

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No.: 12-21678-CIV-LENARD/GOODMAN

LAURA EGGNATZ and KATRINA GARCIA,
individually, and on behalf of all others similarly situated,

Plaintiffs,

vs.

KASHI COMPANY, a California
Corporation,

Defendants.

**JOINT DECLARATION OF CLASS COUNSEL IN SUPPORT OF
PLAINTIFFS' MOTION FOR ATTORNEYS' FEES AND COSTS**

1. We, Gillian L. Wade, Angela V. Arango-Chaffin, L. DeWayne Layfield, and Michael T. Fraser, are Class Counsel and counsel of record for Plaintiffs Katrina Garcia and Laura Eggnatz (“Plaintiffs” or “Class Representatives”), and we respectfully submit this Joint Declaration in support of Plaintiffs’ Motion for Attorneys’ Fees and Costs. Except as otherwise noted, we have personal knowledge of the facts set forth in this Declaration, and could testify competently to them if called upon to do so.

2. Pursuant to the Stipulation of Settlement (ECF 179-1) (the “Agreement”), Class Counsel are entitled to request that the Court award attorneys’ fees in the amount of \$1,500,000 and up to \$180,000 in litigation costs and expenses incurred. Agreement at § VIII(A). Kashi will also not oppose Service Awards of \$5,000 for each of the two Class Representatives.

3. As indicated in the Court-approved Notice disseminated to the Class, and consistent with standard class action practice and procedure, Class Counsel request a fee amounting to \$1,500,000 and reimbursement of \$168,204 in litigation costs and expenses incurred. Class Counsel also seek Service Awards in the amount of \$5,000 for each of the two Class Representatives, to compensate the Class Representatives for their time, effort and risks they undertook in prosecuting the Litigation.

4. Class Counsel have extensive experience and expertise prosecuting complex class actions, including consumer actions similar to the instant case. We have a thorough understanding of the practical and legal issues Plaintiffs would continue to face taking this case to verdict, based on our collective experience in other consumer fraud class actions and the procedural posture of this Litigation at the time settlement was reached. Plaintiffs faced a number of serious challenges, class certification, the materiality of the ‘All Natural’ claims and calculating class-wide damages

chief among them.

5. Plaintiffs allege the marketing and labeling of certain Kashi food products as “All Natural,” “100%,” and containing “Nothing Artificial” is false and deceptive because the Products were made with genetically modified organisms (“GMOs”) and allegedly synthetic ingredients such as Pyridoxine Hydrochloride, Alpha-Tocopherol Acetate, Hexane-Processed Soy ingredients and Calcium Pantothenate (the “Challenged Ingredients”).

6. On May 3, 2012, Plaintiffs Katrina Garcia and Laura Eggnatz filed a class action complaint against Defendant and its parent company, Kellogg Company (“Kellogg”), in this District seeking monetary damages, declaratory relief and injunctive relief. [ECF 1]. On July 7, 2012, Kashi and Kellogg jointly moved to dismiss Plaintiffs' original complaint under Federal Rule of Civil Procedure 12(b)(6), and after the motion was fully briefed [ECF 7, 13], this action was consolidated with Julie Martin’s case (originally filed in the Northern District of California) [ECF 30]. Plaintiffs filed an Amended Consolidated Class Action Complaint on February 1, 2013 [ECF 33], which Kashi again moved to dismiss [ECF 37].

7. On October 18, 2013, while Kashi’s Rule 12(b)(6) motion was pending [ECF 7, 45], Plaintiffs filed a Second Amended Consolidated Class Action Complaint (the “SAC”). [ECF 58]. Kashi moved to dismiss for the third time on December 2, 2013. [ECF 71]. On September 5, 2014, the Court entered an Order granting in part and denying in part Kashi’s motion to dismiss Plaintiffs’ SAC. [ECF 99]. The Court held Plaintiffs’ claims were not preempted by federal law, and that the primary jurisdiction doctrine did not require referral of claims to the Food and Drug Administration (FDA). *Id.* at 16. The Court also rejected Kashi’s efforts to dismiss Plaintiffs’ claims for FDUTPA violations, negligent misrepresentation, breach of express warranty and

money had and received. *Id.* at 32-48. The Court did, however, dismiss Kellogg as a party defendant and Plaintiffs' claims for breach of implied warranty and declaratory judgment, and limited Plaintiffs' claims to the eight Kashi products Plaintiffs actually purchased by the Class Representatives. *Id.* at 1392-94.

8. On January 16, 2015, Plaintiffs filed a motion for class certification [ECF 118] and Kashi filed a motion for summary judgment [ECF 142]. Briefing on these motions was complete on March 2, 2015. [ECF 163, 166].

9. Trial was set to commence June 1, 2015. [ECF 100].

10. The Parties exchanged written discovery and Class Counsel reviewed thousands of documents and dozens of commercials produced by Defendant. Plaintiffs also responded to written discovery and sat for contentious half-day depositions.

11. The Parties also completed expert discovery. Plaintiffs retained the following key liability experts: (1) Dr. Thomas Maronick, a marketing expert who designed and implemented a consumer survey regarding the Challenged Ingredients and Kashi's labels; (2) Dr. Charles M. Benbrook, Ph.D., an agricultural technology expert who opined on whether products containing the Challenged Ingredients are natural and/or artificial; and, (3) economist David Sharp, Ph.D., who devised two methods for calculating class-wide damages.

12. Defendant disclosed three rebuttal experts: (1) Dr. Itamar Simonson (offering a rebuttal opinion to Dr. Maronick); (2) Dr. Roger A. Clemens (offering a rebuttal opinion to Dr. Benbrook); and, (3) Dr. Michael P. Emmert (offering a rebuttal opinion to Dr. Sharp). Defendant deposed Drs. Maronick and Benbrook.

13. The Parties settled just days before the deadline to file motions *in limine*, thus,

Class Counsel had already drafted motions and were engaged in full trial preparation at the time the parties reached the Settlement.

14. On December 12, 2012, the Parties engaged in preliminary settlement discussions via private mediation with the Honorable Judge J. Richard Haden (Ret.). Agreement § I(K). The Parties did not reach an agreement. The Court referred the Parties back to mediation, which occurred on June 4, 2014 before Judge Haden. In advance of the negotiations, Kashi provided Plaintiffs with documents and information regarding the Products, the Challenged Ingredients and the Products' national sales during the class period. The Parties did not reach an agreement at the second mediation.

15. After the close of fact and expert discovery, fully briefed motions for class certification summary judgment, and an in-person settlement meeting in Chicago with Defendant's lead counsel, the parties attended another full day of formal mediation before Judge Haden on March 24, 2015. [ECF 160, 163, 166]. At the final mediation, the Parties had the benefit of full fact and expert discovery, including expert reports and depositions, document production, and Class Representative and Rule 30(b)(6) depositions.

16. With the assistance of Judge Haden, the Parties reached an agreement to resolve this Litigation on a national class basis (except California residents, in light of the *Astiana* settlement). At all times throughout the mediation proceedings and settlement discussions, the negotiations were adversarial, non-collusive and at arm's length.

17. The Parties executed the Agreement on June 5, 2015, memorializing the agreement reached at mediation.

18. The Court granted Preliminary Approval of the Settlement on September 4, 2015. [ECF 183]. In its Order, the Court conditionally certified the Settlement Class, appointed Class Counsel and ordered the dissemination of Notice.

19. The Settlement involves both monetary and injunctive relief. It obliges Defendant to pay \$3.99 million in cash to the Settlement Class. Agreement § IV(A)(2). The proceeds of the Settlement, less the costs of settlement administration, attorneys' fees, expenses and Service Awards, will be distributed to claiming Settlement Class Members. *Id.*

20. Class Members who make valid claims accompanied by written proof of purchase (i.e. receipts) will receive a full reimbursement for those Products from the Settlement. Agreement § IV(A)(1)(a). There is no limit to the number of units for which Class Members can be reimbursed where they submit receipts. *Id.* For Class Members who do not submit a proof of purchase with their claims, Kashi will reimburse \$0.55 (fifty-five cents) per package for every Product purchased during the Class Period, with a maximum recovery of fifty (50) boxes, for a total recovery of \$27.50. *Id.* at § IV(A)(1)(b). The total amount of money available to pay Class Members' eligible claims must be at least \$2 million. *Id.* at § IV(A)(1)(a). Claimants' reimbursements may be proportionately modified up or down, on a per-unit basis, depending on the amount of claims made. *Id.* at § IV(A)(3). It is our understanding, based on the information provided to us by the Claims Administrator, 96,214 claims, totaling approximately \$955,750 have been submitted.

21. Under the Settlement, Kashi agrees not to oppose Class Counsel's request for attorneys' fees of \$1.5 million, plus reimbursement of litigation costs and expenses up to \$180,000. *Id.* at § VIII(A). Kashi will also not oppose Service Awards of \$5,000 for each of the

two Class Representatives. The Service Awards, attorneys' fees and costs will be paid from the Settlement payment by Kashi. *Id.* at §§ IV(A)(2)(b), VIII(A).

22. In addition to this monetary relief, Defendant agreed to significant and valuable injunctive relief—removal of the “All Natural,” “100% Natural,” and “Nothing Artificial” labels on Products containing any of the Challenged Ingredients, unless such ingredient is approved or determined as acceptable by a federal agency or controlling regulatory body to be designated as “natural.” *Id.* at IV(C)(1). Kashi also agreed to remove the ‘All Natural’ claims from packaging in *Astiana v. Kashi Company*, No. 3:11-CV-01967, ECF 242 (C.D. Cal. September 2, 2014) (entering judgment and granting final approval). However, the settlement reached in *Astiana* applies only to California residents and does not mention removing the claims from packaging distributed nationally.

