timekeeper	Title	Hours Worked	Hourly Rate	Lodestar
Robert Nelson	Partner	813.60	\$1,380.00	\$1,122,768.00
Nimish Desai	Partner	462.20	\$1,010.00	\$466,822.00
Sarah London	Partner	21.80	\$865.00	\$18,857.00
Wilson Dunlavey	Partner	1,062.50	\$745.00	\$791,562.50
Amelia Haselkorn	Associate	338.10	\$570.00	\$192,717.00
Philip Hernandez	Associate	97.50	\$345.00	\$33,637.50
Jacob Polin	Associate	153.60	\$720.00	\$110,592.00
William Hewitt	Contract Attorney	2,233.50	\$525.00	\$1,172,587.50
Robert Lief	Of Counsel	67.30	\$1,325.00	\$89,172.50
Eileen Beltran	Paralegal/Clerk	16.50	\$375.00	\$6,187.50
Alexandra Brilliant	Paralegal/Clerk	20.20	\$465.00	\$9,393.00
Cora La	Paralegal/Clerk	27.90	\$345.00	\$9,625.50
Maxwell Lucas	Paralegal/Clerk	209.60	\$490.00	\$102,704.00
Nethra Raman	Paralegal/Clerk	441.60	\$395.00	\$174,432.00
Nikki Belushko Barrows	Litigation Support/Research	16.50	\$535.00	\$8,827.50
Margie Calangian	Litigation Support/Research	42.60	\$535.00	\$22,791.00
Anthony Grant	Litigation Support/Research	38.40	\$535.00	\$20,544.00
Fawad Rahimi	Litigation Support/Research	26.30	\$535.00	\$14,070.50
Muna Texier	Litigation Support/Research	18.50	\$535.00	\$9,897.50
Total Lodestar:		6,108.20		\$4,377,188.50

EXHIBIT 2

LIEFF CABRASER HEIMANN & BERNSTEIN L.L.P.

Grey Fox, LLC, et al., v. Plains All American Pipeline, LP, et al.

Class Costs

Category	Amount
Printing	\$8,095.20
Telecommunications Charges	\$555.40
Computer Research	\$8,029.00
Depositions/Transcripts	\$5,159.00
Electronic Database	\$131,986.44
Federal Express/Messenger	\$278.63
Court Costs & Filing Fees	\$208.30
External Copy Services	\$1,190.52
Travel	\$9,559.17
Total Costs:	\$165,061.66

EXHIBIT 3

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Attorneys for Plaintiffs and the Class

17 **UNITED STATES DISTRICT COURT**
18 **CENTRAL DISTRICT OF CALIFORNIA**
19 **WESTERN DIVISION**

20 GREY FOX, LLC, et al.,
21 Plaintiffs,
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23 PLAINS ALL AMERICAN
PIPELINE, L.P. et al.,

24
25 Defendants.

Case No. 2:16-cv-03157-PSG-JEM

**DECLARATION OF MARK
TAUTRIM IN SUPPORT OF FINAL
APPROVAL; PLAN OF
ALLOCATION; FEES, EXPENSES,
AND SERVICE AWARDS**

Hearing Date: Sept. 13, 2024
Time: 1:30 p.m.
Judge: Hon. Philip S. Gutierrez
Courtroom: 6A

1 I, Mark Tautrim, declare as follows:

2 1. I am a named Plaintiff in this action representing the Class.

3 2. I submit this Declaration in support of Plaintiffs' motions for final
4 approval of the Settlement; approval of the Plan of Allocation; and fees, expenses,
5 and class representative service awards. I have personal knowledge of the facts
6 stated herein. If called to testify to the contents of this declaration, I could and
7 would competently do so.

8 3. I am a resident of Goleta, California, and the sole owner of the
9 property known as Orella Ranch, at 12750 Calle Real, Goleta, California ("the
10 Tautrim Property") as Trustee of the Mark W. Tautrim Revocable Trust. The
11 Tautrim Property is burdened with an easement for the Pipeline. I was an original
12 joint owner of the Tautrim Property and negotiated the easement directly with
13 Plains or its predecessor-in-interest, Celeron. The Right-of-Way Grant was
14 executed in 1988 and amended in 1994.