23. Kashi will also provide Plaintiffs' Counsel with compliance information regarding the Non-GMO Project Verified label designations on certain Kashi products on a bi-annual basis for three years. *Id.* at § IV(C)(2).

24. In the context of food labeling class action settlements, the type of business reform injunctive relief we achieved in the Settlement is rare and provides a lasting benefit to the Class and the public years beyond the date of settlement and distribution of monetary relief.

25. In total, Class Counsel has billed 3,708 hours, totaling approximately \$1,693,788.75 in lodestar. As set forth in detail below, Class Counsel's lodestar is reasonable.

26. The hourly rates of Class Counsel in this Litigation (\$550 to \$575 for partners and \$275 to \$450 for associates) are comparable to those approved in other cases in Florida and this District. *See Exhibit B* at pages 2, 4 (2013 National Law Journal Billing Survey, listing a Miami

law firm's average billing rates as \$350 to \$611 for partners and \$175 to \$425 for associates and Tampa law firm's average billing rates between \$455 and \$840 for partners).

27. The hours billed by Class Counsel in the Litigation are reasonable. As set forth below, prosecuting this action entailed extensive motion practice, fact and expert discovery and trial preparation.

Milstein Adelman, LLP

28. Milstein Adelman, LLP ("MA") is a plaintiff law firm comprising twenty-three lawyers, based out of Santa Monica, California. MA has more than twenty years of experience leading and handling consumer class actions, mass torts and complex litigation. MA has represented thousands of plaintiffs in over 250 complex actions, and has recovered over \$500 million for its clients. The class action attorneys at MA specialize in consumer products litigation and have particular expertise in cases involving false advertising and consumer deception. The firm has been appointed as lead or co-lead class counsel in several matters, including: *Morales v. Kraft Foods Group, Inc.*, No. LA CV 14-04387 (PJWx); (C.D. Cal. 2015); *Arreguin v. Telebrands* (SBSC CVRS 13307798) (2015); *Paul v. Wine.com* (SFSC CGC13534734) (2015); *Toney v. Just Fabulous* (LASC BC533943) (2015); *McCrary v. The Elations Company, LLC*, (CDCA 13CV00242) (2014); *Smith v. Intuit, Inc.* (NDCA 1200222) (2013); *Solomon v. Ramona's Mexican Food Products, Inc.* (LASC BC463914) (2013); *Saenz v. SEIU United Healthcare Workers West* (ACSC RG09478973) (2013); *Griar, et al., v. Glaxosmithkline, Inc. et al.* (LASC BC288536) (2012); *In re Budeprion XL Marketing and Sales Practices Litigation* (MDL No. 2107) (2012); *Keller v. Gaspari Nutrition, Inc.*, (CDCA 11CV06158) (2011); *Weeks et al v. Kellogg, et al.*, (CDCA 09CV08102) (2011); *Williams, et al. v. Biotab Nutraceuticals, Inc.* (LASC BC414808) (2010); *Wally*

v. CCA Industries, Inc. (CASC BC422833) (2010); *Fallon v. E.T. Browne Drug Co., Inc.* (LASC BC 411117) (2009); *Oliver, et al. v. Atmos Corporation* (SJSC CV0119362) (2009); *Salcido v. Iomedix* (LASC BC 387942) (2009); *Deist, et. al. v. Viking Industries,* (SJSC CV 025771) Apr. 9, 2009); *Ceballos v. Fuze Beverage, LLC* (LASC BC 394521) (2009); *Heath, et al. v. County of San Bernardino,* (EDCA 06CV00411) (2008); *Klyachman, et al. v. The Vitamin Shoppe, et al.* (NJSC L173907) (2008); *Shaffer v. Continental Casualty Company, et al.,* (CDCA 06CV02235) (2008) (class certification aff'd. at D.C. 06CV02235); *Klotzer, et al. v. International Windows* (SCSC FCS021196) (2007); *LaRosa v. Nutramerica Corp.* (“Trimspa”), (LASC BC309427) (2007); *Abigana, et al. v. Rylock Company Ltd.* (ACSC 2002 076625) (2006); *Hufschmidt v. Allstate Insurance Company* (LASC BC291782) (2004).

29. Gillian L. Wade is a partner at MA leading the class action department. She has been with MA for over ten years and became a partner in 2010. Ms. Wade graduated from the University of California, San Diego (B.A. Political Science, 1999) and Pepperdine University (J.D. 2003). She also graduated *magna cum laude* from Pepperdine law school, received the John Purfield Memorial Scholarship for academic excellence, and served as a staff writer for the Pepperdine Law Review. Ms. Wade has been admitted to practice law in California since 2003.

30. Ms. Wade’s practice focuses on representing plaintiffs in complex litigation and consumer class actions, with particular emphasis on consumer fraud involving and actions arising under various state consumer protection statutes, including the Florida Deceptive Trade Practices Act (“FDUTPA”). She has played integral roles as lead and co-lead counsel in class actions recovering millions of dollars for consumers. Ms. Wade has had significant involvement in the resolution of over 50 consumer fraud class actions and has been appointed lead class counsel or

co-lead in several state and federal class actions throughout the United States, including: *Toney v. Just Fabulous* (Los Angeles Superior Court Case No. BC533943) (2015) (representing “VIP” members of JustFab regarding overcharges for restocking fees and monthly auto-billing); *Paul v. Wine.com* (San Francisco Superior Court Case No. CGC-13-534734) (2015) (alleging violations of the auto-purchase renewal statute and misleading “free shipping” representations); *Arreguin v. Telebrands* (San Bernardino Superior Case No. CVRS 13307798) (2015) (representing purchasers of defective “Pockethose” product); *McCrary v. The Elations Co., LLC* (EDCV 13-00242 JGB) (C.D. Cal. 2014) (representing California purchasers of Elations “joint health supplement beverage” alleging false claims of “clinical-proof” on product labeling); *Solomon v. Ramona’s Food Products* (LASC No. BC 451080) (2014) (representing purchasers of mislabeled food products); *Smith, et al. v. Intuit, Inc.* (5:12-cv-00222-EJD) (N.D. Cal. 2014) (alleging fraudulent charges associated with Turbo Tax); *Saenz v. SEIU United Healthcare Workers-West* (Alameda Super. Ct. No. RG09478973) (2013) (representing individuals against labor union for data security breach); *In re Budeprion XL and Marketing and Sales Practices Litigation* (MDL No. 2107) (E.D. Pa. 2012) (co-lead class counsel in centralized proceeding alleging fraudulent omissions on the labeling of generic anti-depressant); *Keller v. Gaspari Nutrition, Inc.* No. 2:11-cv-06158-GAF (C.D. Cal. 2012) (representing purchasers of testosterone pills); *Pabst v. Genesco, Inc.*, 3:11-cv-01592-SI (N.D. Cal. 2012) (representing California consumers regarding privacy violation); *Wike v. HCG Platinum, LLC.* (LASC. No. BC451080) (2012) (representing purchasers of the dietary supplement HCG Platinum); *Litwin v. iRenew, et al.*, LASC. No. BC447114 (representing purchasers of iRenew brand bracelet) (2011); *Weeks, et al. v. Kellogg, et al.*, CV-09-08102 (MMM) (C.D. Cal. 2010) (representing purchasers of food products regarding

alleged false “immunity” claims); *Thompson, et al., v. Biotab Nutraceuticals, Inc.* (LASC No. BC414808, 2010) (representing national class of purchasers of dietary supplement for male enhancement); *Fallon v. ET Browne Drug Corp.* (LASC No. 411117) (2009) (representing class of purchasers of mislabeled cosmetic products); *Shaffer v. Continental Casualty Company* (2:06-cv-2235-PSG) (C.D. Cal. 2008) (representing national class of elderly insureds alleging consumer fraud and financial abuse of the elderly in the sale and marketing of long term care insurance policies); *Heath, et al. v. County of San Bernardino* (5:06-CV-00411-VAP) (C.D. Cal. 2008) (representing limited term firefighters for civil rights and FLSA violations).

31. Ms. Wade is involved in multiple class actions centralized by the MDL Panel throughout the Country and has been appointed to the Plaintiffs’ Executive Committees in several federal class actions centralized by the MDL Panel, including: *In re Nutramax Cosamin Marketing and Sales Practices Litigation* (MDL No. 2489)(D. Md.); *In re Pom Wonderful Marketing and Sales Practices Litigation* (MDL No. 2199)(C.D. Cal.); *In re Budeprion XL Marketing and Sales Practices Litigation* (MDL No. 2107)(E.D. Pa.); *In re Liberty Refund Anticipation Loan Litig.* (MDL No. 2334) (N.D. Ill.) and *In re H&R Block Refund Anticipation Litig.* (MDL No. 2373) (N.D. Ill.).

32. Prior to joining Milstein Adelman, Ms. Wade was a litigation associate at Jones Day where she defended corporations in consumer fraud class actions, ERISA cases, and actions arising under the Fair Credit Reporting Act.

33. Sara D. Avila is also member of MA’s class action and complex litigation practice group. Her practice focuses on representing plaintiffs in complex litigation and consumer class actions, with particular emphasis on consumer fraud actions involving false and misleading

advertising, food labeling and actions arising under various state consumer protection statutes, including FDUTPA. Ms. Avila has had significant involvement in over 30 consumer class actions. She also has experience representing plaintiffs in actions stemming from consumer deception, habitability statutes, employment violations, bad faith insurance disputes and antitrust actions. Ms. Avila has been appointed class counsel in several state and federal class actions, including *Toney v. Just Fabulous* (Los Angeles Superior Court Case No. BC533943) (2015); *Arreguin v. Telebrands*, No. CV-RS-13307798 (San Bernardino Superior Court 2015); *Paul v. Wine .com*, No. CG-C-13534734 (San Francisco Superior Court 2015); *McCrary v. The Elations Company, LLC*, No. 13-cv-00242 (C.D. Cal. 2015); *Saenz v. SEIU United Healthcare Workers-West*, No. RG09478973 (Alameda Superior Court 2013); *Weeks v. Kellogg*, CV-09-08102 (MMM) (C.D. Cal. 2011); and, *Pabst v. Genesco, Inc.*, 3:11-cv-01592-SI (N.D. Cal. 2011). Ms. Avila has been admitted to practice law in California since 2009.

34. In total, MA has billed 2,153.25 hours, totaling \$992,031.25 in fees to date.

35. Below is a summary of hours spent by MA in this Litigation:

Timekeeper	Hours to Date	Rate Per Hour	Total Amount Billed
Mark A. Milstein (Partner)	36.0	\$ 575.00	\$ 20,700.00
Gillian L. Wade (Partner)	785.5	\$ 550.00	\$ 417,175.00
Sara D. Avila (Associate)	1182.5	\$ 450.00	\$ 532,125.00
Legal Assistant/ Paralegal	176.25	\$ 125.00	\$ 22,031.25
TOTAL	2153.25		\$ 992,031

36. Mr. Milstein routinely bills at \$750 per hour and Ms. Wade typically bills at \$650 per hour, but reduced their rates for purposes of this Motion only, to conform to the partner rates routinely awarded in the Miami-Dade County area. *See* Exhibit B at pages 2, 4. Indeed, Courts in other actions across the Country have approved these and higher rates for Milstein Adelman attorneys in the past. *See, e.g., Toney v. Just Fabulous, Inc.*, No. BC533943 (Los Angeles Superior Court 2015) (approving rate of \$650/hour for Ms. Wade; \$425 for associates); *Paul v. Wine.com*, No. 1CGC-13-534734 (San Francisco Superior Court 2015) (approving rate of \$650/hour for Ms. Wade; \$425 for associates); *Arreguin v. Telebrands*, No. CVRS 13307798 (Superior Court of San Bernardino 2014); *Solomon v. Ramona's Food Products*, No. BC-451080 (Los Angeles County 2013) (approving rate of \$550 per hour for Ms. Wade and \$350 for associates); *Smith v. Intuit*, No. 5:12-cv-00222-EJD (N.D. Cal. 2013) (approving rate of \$550 for partners (including Ms. Wade) and \$295 for associates in); *Keller v. Gaspari Nutrition, Inc.*, No. 11-06158 (C.D. Cal. 2012) (approving rate of \$550 per hour for Ms. Wade and \$295 per hour for associates); *Hayes v. Airtrade Int'l, Inc.*, No. 10-177539 (Santa Clara County 2012) (approving rate of \$550 for partners (including Ms. Wade) and \$275 for associates); *Pabst v. Genesco, Inc.*, 3:11-cv-01592-SI (N.D. Cal. 2012) (approving rate of \$500 for partners (including Ms. Wade) and \$350 for associates (including Ms. Avila)); *Weeks v. Kellogg*, No. 09-8102, ECF 157 (C.D. Cal. 2011) (approving rate of \$550/hour for Ms. Wade and \$350/hour for associates (including Ms. Avila)).

37. MA's hours spent were reasonable. Below is a summary of hours worked by Class Counsel in this Litigation as of December 10, 2015:

- a. extensive legal research into the viability of the legal claims to be asserted

- on behalf of Plaintiffs and the Class;
- b. communicating with and interviewing Plaintiffs regarding their potential claims against Defendant;
- c. routinely communicating with Plaintiffs throughout the lifetime of the Litigation, including reports and discussions regarding status of case, their discovery responses and depositions, mediation and the Settlement;
- d. preparing initial complaint;
- e. meeting and conferring with counsel for Defendant throughout the Litigation and preparing stipulations regarding same;
- f. drafting and editing Second Amended Consolidated Complaint (SAC);
- g. opposing Defendant's Rule 12(b)(6) Motion to Dismiss SAC;
- h. engaging in meeting of counsel pursuant to Rule 26(f) and preparing Joint Rule 26(f) Discovery Plan;
- i. reviewing the Court's Standing Order in this Litigation;
- j. reviewing Court's various Scheduling Orders in this Litigation;
- k. meeting and conferring with counsel for Defendant regarding Stipulation for Protective Order; preparing same;
- l. drafting written discovery (including multiple sets of interrogatories, requests for admissions and document requests) and deposition notice per Rule 30(b)(6);
- m. performing extensive legal research regarding motions to quash subpoenas and motions to compel responses to subpoenas;

- n. drafting and editing responses to written discovery propounded by Defendant on Plaintiffs;
- o. reviewing and analyzing thousands of pages of documents produced by Defendant, including advertisements, consumer surveys and internal communications, memoranda, presentations, and scientific studies related to the Challenged Ingredients;
- p. performing extensive legal research regarding Rule 23 certification of claims under FDUTPA, including monitoring activity in *Karhu* appeal;
- q. drafting, reviewing and revising Motion for Leave to File 4AC and supporting documents; reviewing Opposition and performing additional legal research; preparing Reply to Opposition and supporting documents;
- r. performing factual research and investigation regarding Defendant's supporting documents and evidence filed with Defendant's Opposition to Motion for Class Certification; perform extensive legal research regarding the Federal Rules of Evidence and evidentiary objections in connection with Rule 23;
- s. investigating Defendant's factual contentions;
- t. in preparing the Motion for Class Certification and mediation, performing extensive research regarding Class Notice and interviewing potential third party claims administrators; reviewed and negotiated cost estimates;
- u. upon reaching the Settlement, communicating with third party claims administrator regarding a myriad of issues regarding Class Notice,

- including estimated cost, form and content of notice, the class action website, publications for print notice, the scope and timeframe of notice; discuss issues regarding specific class member inquiries; communicate with at least two dozen unnamed class members regarding the litigation;
- v. communicating with and interview potential experts and consultants regarding key liability issues; negotiate terms of agreements with experts and prepare/ edit retainers for experts;
 - w. reviewing documents, information and data with Plaintiffs' three liability experts and formulate and refine Plaintiff's legal theories regarding Rule 23 requirements, the elements of Plaintiff's claims under FDUTPA and Kashi's defenses;
 - x. spending significant time preparing for and taking Federal Rule of Civil Procedure 30(b)(6) depositions (including travel to La Jolla, California from Los Angeles, California);
 - y. meeting and conferring with counsel for Defendant regarding trial date and scheduling trial-related deadlines;
 - z. reviewing experts' draft reports and discussing experts' opinions;
 - aa. reviewing and analyzing rebuttal reports served by Defendant's experts;
 - bb. extensive communications, including in-person meetings, with Plaintiffs' experts regarding Defendant's rebuttal experts, summary judgment and trial preparation;
 - cc. spending significant time preparing for and defending the depositions of

Drs. Maronick and Benbrook;

- dd. drafting and revising motions *in limine* (not filed);
- ee. drafting and revising opposition to Defendant's Rule 56 Motion for Summary Judgment and documents in support thereof;
- ff. trial preparation, including creating witness list and exhibit list;
- gg. researching and preparing a detailed mediation briefs; attending mediation with the Honorable J. Richard Haden (Ret.) at JAMS;
- hh. extensive settlement negotiations, with the assistance of Judge Haden;
- ii. preparing for and traveling to Chicago for in-person meeting with Kashi's counsel;
- jj. negotiating many details of the terms of Settlement and the Agreement and exhibits thereto;
- kk. drafting and revising the Motion for Preliminary approval and supporting documents; performing legal research regarding approval of class action settlement in the Eleventh Circuit and this District;
- ll. communicating with DSG regarding Settlement Class Notice, Claim Forms, Settlement Class Notice (including content, timeline, publications, internet notice), the Settlement Website, print notice, and monitoring costs. Receive and review weekly reports regarding claims, opt-outs, website views and responding to various questions from unnamed class members;
- mm. communicating with unnamed class members regarding the

Settlement;

nn. significant coordination with co-counsel regarding case strategy and litigation cost allocations;

oo. drafting and revising the Motion for Service Award for the Class Representatives;

pp. drafting and revising the Motion for Attorneys' Fees and Costs and accompanying documentation; and,

qq. drafting and revising the Motion for Final Approval and accompanying documentation.