15 4. I voluntarily undertook the burdens and risks associated with this
16 lawsuit to seek compensation for the claims alleged herein. I understood that being
17 a plaintiff in this case entailed, among other things: having my name in a publicly
18 filed complaint; ongoing engagement with Class Counsel; participating in
19 discovery, including a possible deposition; participating in a potential trial; and
20 acting at all times in the best interest of the Class, including in any mediation or
21 settlement. I believed that without plaintiffs such as myself stepping forward to
22 serve as class representatives, Defendants would not compensate the people and
23 businesses they harmed.

24 5. I have participated actively in this lawsuit since January 17, 2017. I
25 met with Class Counsel in person or communicated with them by phone and e-mail
26 to stay informed, to discuss motion practice, amendments to the complaint,
27 discovery requests and responses, the district court's rulings, and litigation strategy,
28 including during the mediation and settlement negotiations. I will continue to do so

1 during this settlement approval process, as needed.

2 6. Among other tasks, I helped Class Counsel draft the section of the
3 complaint by describing to them my story and relevant facts and events. As part of
4 that process, I reviewed and provided Class Counsel with documents and
5 information, and I reviewed the draft complaint before it was filed and offered my
6 opinion, expertise and corrections on the section relevant to myself.

7 7. I searched for, preserved, and provided to counsel any documents that
8 were pertinent to the case multiple times over multiple years, understanding that
9 Defendant would receive copies of documents to which they were entitled,
10 including private and financially sensitive documents. I also reviewed or discussed
11 with Class Counsel numerous other documents related to this case, including
12 documents shared in discovery, the proposed settlement, and the settlement
13 approval papers. I worked closely with Class Counsel to respond to written
14 discovery requests as well.

15 8. I was deposed by Defendants on May 19, 2021. As part of that
16 process, I took substantial time out of my schedule to prepare and meet with
17 counsel, attend the deposition itself, and later review the transcript for errors.

18 9. I estimate that representatives on behalf of the above entities devoted
19 more than 100 hours to the work on behalf of the Class on this case since 2017,
20 including by working on the tasks described above.

21 10. I have reviewed the Settlement and the [Proposed] Plan of Allocation.
22 I strongly support them, as I believe they represent an excellent and fair resolution
23 of this case, while also avoiding the delays and risks of additional litigation, trial,
24 and appeals.

25 11. I have never been promised any compensation for performing my
26 duties as a plaintiff and class representative, including any service award, and I am
27 aware of no interest of mine in this litigation that conflicts with the interests of
28 other Class members. I understand, however, that Class Counsel also believe that

1 my contributions have made to this litigation justify a service award and intend to
2 request that the Court award me a total of \$20,000 for the time and efforts expended
3 on behalf of the Class, which the Court may or may not approve at its discretion. I
4 support my lawyers' request that I receive a service award of \$20,000 in
5 recognition of my work on this case over the last seven years.

6
7 I declare under penalty of perjury under the laws of the State of California
8 that the foregoing is true and correct.

9 Executed this 7th day of August 2024, at Moosehead Lake, ME.

10
11 By: 
12 Mark Tautrim

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Grey Fox Decl. of Mark Tautrim ISO Settlement

Final Audit Report

2024-08-08

Created:	2024-08-08
By:	Mandy Duong (mduong@cappellonoel.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAkODeUkPLHQGN5GeMJ_R-FeYW4Kg9NU80

"Grey Fox Decl. of Mark Tautrim ISO Settlement" History

-  Document created by Mandy Duong (mduong@cappellonoel.com)
2024-08-08 - 0:16:08 AM GMT
-  Document emailed to Mark Tautrim (mark@orellaranch.com) for signature
2024-08-08 - 0:16:12 AM GMT
-  Email viewed by Mark Tautrim (mark@orellaranch.com)
2024-08-08 - 1:39:39 AM GMT
-  Document e-signed by Mark Tautrim (mark@orellaranch.com)
Signature Date: 2024-08-08 - 10:34:18 PM GMT - Time Source: server
-  Agreement completed.
2024-08-08 - 10:34:18 PM GMT

EXHIBIT 4

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15 *Attorneys for Plaintiffs and the Class*

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17 **UNITED STATES DISTRICT COURT**
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25 Defendants.