38. MA incurred \$156,313.73 in costs and expenses in this Litigation as of December 1, 2015. The categories of expenses for which MA, as detailed below, seeks reimbursement are the type of expenses routinely charged to paying clients in the marketplace and, therefore, the full requested amount should be reimbursed. The expenses include but are not limited to: clerk fees, filing fees, court reporter charges; photocopies; postage and overnight delivery; expert fees and costs; mediation fees; travel expenses (travel to Chicago, Illinois, San Diego and La Jolla, California for depositions and mediation). Below are the costs incurred by MA in this Litigation:

<i>EXPENSE CATEGORY</i>	<i>COST</i>
Clerk Fees, Filing Fees, Court Reporters	\$ 2,016.95
Overnight Mail/ Postage	\$ 367.23
Printing and Reproduction	\$ 1,105.61
Lodging and Transportation	\$ 1,502.28
Mediator Fees	\$ 2,454.16
Expert Witness Fees	\$ 148,867.50
<i>TOTAL</i>	\$ 156,313.73

The Law Offices of L. DeWayne Layfield

39. L. DeWayne Layfield is the sole member of Law Office of L. DeWayne Layfield, is licensed to practice before all courts in the State of Texas, and is admitted *pro hac vice* in the Litigation.

40. Attached hereto as **Exhibit A** is a true and correct copy of the resume for L. DeWayne Layfield and incorporated herein as if set out in its entirety in this paragraph.

41. In total, the Law Office of L. DeWayne Layfield, PLLC worked 193.10 hours, investigating and prosecuting this Litigation. Those hours have a value totaling \$111,032.50 in fees through December 1, 2015.

42. Below is a summary of hours spent by the Law Office of L. DeWayne Layfield, PLLC in this Litigation:

Timekeeper	Hours to Date	Rate Per Hour	Total Amount Billed
L. DeWayne Layfield (Attorney)	193.10	\$575.00	\$111,032.50
TOTAL	193.10	\$575.00	\$111,032.50

43. Mr. Layfield's hourly rate has previously been approved in consumer class action litigation. *See, e.g., Barrett v. Hewlett Packard Company*, No. CJ-2003-967 (District Court for Cleveland County, Oklahoma 2013).

44. The Law Office of L. DeWayne Layfield, PLLC's hours spent were reasonable. Below is a summary of hours worked by the firm in the Litigation:

- a. Approximately 13% reviewing and analyzing case filings

- b. Approximately 24% preparing for and participating in multiple mediations and meetings in an effort to resolve the litigation
- c. Approximately 63% drafting, reviewing, and editing pleadings and case related documents; pre-filing investigation and due diligence; legal research; and communication and coordination with co-counsel regarding case strategy

45. The Law Office of L. DeWayne Layfield, PLLC's incurred \$5,009.53 in expenses, all of which were reasonable. The table below summarizes the expenses incurred by the Layfield firm in this Litigation. The categories of expenses for which the Layfield firm, as detailed below, seeks reimbursement are the type of expenses routinely charged to paying clients in the marketplace and, therefore, the full requested amount should be reimbursed. The expenses include but are not limited to: postage and overnight delivery; mediation fees; travel expenses (\$3,071.08 for transportation and lodging) a mediation in San Diego, California and an in-person meeting with Defendant in Chicago, Illinois.

46. Below are the costs incurred by the Layfield firm in the Litigation:

<i>EXPENSE CATEGORY</i>	<i>COST</i>
Pro hac admission documentation	\$ 18.00
Overnight Mail/ Postage	\$ 25.82
Lodging and Transportation	\$ 3,071.08
Mediator Fees	\$ 1,616.68
Litigation Services	\$ 277.95
<i>TOTAL</i>	\$ 5,009.53

The Chaffin Law Firm

47. The Chaffin Law Firm is a plaintiff's litigation firm based out of Houston, Texas.

The Chaffin Law Firm has more than 40 years of experience representing plaintiffs in complex litigation. Robert A. Chaffin is the senior partner at the Chaffin Law Firm. He is licensed to practice before all courts in the state of Texas and is admitted *pro hoc vice* in this action. Mr. Chaffin graduated *magna cum laude* at the University of Houston Bates College of Law in 1972 where he finished third in his class and served as Associate Editor of the Houston Law Review in 1972.

48. Since 1972 Mr. Chaffin has practiced exclusively in the field of plaintiffs law and has obtained multiple verdicts in excess of \$10,000,000 while also having made successful arguments before the United States Supreme Court in *Griffin vs. Oceanic Contractors, Inc.*, 458 U.S. 564, 102 S Ct. 3245, 73 L.ED.2d 973 (1982), and the Texas Supreme Court in *Chapa v. Garcia*, 848 S.W.2d 667 (Tex. 1992). In addition, Mr. Chaffin has been a featured speaker at the American Association of Justice annual convention as well as Texas Trial Lawyers functions. On multiple occasions Mr. Chaffin has been selected as a “Super Lawyer” and “Top Attorney in Texas” as well as receiving AV+ rating from Martindale Hubbell. Mr. Chaffin has been lead counsel in several oil and gas royalty class action cases in Texas resulting in recoveries for thousands of royalty owners: Civil Suit No. 202576; *Odis W. LeVrier et al v. Union Pacific Resources Group, Inc. et al*; In the 9th Judicial District Court, Parish of Rapides, State of Louisiana and, Cause No. 1998-A-169; *J. Lloyd Woods et al v. Union Pacific Resources Company et al*; In the 123rd Judicial District Court of Panola County, Texas.

49. Angela V. Arango-Chaffin, has been Of Counsel to the Chaffin Law Firm since February 2011. Ms. Arango-Chaffin graduated *magna cum laude* and *phi beta kappa* from Rice University, Houston Texas (B.A. Hispanic Studies, 2007) and *magna cum laude* from the

University of Miami Law School (J.D. 2010). She received the Florence T. Robbins Scholarship, sponsored by Greenberg Traurig, at the University of Miami Law School, and the Dean’s Honor Award for Legal Research and Writing. Ms. Arango-Chaffin has been admitted to practice law in Florida since 2011. Ms. Arango-Chaffin has over four years of experience representing plaintiffs in consumer class action cases involving false advertising and consumer deception, with a particular emphasis on false advertising and consumer fraud involving actions arising under Florida’s Deceptive and Unfair Trade Practices Act.

50. In total, the Chaffin Law Firm billed 683 hours, totaling \$309,775.00 in fees to date.

51. Below is a summary of hours spent by The Chaffin Law Firm in the Litigation:

Timekeeper	Hours to Date	Rate Per Hour	Total Amount Billed
Robert A. Chaffin (Partner)	60	\$575.00	\$34,500
Angela V. Arango-Chaffin (Of Counsel)	623	\$425.00	\$264,775
TOTAL	683		\$299,275

52. Mr. Chaffin routinely charges \$750 per hour, but reduced his rate to \$575 per hour for purposes of this Litigation only, to conform to the partner rates routinely awarded in the Miami-Dade County area. *See Exhibit B at 2, 4.*

53. The Chaffin Law Firm’s hours spent were reasonable. Below is a summary of hours worked by Class Counsel in the Litigation:

- a. extensive legal research into the viability of the legal claims to be asserted on behalf of Plaintiff and the Class;

- b. communicating with and interviewing Plaintiff Garcia regarding her potential claims against Defendant;
- c. routinely communicating with Plaintiff Garcia throughout the lifetime of the Litigation, including reports and discussions regarding status of case, her discovery responses and depositions, mediation and the Settlement;
- d. preparing initial complaint;
- e. Conducting extensive research related to Plaintiffs' claims, including thoroughly reviewing scientific literature regarding whether GMOs can be considered 'natural';
- f. Researching federal policy concerning labeling of food products containing GMOs and marketed as 'all natural';
- g. Significant coordination with co-counsel regarding case strategy;
- h. Drafting and revising the original complaint and all subsequent pleadings;
- i. Reviewing all motions and discussion of the same;
- j. Monitoring and performing extensive legal research and analysis of consumer food labeling class actions throughout the Country;
- k. Drafting and developing Responses in Opposition to Defendant's Motions to Dismiss the original and amended pleadings and drafting oppositions to Defendant's accompanying Requests for Judicial Notice;
- l. Assist with mediation preparation during various stages in the litigation process;
- m. Assisting Plaintiff with her Responses to Defendant's Requests for Production and Interrogatories;

- n. Preparing Plaintiff for deposition and defending said deposition;
- o. Participating in the discovery process, including review of discovery documents and expert reports;
- p. Developing Response in Opposition to Defendant's motion for Summary Judgment;
- q. Reviewing and discussing the Class Certification Motion and Motion for Preliminary Approval;
- r. Participating in settlement discussions;

Law Offices of Howard W. Rubinstein, P.A.

54. Michael T. Fraser has been of counsel with the Law Offices of Howard W. Rubinstein, P.A. ("LOHWR") since June, 2014. Mr. Fraser graduated from Stetson University, (B.A. English, 2005) and Nova Southeastern University (J.D. 2009). He graduated *cum laude* from NSU law school, where he received numerous academic awards, served on the Nova Trial Association, the Moot Court Board, and as the Editor-in-Chief of *Nova Law Review*. Mr. Fraser has been admitted to practice law in Florida since 2010 and in California since 2011. Mr. Fraser's practice focuses on representing plaintiffs in complex litigation and consumer class actions, with particular emphasis on consumer fraud involving and actions arising under various state consumer protection statutes, including FDUTPA. Mr. Fraser is involved in multiple class actions either centralized or pending centralization by the MDL Panel throughout the Country. Prior to joining, as of counsel, LOHWR, Mr. Fraser was a litigation associate defending professionals and governmental organizations at two different firms located in the State of Florida.

55. Benjamin Lopatin is former Managing Partner at the Law Offices of Howard W. Rubinstein, P.A., a role he held from 2012 to 2014. Mr. Lopatin focuses his practice on civil litigation, primarily involving class actions, consumer protection, unfair competition, false advertising, product liability, food law, and privacy law. Mr. Lopatin graduated from the State University of New York at Buffalo (B.S. Business Administration 2005). He also graduated *cum laude* from the Shepard Broad Law Center at Nova Southeastern University, in Fort Lauderdale, Florida (J.D. 2009), where he received an honors award at graduation for his outstanding *pro bono* service in the community. During law school, Mr. Lopatin served as the Marketing Editor for *Nova Law Review*, on the executive boards for several student organizations and as a Research and Teaching Assistant for Professor Kimberley Hausbeck, where he assisted first year law students in the area of legal research and writing. Mr. Lopatin also provided research and editorial assistance to Professor Hausbeck in a published article, *The Little Engine That Could: The Success of the Stewardship Contracting Authority*, 32 WM. & MARY ENVTL. L. & POL'Y REV. 33 (2007). After law school, Mr. Lopatin attended and graduated from DePaul College of Law in 2011, with his Master of Laws (LL.M.) in Intellectual Property, where he was selected to be a member of the Phi Kappa Phi honors society. Mr. Lopatin has litigated numerous consumer protection class actions, and was appointed Class Counsel in the following cases: *Rappaport v. Jamba Juice Co.*, No.: CGC-12-521091 (San Francisco Superior Court) (consumer protection class action regarding misleading advertising of Jamba Juice beverage additive); *Klacko, et al v. Diamond Foods, Inc.*, Case No. 14-80005-BB (S.D. Fla.) (consumer protection class action regarding Kettle Chips labeled as being "All Natural" but containing unnatural, synthetic, artificial, and/or genetically modified ingredients); and *Moore v. GNC Holdings, Inc.*, No.

12-61703 (S.D. Fla.) (consumer protection class action regarding failure to warn of known dangers on the labeling of a dietary supplement). Mr. Lopatin is admitted to practice law in the State of California and numerous District Courts, including all District Courts in California, the District of Colorado, and the Northern District of Illinois (General Bar).

56. In total, LOHWR billed 678.8 hours, totaling \$291,450.00 in fees to date.

57. Below is a summary of hours spent by LOHWR in this Litigation:

Timekeeper	Hours to Date	Rate Per Hour	Total Amount Billed
Benjamin M. Lopatin (former Managing Partner)	492	\$ 450.00	\$221,400.00
Michael T. Fraser (Of Counsel)	186.8	\$ 375.00	\$70,050.00
TOTAL	678.8		\$291,450.00

58. The Law Office of Howard W. Rubinstein, P.A.’s hours spent were reasonable.

Below is a summary of hours worked by LOHWR in the Litigation:

- a. extensive legal research into the viability of the legal claims to be asserted on behalf of Plaintiff and the Class;
- b. communicating with and interviewing Plaintiff Eggnatz regarding her potential claims against Defendant;
- c. routinely communicating with Plaintiff Eggnatz throughout the lifetime of the Litigation, including reports and discussions regarding status of case, her discovery responses and depositions, mediation and the Settlement;

- d. preparing initial complaint;
- e. Conducting extensive research related to Plaintiffs' claims, including thoroughly reviewing scientific literature regarding whether GMOs can be considered 'natural';
- f. Researching federal policy concerning labeling of food products containing the allegedly synthetic ingredients and marketed as 'all natural';
- g. Significant coordination with co-counsel regarding case strategy;
- h. Drafting and revising the original complaint and all subsequent pleadings;
- i. Editing and reviewing Responses in Opposition to Defendant's Motions to Dismiss the original and amended pleadings and drafting oppositions to Defendant's accompanying Requests for Judicial Notice;
- j. Assist with mediation preparation during various stages in the litigation process;
- k. Assisting Plaintiff with her Responses to Defendant's Requests for Production and Interrogatories;
- l. Preparing for, traveling to and defending the Class Representatives' depositions;
- m. Drafting sections of Plaintiffs' Motion for Class Certification;
- n. Drafting sections of Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement;
- o. Drafting sections of the Opposition to Defendant's motion for Summary

Judgment;

p. Participating in settlement discussions;

59. Costs incurred by LOHWR in this matter are \$6,881.12, all of which were reasonable. The categories of expenses for which Class Counsel, as detailed below, seek reimbursement are the type of expenses routinely charged to paying clients in the marketplace and, therefore, the full requested amount should be reimbursed. The expenses include but are not limited to: filing fees, mediation fees, travel expenses for Plaintiffs' depositions (airfare to Fort Lauderdale from San Francisco, lodging and rental car).

60. Below is a detailed breakdown of LOHWR's costs incurred in the Litigation:

<i>EXPENSE CATEGORY</i>	<i>COST</i>
Clerk Fees, Filing Fees, Attorney Service and Court Reporters	\$ 350.00
Overnight Mail/ Postage	\$
Telephone/ Conference Call	\$
Internal Photocopies	\$
Printing and Reproduction	\$
Lodging and Transportation	\$ 4,077.12
Mediator Fees	\$ 2,454.16
Expert Witness Fees	\$
Litigation Class Notice	\$
<i>TOTAL</i>	\$ 6,881.12

61. Class Counsel maintained contemporaneous and detailed time records and documentation evidencing each of the claimed expenses. At the Court's request, Class Counsel can provide the Court with these documents and information for *in camera* review.

62. Class Counsel has not been reimbursed for any costs incurred in the Litigation

and will not be reimbursed absent the Court's award.

63. Plaintiffs' future costs (*e.g.*, travel to the Settlement Hearing) are not included in the requested cost award, and Plaintiffs do not seek reimbursement for those costs.

64. Given the contentious history of the Litigation and the results achieved, the number of hours is reasonable, particularly because Class Counsel will only be compensated for a portion of that time.

65. Class Counsel took appropriate steps to avoid duplication of effort and to efficiently manage, staff, assign and divide the work between the four law firms and amongst lower and higher-level attorneys.

66. If the lodestar approach were applied, this case would justify a multiplier. Considering a significant multiplier would certainly be justified in this case, Class Counsel's fee request would satisfy a cross-check using the lodestar method.

67. Class Counsel's work is not yet done. Class Counsel still need to, among other things: (1) continue to monitor the notice program, communicate with the Claims Administrator, Digital Settlement Group (DSG) and respond to class member inquiries; (2) respond to objections, if any; (3) prepare for and attend the Settlement Hearing; (4) continue to oversee the claims administration process, including addressing any claim review issues; (5) monitor distribution of benefits to the Settlement Class; (6) potentially handle post-judgment appeals; and (7) review and monitor Defendant's submissions of bi-annual compliance reports for three years following the Effective Date, as required by section IV(C) of the Agreement.

68. The time Class Counsel spent on the Litigation was time that could not be spent on litigating other matters. Class Counsel have worked on this case since early 2012, when they were

contacted by Plaintiffs and investigated their claims. In effect, Class Counsel has loaned their legal services to the Settlement Class since that time. Class Counsel have prosecuted this case wholly on a contingency basis, and did so at great risk of never receiving any compensation, due to the risky nature of class action litigation and the developing law with respect to Rule 23 requirements and the implied ascertainability requirement, “All Natural” food-labeling claims, and calculating class-wide damages. In addition to the contingent risk of the case, Class Counsel’s representation of Plaintiffs and the Class in this heavily litigated case forced Class Counsel to forego other cases.

69. False advertising claims regarding ‘natural’ labeling on food products has been developing in federal and state courts across the Country, including this District, and are still being met with vigorous opposition. Indeed, at the time Plaintiffs filed suit, there was a growing trend by courts to reject claims similar to those of Plaintiffs here.

70. While Class Counsel are confident in the strength of Plaintiffs’ case, they are also pragmatic in their awareness of the fact that in order to succeed at trial, Plaintiffs would be required to succeed on their pending Motion for Class Certification and overcome Kashi’s defenses on the merits, whether on Kashi’s pending summary judgment motion or at trial. Kashi vigorously opposed Plaintiffs’ Motion for Class Certification, which was filed weeks after an order from the Honorable Beth J. Bloom denying class certification in a similar consumer class action regarding ‘all natural’ claims. Specifically, Judge Bloom found the class was not ascertainable¹ because the variation in the challenged products and labels created a “subjective

¹ At the time the Parties settled, the issue of whether class members can self-identify where retailers have no records identifying class members was on appeal before the Eleventh Circuit and has since been decided. *Karhu v. Vital Pharmaceuticals*, No. 14-11648, 2015 WL 3560722 (11th Cir. 2015) (affirming order denying class certification) (unpublished). This decision, albeit unpublished, would have presented serious obstacles to class certification, as most class members

memory problem,” as consumers would have to “remember whether they purchased the challenged products.” See *Randolph v. J.M. Smucker Co.*, No. 13-CIV-80581, 303 F.R.D. 679, 685-692 (Dec. 23, 2014). Defendant’s counsel in this Litigation also represented J.M. Smucker in *Randolph*.