Case No. 2:16-cv-03157-PSG-JEM

**DECLARATION OF DENISE
MCNUTT IN SUPPORT OF FINAL
APPROVAL; PLAN OF
ALLOCATION; FEES, EXPENSES,
AND SERVICE AWARDS**

Hearing Date: Sept. 13, 2024
Time: 1:30 p.m.
Judge: Hon. Philip S. Gutierrez
Courtroom: 6A

1 I, Denise McNutt, declare as follows:

2 1. I am a named Plaintiff in this action representing the Class.

3 2. I submit this Declaration in support of Plaintiffs' motions for final
4 approval of the Settlement; approval of the Plan of Allocation; and fees, expenses,
5 and class representative service awards. I have personal knowledge of the facts
6 stated herein. If called to testify to the contents of this declaration, I could and
7 would competently do so.

8 3. I am a resident of Santa Maria, California, and I am one of the owners
9 of the property known as 50 Pine Canyon Rd., Santa Maria, California. In 1984,
10 then-owners D. M. Wilson and Eleanor Wilson executed a Right-of-Way Grant.
11 The private contract easement allows the Pipeline to run through the north-west
12 section of the property. My husband and I purchased the property from the Jess and
13 Delores Limon, twelve years later for \$160,000.00.

14 4. I voluntarily undertook the burdens and risks associated with this
15 lawsuit to seek compensation for the claims alleged herein. I understood that being
16 a plaintiff in this case entailed, among other things: having my name in a publicly-
17 filed complaint; ongoing engagement with Class Counsel; participating in
18 discovery, including a possible deposition; participating in a potential trial; and
19 acting at all times in the best interest of the Class, including in any mediation or
20 settlement. I believed that without plaintiffs such as myself stepping forward to
21 serve as class representatives, Defendants would not compensate the people and
22 businesses they harmed.

23 5. I have participated actively in this lawsuit since August 18, 2018. I met
24 with Class Counsel in person or communicated with them by phone and e-mail to
25 stay informed, to discuss motion practice, amendments to the complaint, discovery
26 requests and responses, the district court's rulings, and litigation strategy, including
27 during the mediation and settlement negotiations. I will continue to do so during
28 this settlement approval process, as needed.

1 6. Among other tasks, I helped Class Counsel draft the complaint by
2 describing to them my story and relevant facts and events. As part of that process, I
3 reviewed and provided Class Counsel with documents and information, and I
4 reviewed the draft complaint before it was filed and offered my opinion, expertise
5 and corrections on the section relevant to myself.

6 7. I searched for, preserved, and provided to counsel any documents that
7 were pertinent to the case multiple times over multiple years, understanding that
8 Defendant would receive copies of documents to which they were entitled,
9 including private and financially sensitive documents. I also reviewed or discussed
10 with Class Counsel numerous other documents related to this case, including
11 documents shared in discovery, the proposed settlement, and the settlement
12 approval papers. I worked closely with Class Counsel to respond to written
13 discovery requests as well.

14 8. I was deposed by Defendant on March 26, 2021. As part of that
15 process, I took substantial time out of my schedule to prepare and meet with
16 counsel, attend the deposition itself, and later review the transcript for errors.

17 9. I estimate that I devoted more than 80 hours to the work on behalf of
18 the Class on this case since 2018, including by working on the tasks described
19 above.

20 10. I have reviewed the Settlement and the [Proposed] Plan of Allocation.
21 I strongly support them, as I believe they represent an excellent and fair resolution
22 of this case, while also avoiding the delays and risks of additional litigation, trial,
23 and appeals.

24 11. I have never been promised any compensation for performing my
25 duties as a plaintiff and class representative, including any service award, and I am
26 aware of no interest of mine in this litigation that conflicts with the interests of
27 other Class members. I understand, however, that Class Counsel also believe that
28 my contributions have made to this litigation justify a service award and intend to

1 request that the Court award me a total of \$20,000 for the time and efforts I
2 expended on behalf of the Class, which the Court may or may not approve at its
3 discretion. I support Class Counsel’s request that I receive a service award of
4 \$20,000 in recognition of my work on this case over the last seven years.

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

Executed this 8th day of August 2024, at Santa Maria, California.