71. Defendant put forward evidence, including internal documents, consumer surveys and expert testimony in support of Kashi’s contention that consumers have varying definitions of the term ‘natural’ and that ‘All Natural’ claims are not material to reasonable consumers. [ECF 142 at pp. 11-14]. Although Class Counsel are confident we could have overcome Kashi’s challenges with its own expert’s consumer survey and testimony regarding commonality and typicality, Class Counsel recognize the risks associated with proving materiality, reliance and class-wide damages. If they were to prevail on their Motion for Class Certification, with Kashi’s summary judgment motion under submission, Plaintiffs also faced an imminent risk of judgment being entered against the entire class. Even if Plaintiffs prevailed on all of these issues at the district court level, Defendant would have raised them again before the Eleventh Circuit following entry of judgment, thereby creating new risks and years of delay. Each of these risks, standing alone, could have impeded Plaintiffs’ successful prosecution of these claims at trial (and in any appeal). Together, they overwhelmingly demonstrate that Plaintiffs’ claims against Kashi were far from a “slam dunk” and that, in light of all the circumstances, the Settlement achieves an excellent class-wide result.

do not have receipts.

72. The Settlement is outstanding. Instead of facing additional years of costly and uncertain litigation, Settlement Class Members will receive an immediate cash benefit as well as valuable future non-monetary relief.

73. Further evidence of the excellent result Class Counsel achieved is the fact that the Settlement has been met with near-universal approval at this stage. The Notice informed the Class about the Settlement terms, including that Plaintiffs would seek (1) up to \$180,000 in costs and \$1,500,000 in attorneys' fees and (2) Service Awards of \$5,000 for each of the two Class Representatives. Moreover, based on the information provided to us by the Claims Administrator, 96,214 Class Members have submitted claims, and there have been zero objections and zero opt-outs to the Settlement.

74. Class Counsel are seasoned attorneys with considerable experience litigating and settling consumer protection class actions of similar size, scope and complexity. As set forth above, Class Counsel regularly engage in major complex litigation involving deceptively labeled consumer products and have been appointed class counsel by courts throughout the country. Class Counsel's skill at adapting our litigation strategies to address the challenges posed by adverse case law on Rule 23 and 'all natural' food-labeling claims, as well as the formidable defense mounted by Kashi's counsel, was critical in opposing multiple Rule 12(b)(6) motions to dismiss, fully briefing class certification and opposing Defendant's Motion for Summary Judgment.

75. As set forth above, Class Counsel thoroughly investigated Plaintiffs' claims and made skillful use of documents and information to assess Defendant's potential exposure as to the claims at issue. With this information, Class Counsel developed theories of certification and

liability after carefully studying, along with Plaintiff's agricultural technology and consumer marketing experts, and Defendant's internal marketing materials and documents regarding the Challenged Ingredients. Class Counsel also enlisted the assistance of Dr. Sharp to assist in developing Plaintiff's damages and restitution theories, utilizing Defendant's internal marketing materials, financial data and shipping records, in addition to third party data. Class Counsel marshalled this discovery in briefing on class certification and summary judgment.

76. The skill and competence of Defendant's lawyers should be considered and cannot be doubted. Defendant is represented by Jenner Block, full-service global law firm with 480 lawyers, and Buchanan Ingersoll & Rooney, PC, with 510 lawyers, both of whom have the resources and reputations for vigorous and effective advocacy of their clients' interests. *See* www.jenner.com and www.bipc.com. For that reason, Class Counsel had to stay on the very top of every single one of the many, sprawling issues at play during the life of the litigation.

77. DSG has undertaken a number of activities necessary for the Settlement Class, including effectuating Notice and collecting and administering claims. These steps were all done with approval and oversight of Class Counsel and counsel for Defendant to ensure Notice was reasonable and the best practicable, but also to keep expenses as low as possible.

78. Class Notice and Claims Administration is estimated to cost \$300,000. This figure will be refined and updated as additional claims are received and further steps are taken towards final approval and distribution.

79. Accordingly, it is proper to pay the costs of Notice and Claims Administration from the Settlement payment by Kashi, and these costs are reasonable and should be approved.

80. The Service Awards in the amount of \$5,000 for each of the two Class Representatives should also be approved. Service Awards in these amounts are reasonable, because the Class Representatives dedicated their time and effort to pursuing their claims on behalf of putative class members and demonstrated a willingness to participate in the Litigation. Plaintiffs also undertook the responsibilities and attendant risks of bringing a representative action, including aiding in investigating their claims, responding to discovery, sitting for contentious, half-day depositions, communicating with Plaintiffs' counsel on a regular basis. Plaintiffs' work in this Litigation resulted in a significant benefit to Class members.

We declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on this 14th day of December, 2015.

Los Angeles, California

/s/ Gillian L. Wade

Gillian L. Wade
Milstein Adelman, LLP

Miami, Florida

/s/ Angela V. Arango-Chaffin

Angela V. Arango-Chaffin
Chaffin Law Firm

Beaumont, Texas

/s/ L. DeWayne Layfield

L. DeWayne Layfield
Law Office of L. DeWayne Layfield, PLLC

Granite Bay, California

/s/ Michael T. Fraser

Michael T. Fraser
Law Offices of Howard W. Rubinstein, P.A.

EXHIBIT A

L. DeWayne Layfield was born in Beaumont, Texas on November 18, 1963. Mr. Layfield graduated *summa cum laude* with a B.S. in Chemical Engineering from Lamar University in 1987. He graduated from The University of Texas School of Law with Honors and was admitted to the Texas Bar in 1990. Thereafter, he clerked for the Honorable Thomas Gibbs Gee, Circuit Judge United States Court of Appeals for the Fifth Circuit. At the conclusion of the clerkship, he joined Vinson & Elkins LLP in their Houston, Texas office. In 1995, Mr. Layfield joined Bridgestone/Firestone, Inc. as senior litigation counsel. In 1997, Mr. Layfield returned to private practice. Mr. Layfield's practice has involved class and non-class mass tort litigation, the nationwide coordination of tort litigation as well as commercial, contract, and environmental litigation. Mr. Layfield has assisted with the prosecution or defense of thousands of individual claims and class litigation involving tens of thousands of individuals. Mr. Layfield has been appointed class counsel in the following matters:

- (1) Cause No. 1:99cv0120; *Ethan Shaw, et al. v. Toshiba America Information Systems, et al.*; In the United States District Court for the Eastern District of Texas;
- (2) Cause No. A-162,152; *Hal LaPray, et al. v. Compaq Computer Corporation*; In the 60th Judicial District Court, Jefferson County, Texas;
- (3) Cause No. A-164,880; *Muzette Alvis, et al. v. Hewlett-Packard Company*; In the 58th Judicial District Court, Jefferson County, Texas;
- (4) Cause No. D-164,939; *Michael Albanese, et al. v. Compaq Computer Corporation*; In the 136th Judicial District Court, Jefferson County, Texas;
- (5) Cause No. E-165,336; *David Packard, et al. v. eMachines, Inc., et al.*; In the 172nd Judicial District Court, Jefferson County, Texas;
- (6) Cause No. E-167,872; *Sandra Geter, et al. v. Farmers Group, Inc., et al.*; In the 172nd Judicial District Court, Jefferson County, Texas; and
- (7) Cause No. 8725; *Anderson Brothers Partnership, et al. v. EnerMart Energy Services Trust, et al.*; In the 287th Judicial District Court, Parmer County, Texas
- (8) Cause No. CJ-2003-967; *Debbie Barrett, Individually and on Behalf of Those Similarly Situated v. Hewlett Packard Company*; In the District Court for Cleveland County, Oklahoma;
- (9) Cause No. CJ-2003-969; *Stephen Grider, Beverly Grider v. Compaq Computer Corporation*; In the District Court for Cleveland County, Oklahoma
- (10) Cause No. 9:14-cv-80005-BB; *Deena Klacko, et al. v. Diamond Foods, Inc., a California Corporation*; In the United States District Court in the Southern District of Florida

Mr. Layfield is also a member of the Plaintiffs' Steering Committee in MDL-1840 *In Re Fuel Temperature Sales Practice*.

These class actions and other individual actions prosecuted by Mr. Layfield have resulted in cash payments to or for the benefit of his clients of over \$750 million. Considering cash equivalent payments and other benefits the recovery for these clients is over \$2 billion. Mr. Layfield has also been counsel for defendants in class actions.

Mr. Layfield is admitted to practice before the courts of Texas as well as the Federal Courts for the Eastern and Southern Districts of Texas and the United States Court of Appeals for the Fifth Circuit. He is a member of the American Bar Association, American Association for Justice, Defense Research Institute; a Life Fellow of the Texas Bar Foundation; has been named a Super

Lawyer and included in the Best Lawyers in America and is a past Member of the State Bar or Texas Committee on Jury Service.

While at The University of Texas School of Law, Mr. Layfield served as Editor in Chief of the *Texas Law Review* and was a member of Chancellors and the Order of the Coif. Mr. Layfield has also been elected to Tau Beta Pi and Omega Chi Epsilon as well as other honorary societies.

EXHIBIT B



2013 NLJ Billing Survey

Source: National Law Journal

Category: National Law Journal

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

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

2013	Baker & Hostetler	Cleveland, OH	810	\$685.00	\$250.00	\$450.00	\$455.00	\$120.00	\$260.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Baker & McKenzie	Chicago, IL	4004	\$1130.00	\$260.00	\$755.00	\$925.00	\$100.00	\$395.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Baker, Donelson, Bearman, Caldwell & Berkowitz	Memphis, Tenn.	587	\$495.00	\$340.00	\$400.00	\$465.00	\$245.00	\$295.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Ballard Spahr	Philadelphia, PA	479	\$650.00	\$395.00	\$475.00	\$495.00	\$235.00	\$315.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Barnes & Thornburg	Indianapolis, IN	487	\$580.00	\$330.00	\$480.00	\$370.00	\$260.00	\$320.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Benesch, Friedlander, Coplan & Aronoff	Cleveland, OH	150	\$635.00	\$360.00	\$455.00	\$475.00	\$155.00	\$280.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Best Best & Krieger	Riverside, CA	175	\$655.00	\$340.00	\$455.00	\$385.00	\$235.00	\$280.00	\$435.00	\$325.00	\$565.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Bingham McCutchen	Boston, MA	900	\$1080.00	\$220.00	\$795.00	\$605.00	\$185.00	\$450.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Blank Rome	Philadelphia, PA	471	\$940.00	\$445.00	\$640.00	\$565.00	\$175.00	\$350.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Bond, Schoeneck & King	Syracuse, NY	194	\$520.00	\$240.00	\$355.00	\$285.00	\$160.00	\$225.00	\$385.00	\$295.00	\$485.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Bowles Rice	Charleston, WV	128	\$285.00	\$165.00	\$230.00	\$180.00	\$115.00	\$135.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Bracewell & Giuliani	Houston, TX	432	\$1125.00	\$575.00	\$760.00	\$700.00	\$275.00	\$440.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.

2013	Bradley Arant Boult Cummings	Birmingham, AL	396	\$605.00	\$325.00	\$430.00	\$340.00	\$200.00	\$260.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Broad and Cassel	Orlando, FL	160	\$465.00	\$295.00	\$380.00							National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Brownstein Hyatt Farber Schreck	Denver, CO	216	\$700.00	\$310.00	\$520.00	\$345.00	\$265.00	\$305.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Bryan Cave	St. Louis, MO	990	\$860.00	\$405.00	\$590.00	\$570.00	\$210.00	\$405.00	\$600.00	\$320.00	\$810.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Buchalter Nemer	Los Angeles, CA	134	\$695.00	\$475.00	\$605.00	\$375.00	\$350.00	\$365.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Burr & Forman	Birmingham, AL	249	\$525.00	\$240.00	\$355.00	\$350.00	\$200.00	\$245.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Butzel Long	Bloomfield Hills, MI	125	\$535.00	\$350.00	\$440.00	\$415.00	\$215.00	\$305.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Cadwalader, Wickersham & Taft	New York, NY	435	\$1050.00	\$800.00	\$930.00	\$750.00	\$395.00	\$605.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Carlton Fields	Tampa, FL	276	\$840.00	\$455.00	\$600.00							National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Connell Foley	Roseland, NJ	121	\$575.00	\$275.00	\$425.00	\$325.00	\$200.00	\$265.00	\$450.00	\$275.00	\$625.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Cooley	Palo Alto, CA	632	\$990.00	\$660.00	\$820.00	\$630.00	\$160.00	\$525.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Covington & Burling	Washington, DC	738	\$890.00	\$605.00	\$780.00	\$565.00	\$320.00	\$415.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.

2013	Cox Smith Matthews	San Antonio, TX	117	\$595.00	\$395.00	\$505.00	\$485.00	\$230.00	\$320.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Cozen O'Connor	Philadelphia, PA	509	\$1050.00	\$300.00	\$555.00	\$590.00	\$235.00	\$345.00	\$560.00	\$360.00	\$790.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Curtis, Mallet-Prevost, Colt & Mosle	New York, NY	322	\$860.00	\$730.00	\$800.00	\$785.00	\$345.00	\$480.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Davis Graham & Stubbs	Denver, CO	146	\$595.00	\$350.00	\$435.00	\$340.00	\$150.00	\$245.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Davis Polk & Wardwell	New York, NY	787	\$985.00	\$850.00	\$975.00	\$975.00	\$130.00	\$615.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Debevoise & Plimpton	New York, NY	615	\$1075.00	\$955.00	\$1055.00	\$760.00	\$120.00	\$490.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Dechert	New York, NY	803	\$1095.00	\$670.00	\$900.00	\$735.00	\$395.00	\$530.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Dentons			\$1050.00	\$345.00	\$700.00	\$685.00	\$210.00	\$425.00				National Law Journal, December 2013	Location and Average FTE Attorneys' data not available due to merger in 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Dickstein Shapiro	Washington, DC	308	\$1250.00	\$590.00	\$750.00	\$585.00	\$310.00	\$475.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Dinsmore & Shohl	Cincinnati, OH	422	\$850.00	\$250.00	\$400.00	\$350.00	\$140.00	\$235.00	\$345.00	\$140.00	\$615.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	DLA Piper	New York, NY	4036	\$1025.00	\$450.00	\$765.00	\$750.00	\$250.00	\$510.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Dorsey & Whitney	Minneapolis, MN	517	\$585.00	\$340.00	\$435.00	\$510.00	\$215.00	\$315.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.

2013	Duane Morris	Philadelphia, PA	613	\$710.00	\$430.00	\$620.00	\$490.00	\$295.00	\$370.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Edwards Wildman Palmer	Boston, MA	572	\$765.00	\$210.00	\$535.00	\$415.00	\$245.00	\$325.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Faegre Baker Daniels	Minneapolis, MN	683	\$580.00	\$355.00	\$455.00	\$315.00	\$110.00	\$260.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Foley & Lardner	Milwaukee, WI	872	\$860.00	\$405.00	\$600.00	\$470.00	\$210.00	\$335.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Foley Hoag	Boston, MA	223	\$775.00	\$590.00	\$670.00	\$385.00	\$290.00	\$325.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Fox Rothschild	Philadelphia, PA	490	\$750.00	\$335.00	\$530.00	\$500.00	\$245.00	\$310.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Fried, Frank, Harris, Shriver & Jacobson	New York, NY	476	\$1100.00	\$930.00	\$1000.00	\$760.00	\$375.00	\$595.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Gardere Wynne Sewell	Dallas, TX	223	\$775.00	\$430.00	\$635.00	\$445.00	\$235.00	\$310.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Gibbons	Newark, NJ	210	\$865.00	\$440.00	\$560.00	\$475.00	\$295.00	\$360.00	\$490.00	\$385.00	\$750.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Gibson, Dunn & Crutcher	New York, NY	1086	\$1800.00	\$765.00	\$980.00	\$930.00	\$175.00	\$590.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Gordon & Rees	San Francisco, CA	457	\$475.00	\$375.00	\$420.00	\$325.00	\$285.00	\$300.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Greenberg Traurig	New York, NY	1699	\$955.00	\$360.00	\$655.00	\$595.00	\$200.00	\$390.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.

2013	Harris Beach	Rochester, NY	204	\$600.00	\$295.00	\$385.00	\$285.00	\$175.00	\$260.00	\$385.00	\$175.00	\$600.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Harter Secrest & Emery	Rochester, NY	136	\$465.00	\$300.00	\$385.00	\$290.00	\$195.00	\$250.00	\$325.00	\$260.00	\$380.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Haynes and Boone	Dallas, TX	489	\$1020.00	\$450.00	\$670.00	\$580.00	\$310.00	\$405.00	\$510.00	\$220.00	\$840.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Hogan Lovells	Washington, DC	2280	\$1000.00	\$705.00	\$835.00							National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Holland & Hart	Denver, CO	409	\$725.00	\$295.00	\$435.00	\$415.00	\$165.00	\$275.00	\$360.00	\$185.00	\$595.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Holland & Knight	Washington, DC	926	\$1035.00	\$335.00	\$595.00	\$575.00	\$210.00	\$325.00	\$580.00	\$480.00	\$775.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Honigman Miller Schwartz and Cohn	Detroit, MI	227	\$560.00	\$290.00	\$390.00	\$225.00	\$205.00	\$220.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Hughes Hubbard & Reed	New York, NY	344	\$995.00	\$725.00	\$890.00	\$675.00	\$365.00	\$555.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Husch Blackwell	St. Louis, MO	514	\$925.00	\$235.00	\$430.00	\$465.00	\$190.00	\$260.00	\$395.00	\$230.00	\$600.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Ice Miller	Indianapolis, IN	301	\$530.00	\$335.00	\$450.00	\$305.00	\$245.00	\$270.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Irell & Manella	Los Angeles, CA	164	\$975.00	\$800.00	\$890.00	\$750.00	\$395.00	\$535.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Jackson Kelly	Charleston, WV	200	\$370.00	\$175.00	\$280.00	\$265.00	\$145.00	\$195.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.

2013	Jackson Lewis	Los Angeles, CA	690	\$440.00	\$310.00	\$380.00	\$315.00	\$275.00	\$290.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Jackson Walker	Dallas, TX	328	\$550.00	\$450.00	\$500.00	\$385.00	\$255.00	\$335.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Jeffer, Mangels, Butler & Mitchell	Los Angeles, CA	126	\$875.00	\$560.00	\$690.00							National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Jenner & Block	Chicago, IL	432	\$925.00	\$565.00	\$745.00	\$550.00	\$380.00	\$465.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Jones Day	New York, NY	2363	\$975.00	\$445.00	\$745.00	\$775.00	\$205.00	\$435.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Jones Walker	New Orleans, LA	361	\$425.00	\$275.00	\$385.00	\$240.00	\$200.00	\$225.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Kasowitz, Benson, Torres & Friedman	New York, NY	365	\$1195.00	\$600.00	\$835.00	\$625.00	\$200.00	\$340.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Katten Muchin Rosenman	Chicago, IL	586	\$745.00	\$500.00	\$615.00	\$595.00	\$340.00	\$455.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Kaye Scholer	New York, NY	414	\$1080.00	\$715.00	\$860.00	\$680.00	\$320.00	\$510.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Kelley Drye & Warren	New York, NY	298	\$815.00	\$435.00	\$640.00	\$600.00	\$305.00	\$430.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Kilpatrick Townsend & Stockton	Atlanta, GA	552	\$775.00	\$400.00	\$550.00	\$475.00	\$315.00	\$385.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	King & Spalding	Atlanta, GA	838	\$995.00	\$545.00	\$775.00	\$735.00	\$125.00	\$460.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.