By: *Denise McNutt*
Denise McNutt (Aug 8, 2024 14:15 PDT)
Denise McNutt

Grey Fox Decl. of Denise McNutt ISO Settlement

Final Audit Report

2024-08-08

Created:	2024-08-08
By:	Mandy Duong (mduong@cappellonoel.com)
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"Grey Fox Decl. of Denise McNutt ISO Settlement" History

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-  Email viewed by Denise McNutt (denise.mcnutt@atlascopco.com)
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-  Document e-signed by Denise McNutt (denise.mcnutt@atlascopco.com)
Signature Date: 2024-08-08 - 9:15:49 PM GMT - Time Source: server
-  Agreement completed.
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EXHIBIT 5

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15 *Attorneys for Plaintiffs and the Class*

16
17 **UNITED STATES DISTRICT COURT**
18 **CENTRAL DISTRICT OF CALIFORNIA**
19 **WESTERN DIVISION**

20 GREY FOX, LLC, et al.,
21 Plaintiffs,
22 v.
23 PLAINS ALL AMERICAN
PIPELINE, L.P. et al.,

24
25 Defendants.

Case No. 2:16-cv-03157-PSG-JEM

**DECLARATION OF ROGER
MCMULLIN IN SUPPORT OF
FINAL APPROVAL; PLAN OF
ALLOCATION; FEES, EXPENSES,
AND SERVICE AWARDS**

Hearing Date: Sept. 13, 2024
Time: 1:30 p.m.
Judge: Hon. Philip S. Gutierrez
Courtroom: 6A

1 I, Roger McMullin, declare as follows:

2 1. I am the Manager of Grey Fox, LLC, Bean Blossom, LLC, and Winter
3 Hawk, LLC. I am the Chief Executive Officer and Secretary of MAZ Properties,
4 Inc. These entities are named Plaintiffs in this action representing the Class.

5 2. I submit this Declaration in support of Plaintiffs’ motions for final
6 approval of the Settlement; approval of the Plan of Allocation; and fees, expenses,
7 and class representative service awards. I have personal knowledge of the facts
8 stated herein. If called to testify to the contents of this declaration, I could and
9 would competently do so.

10 3. Grey Fox, LLC (“Grey Fox”) is a California limited liability company
11 with its principal place of business in Goleta, California. It owns real property
12 located at 13600 Calle Real, Goleta, California in Santa Barbara County, California,
13 which real property is sometimes referred to as Lot X of El Rancho Tajiguas. Maz
14 Properties, Inc. (“MAZ”) is a California corporation with its principal place of
15 business in Goleta, California. It owns real property located in Santa Barbara
16 County, California located at 14000 Calle Real, Goleta, California in Santa Barbara
17 County, portions of which are sometimes referred to as Lot J and Lot B of El
18 Rancho Tajiguas. Bean Blossom, LLC (“Bean Blossom”) is a California limited
19 liability company with its principal place of business in Goleta, California. It owns
20 real property located at 14200 Calle Real, Goleta, California in Santa Barbara
21 County, California, sometimes referred to as Lot H of El Rancho Tajiguas. Winter
22 Hawk, LLC (“Winter Hawk”) is a California limited liability company with its
23 principal place of business in Goleta, California. It owns real property located in
24 Santa Barbara County, California, portions of which are sometimes referred to as
25 Lot C of El Rancho Tajiguas. MAZ originally acquired all of the above parcels of
26 real property as portions of the what is commonly known as El Rancho Tajiguas.
27 After the acquisition of the El Rancho Tajiguas, MAZ executed a Right-of-Way
28 Grant and then an Amendment to the Right-of-Way Grant allowing for the

1 operation of an oil pipeline of portions of its land. El Rancho Tajiguas was and is
2 comprised of approximately 24 legal parcels of land, or Lots, and MAZ
3 subsequently transferred some of the Lots to limited liability companies. MAZ
4 kept its interest in Lot B and Lot J and transferred Lot X to Grey Fox, Lot H to
5 Bean Blossom, and Lot C to Winter Hawk.

6 4. Grey Fox, MAZ, Bean Blossom, and Winter Hawk (the “Plaintiff
7 Entities”) voluntarily undertook the burdens and risks associated with this lawsuit
8 to seek compensation for the claims alleged herein. In doing so the Plaintiff Entities
9 understood that being a plaintiff in this case entailed, among other things: having
10 their names in a publicly-filed complaint; ongoing engagement with their legal
11 team; participating in discovery, including a possible deposition; participating in a
12 potential trial; and acting at all times in the best interest of the class, including in
13 any mediation or settlement. I believe that without the Plaintiff Entities stepping
14 forward to serve as Class representatives, Defendants would not compensate the
15 people and businesses they harmed.

16 5. The Plaintiff Entities have participated actively in this lawsuit since
17 January 20, 2016. Representatives of the Plaintiff Entities, including John
18 Vallance, David Tresize, and I met with Class Counsel in person or communicated
19 with them by phone and e-mail to stay informed, to discuss motion practice,
20 amendments to the complaint, discovery requests and responses, the district court’s
21 rulings, and litigation strategy, including during the mediation and settlement
22 negotiations. On behalf of the Plaintiff Entities, I will continue to do so during this
23 settlement approval process, as needed.

24 6. Among other tasks, representatives of the Plaintiff Entities helped
25 counsel draft the complaint by describing to them the story of the Plaintiff Entities
26 and relevant facts and events. As part of that process, the Plaintiff Entities reviewed
27 and provided counsel with documents and information. The Plaintiff Entities
28 reviewed the draft complaint before it was filed and offered opinions, expertise, and

1 corrections on the section relevant to the Plaintiff Entities.

2 7. Grey Fox, MAZ, Bean Blossom and Winter Hawk searched for,
3 preserved, and provided to Class Counsel any documents that were pertinent to the
4 case multiple times over multiple years, understanding that Defendant would
5 receive copies of documents to which they were entitled, including private and
6 financially sensitive documents. The Plaintiff Entities also reviewed or discussed
7 with Class Counsel numerous other documents related to this case, including
8 documents shared in discovery, the proposed settlement, and the settlement
9 approval papers. The Plaintiff Entities worked closely with Class Counsel to
10 respond to written discovery requests as well.

11 8. Various representatives of Grey Fox, MAZ, Bean Blossom, and
12 Winter Hawk were deposed by Defendant Plains on April 21, 2021, April 29, 2021,
13 November 1, 2021, March 8, 2022, May 30, 2022, May 31, 2022, June 3, 2022.
14 These included John Vallance, David Trezise, and Christopher Jacobs. As part of
15 that process, these individuals took substantial time out of their schedules to
16 prepare and meet with counsel, attend the deposition itself, and later review the
17 transcript for errors. These Depositions involved issues relevant to the Class case.

18 9. I estimate that representatives on behalf of the above entities devoted
19 more than 130 hours to the work on behalf of the Class on this case since 2016,
20 including by working on the tasks described above.

21 10. I have reviewed the Settlement and the [Proposed] Plan of Allocation.
22 I strongly support them, as I believe they represent an excellent and fair resolution
23 of this case, while also avoiding the delays and risks of additional litigation, trial,
24 and appeals.

25 11. The Plaintiff Entities have never been promised any compensation for
26 performing their duties as plaintiffs and class representatives, including any service
27 award, and I am aware of no interest of mine or of any of the Plaintiff Entities in
28 this litigation that conflicts with the interests of other Class members. I understand,

1 however, that Class Counsel also believe that the contributions Grey Fox, MAZ,
 2 Bean Blossom, and Winter Hawk have made to this litigation justify a service
 3 award and intend to request that the Court award Grey Fox, MAZ, Bean Blossom,
 4 and Winter Hawk a total of \$20,000 collectively for the time and efforts expended
 5 on behalf of the Class, which the Court may or may not approve at its discretion.
 6 The Plaintiff Entities support Class Counsel’s request for a service award of
 7 \$20,000 in recognition of the Plaintiff Entities work on this action over the last
 8 seven years.

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

11 Executed this 9th day of August 2024, at Winnemucca, Nevada.

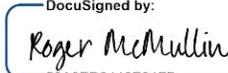
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 13 By: 
 14 Roger McMullin
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EXHIBIT 6

1
2 **UNITED STATES DISTRICT COURT**
3 **CENTRAL DISTRICT OF CALIFORNIA**

4 GREY FOX, LLC, *et al.*,

5 Plaintiffs,

6 v.

7 PLAINS ALL AMERICAN PIPELINE,
8 L.P. *et al.*,

9 Defendants.

Case No. 2:16-CV-03157-PSG-JEM

**SUPPLEMENTAL DECLARATION
OF GINA INTREPIDO-BOWDEN
REGARDING CLASS NOTICE
IMPLEMENTATION**

Honorable Philip Gutierrez

10
11 I, Gina Intrepido-Bowden, declare as follows:

12 1. I am a Vice President at JND Legal Administration (“JND”). This Declaration
13 is based on my personal knowledge, as well as upon information provided to me by
14 experienced JND employees and, if called upon to do so, I could and would testify
15 competently thereto.