2013	Kirkland & Ellis	Chicago, IL	1517	\$995.00	\$590.00	\$825.00	\$715.00	\$235.00	\$540.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Knobbe, Martens, Olson & Bear	Irvine, CA	268	\$785.00	\$440.00	\$555.00	\$535.00	\$295.00	\$345.00	\$685.00	\$685.00	\$685.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Kramer Levin Naftalis & Frankel	New York, NY	320	\$1025.00	\$740.00	\$845.00	\$750.00	\$400.00	\$590.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Lane Powell	Seattle, WA	172	\$465.00	\$365.00	\$430.00	\$330.00	\$225.00	\$265.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Latham & Watkins	New York, NY	2033	\$1110.00	\$895.00	\$990.00	\$725.00	\$465.00	\$605.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Lathrop & Gage	Kansas City, MO	286	\$700.00	\$285.00	\$420.00	\$375.00	\$195.00	\$250.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Leonard, Street and Deinard	Minneapolis, MN	184	\$490.00	\$295.00	\$405.00	\$305.00	\$265.00	\$285.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Lewis Roca Rothgerber			\$695.00	\$380.00	\$505.00	\$525.00	\$205.00	\$400.00				National Law Journal, December 2013	Location and Average FTE Attorneys' data not available due to merger in 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Lindquist & Vennum	Minneapolis, MN	181	\$600.00	\$460.00	\$520.00	\$470.00	\$275.00	\$365.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Littler Mendelson	San Francisco, CA	909	\$615.00	\$395.00	\$550.00	\$420.00	\$245.00	\$290.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Lowenstein Sandler	Roseland, NJ	254	\$755.00	\$510.00	\$615.00	\$650.00	\$260.00	\$360.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Manatt, Phelps & Phillips	Los Angeles, CA	325	\$795.00	\$640.00	\$740.00							National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.

2013	McCarter & English	Newark, NJ	373	\$625.00	\$450.00	\$530.00	\$370.00	\$220.00	\$300.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	McDermott Will & Emery	Chicago, IL	1024	\$835.00	\$525.00	\$710.00							National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	McElroy, Deutsch, Mulvaney & Carpenter	Morristown, NJ	288	\$505.00	\$325.00	\$440.00	\$325.00	\$200.00	\$295.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	McGuireWoods	Richmond, VA	941	\$725.00	\$450.00	\$595.00	\$525.00	\$285.00	\$360.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	McKenna Long & Aldridge	Atlanta, GA	509	\$650.00	\$480.00	\$530.00	\$425.00	\$375.00	\$395.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Michael Best & Friedrich	Milwaukee, WI	198	\$650.00	\$260.00	\$445.00	\$350.00	\$190.00	\$275.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Miles & Stockbridge	Baltimore, MD	207	\$725.00	\$330.00	\$470.00	\$375.00	\$230.00	\$285.00	\$425.00	\$215.00	\$675.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Miller & Martin	Chattanooga, TN	133	\$585.00	\$245.00	\$385.00	\$270.00	\$180.00	\$215.00	\$355.00	\$210.00	\$440.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Morgan, Lewis & Bockius	Philadelphia, PA	1334	\$765.00	\$430.00	\$620.00	\$585.00	\$270.00	\$390.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Morris, Manning & Martin	Atlanta, GA	142	\$575.00	\$400.00	\$480.00							National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Morrison & Foerster	San Francisco, CA	1010	\$1195.00	\$595.00	\$865.00	\$725.00	\$230.00	\$525.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Nixon Peabody	Boston, MA	612	\$850.00	\$295.00	\$520.00	\$550.00	\$180.00	\$300.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.

2013	Norton Rose Fulbright			\$900.00	\$525.00	\$775.00	\$515.00	\$300.00	\$400.00				National Law Journal, December 2013	Location and Average FTE Attorneys' data not available due to merger in 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Nutter McClennen & Fish	Boston, MA	135	\$715.00	\$470.00	\$575.00	\$460.00	\$295.00	\$375.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	O'Melveny & Myers	Los Angeles, CA	738	\$950.00	\$615.00	\$715.00							National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Orrick, Herrington & Sutcliffe	San Francisco, CA	977	\$945.00	\$305.00	\$625.00	\$675.00	\$170.00	\$310.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Parker Poe Adams & Bernstein	Charlotte, NC	178	\$500.00	\$425.00	\$450.00							National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Patton Boggs	Washington, DC	485	\$780.00	\$490.00	\$665.00	\$475.00	\$325.00	\$405.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Paul Hastings	New York, NY	899	\$900.00	\$750.00	\$815.00	\$755.00	\$335.00	\$540.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Paul, Weiss, Rifkind, Wharton & Garrison	New York, NY	803	\$1120.00	\$760.00	\$1040.00	\$760.00	\$250.00	\$600.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Pepper Hamilton	Philadelphia, PA	493	\$850.00	\$475.00	\$630.00	\$460.00	\$245.00	\$360.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Perkins Coie	Seattle, WA	823	\$940.00	\$320.00	\$600.00	\$595.00	\$215.00	\$405.00	\$565.00	\$270.00	\$790.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Pillsbury Winthrop Shaw Pittman	Washington, DC	609	\$1070.00	\$615.00	\$865.00	\$860.00	\$375.00	\$520.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Polsinelli	Kansas City, MO	573	\$750.00	\$320.00	\$410.00	\$340.00	\$220.00	\$265.00	\$370.00	\$300.00	\$425.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.

2013	Proskauer Rose	New York, NY	746	\$950.00	\$725.00	\$880.00	\$675.00	\$295.00	\$465.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Quarles & Brady	Milwaukee, WI	413	\$600.00	\$350.00	\$470.00	\$600.00	\$210.00	\$335.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Quinn Emanuel Urquhart & Sullivan	New York, NY	697	\$1075.00	\$810.00	\$915.00	\$675.00	\$320.00	\$410.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Reed Smith	Pittsburgh, PA	1468	\$945.00	\$545.00	\$710.00	\$530.00	\$295.00	\$420.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Richards, Layton & Finger	Wilmington, DE	138	\$850.00	\$475.00	\$660.00	\$450.00	\$250.00	\$350.00	\$465.00	\$450.00	\$475.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Riker Danzig Scherer Hyland & Perretti	Morristown, NJ	151	\$495.00	\$430.00	\$455.00	\$295.00	\$210.00	\$250.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Robinson & Cole	Hartford, CT	209	\$490.00	\$285.00	\$410.00							National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Rutan & Tucker	Costa Mesa, CA	139	\$675.00	\$345.00	\$490.00	\$500.00	\$230.00	\$320.00	\$490.00	\$435.00	\$575.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Saul Ewing	Philadelphia, PA	226	\$850.00	\$365.00	\$530.00	\$575.00	\$225.00	\$340.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Sedgwick	San Francisco, CA	347	\$615.00	\$305.00	\$425.00	\$475.00	\$250.00	\$325.00	\$450.00	\$350.00	\$660.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Seward & Kissel	New York, NY	152	\$850.00	\$625.00	\$735.00	\$600.00	\$290.00	\$400.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Seyfarth Shaw	Chicago, IL	753	\$860.00	\$375.00	\$610.00	\$505.00	\$225.00	\$365.00	\$470.00	\$245.00	\$800.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.

2013	Sheppard, Mullin, Richter & Hampton	Los Angeles, CA	521	\$875.00	\$490.00	\$685.00	\$535.00	\$275.00	\$415.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Shumaker, Loop & Kendrick	Toledo, OH	226	\$585.00	\$295.00	\$405.00	\$335.00	\$175.00	\$260.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Shutts & Bowen	Miami, FL	221	\$660.00	\$250.00	\$430.00	\$345.00	\$195.00	\$260.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Skadden, Arps, Slate, Meagher & Flom	New York, NY	1735	\$1150.00	\$845.00	\$1035.00	\$845.00	\$340.00	\$620.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Snell & Wilmer	Phoenix, AZ	422	\$695.00	\$295.00	\$495.00	\$420.00	\$185.00	\$280.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Squire Sanders	Cleveland, OH	1257	\$950.00	\$350.00	\$655.00	\$530.00	\$250.00	\$355.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Stevens & Lee	Reading, PA	167	\$800.00	\$525.00	\$625.00							National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Stinson Morrison Hecker	Kansas City, MO	280	\$695.00	\$290.00	\$475.00	\$650.00	\$185.00	\$280.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Stoel Rives	Portland, OR	371	\$690.00	\$320.00	\$475.00	\$425.00	\$190.00	\$280.00	\$410.00	\$320.00	\$550.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Strasburger & Price	Dallas, TX	208	\$770.00	\$225.00	\$420.00	\$450.00	\$215.00	\$260.00	\$445.00	\$225.00	\$600.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Taft, Stettinius & Hollister	Cincinnati, OH	303	\$535.00	\$285.00	\$415.00	\$475.00	\$200.00	\$285.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013	Thompson & Knight	Dallas, TX	281	\$740.00	\$425.00	\$535.00	\$610.00	\$240.00	\$370.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.

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

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