16 2. I previously submitted the Declaration of Gina Intrepido-Bowden re:
17 Settlement Notice Program (“Intrepido-Bowden Decl.”) filed April 9, 2024, ECF No. 303-
18 2 and the Declaration of Gina Intrepido-Bowden re: Settlement Notice Program
19 Implementation (“Notice Decl.”) filed July 5, 2024, ECF No. 365.¹ JND is serving as the
20 Settlement Administrator in the above-captioned action for the purposes of administering
21 the Settlement Agreement, filed April 9, 2024, ECF No. 303-1 (“Settlement Agreement”),
22 preliminarily approved by the Court in its Order Granting Preliminary Approval of
23 Proposed Settlement, filed May 1, 2024, ECF No. 325 (“Preliminary Approval Order”).

24 3. This Declaration is being filed to further update the Court regarding Class
25 Notice implementation and Settlement administration.

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27 ¹ All capitalized terms not defined herein have the meanings given to them in the Intrepido-
28 Bowden Decl. and Notice Decl., unless otherwise indicated.

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SETTLEMENT WEBSITE AND EMAIL ADDRESS

4. As of August 1, 2024, there were 784 total views of the Settlement Website pages and documents and 468 unique visitors to the Settlement Website. JND will continue to maintain the Settlement Website throughout the Settlement administration process and update the Settlement Website in real time with relevant motions, orders, and other documents filed to the docket in this action

5. As of August 1, 2024, JND has handled 22 email communications received to the Settlement Email Address. JND will continue to maintain the Settlement Email Address throughout the Settlement administration process.

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TOLL-FREE NUMBER

6. As of August 1, 2024, JND has received 27 calls to the Interactive Voice Response (“IVR”) number. JND will continue to maintain the toll-free IVR number and assist Class Members throughout the Settlement administration process.

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EMAIL NOTICE

7. On July 12, 2024, JND emailed a Long-Form Notice to one additional email address provided by Class Counsel.

8. Of the 168 Class Member email addresses sent Email Notice, 147 or 87.5% were deemed delivered and 21 or 12.5% were deemed undeliverable.

MAIL NOTICE

9. As of July 9, 2024, 8 Long-Form Notices mailed by USPS First Class Mail had been returned to JND as undeliverable with no forwarding address. JND then performed advanced address research for the 8 undeliverable Long-Form Notices and re-mailed 2 Long-Form Notices to 2 updated addresses that were deemed delivered.

EXHIBIT 7



ELM Solutions

2023 Real Rate Report[®]

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



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Section I: High-Level Data Cuts

Cities By Matter Type

2023 - Real Rates for Associate and Partner

Trend Analysis - Mean

City	Matter Type	Role	n	First Quartile	Median	Third Quartile	2023	2022	2021
Jackson MS	Non-Litigation	Associate	21	\$55	\$55	\$176	\$125	\$159	\$125
Jacksonville FL	Litigation	Partner	10	\$269	\$333	\$478	\$352	\$394	\$543
Kansas City MO	Litigation	Partner	59	\$415	\$466	\$596	\$511	\$473	\$450
		Associate	48	\$277	\$350	\$385	\$331	\$316	\$316
	Non-Litigation	Partner	103	\$428	\$522	\$625	\$530	\$526	\$487
		Associate	85	\$260	\$338	\$385	\$335	\$324	\$312
Las Vegas NV	Litigation	Partner	11	\$296	\$350	\$453	\$380	\$405	\$450
		Non-Litigation	Partner	16	\$420	\$502	\$601	\$502	\$450
		Associate	16	\$250	\$282	\$348	\$300	\$305	\$297
Little Rock AR	Non-Litigation	Partner	12	\$215	\$250	\$315	\$284	\$260	\$256
Los Angeles CA	Litigation	Partner	302	\$525	\$840	\$1,159	\$867	\$815	\$739
		Associate	353	\$431	\$680	\$880	\$674	\$650	\$606
	Non-Litigation	Partner	438	\$574	\$857	\$1,198	\$905	\$941	\$904
		Associate	492	\$452	\$635	\$840	\$660	\$697	\$715