IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

RASHEED WALTERS, et al.,	)	
Plaintiffs,	)	
v.	)	Civil Action No. 1:22-cv-12048-PBS
THE CITY OF BOSTON, et al.,	)	
Defendants.	)	

DEFENDANT'S OPPOSITION TO PLAINTIFFS' MOTION FOR ATTORNEYS' FEES, COSTS, AND EXPENSES

I. INTRODUCTION

The Defendants (hereinafter the "City") hereby oppose the Plaintiffs' Petition for Fees and Costs (hereinafter the "Petition") and move this Court to substantially reduce the amount of attorneys' fees requested by the Plaintiffs. Plaintiffs' request for $442,890.00 of fees is patently unreasonable because (1) their proposed hourly rates are inconsistent with rates of attorneys with a similar level of experience in civil rights matters; (2) the copious "block billing" by combining several tasks into a single entry makes it impossible for the City to discern the duration of each task or challenge the legitimacy of the task performed; (3) the insufficient level of description in the bills make it impossible for the City or the Court to determine the validity of the work performed; (4) there is no distinction made between "core" and "non-core" work; and (5) Plaintiffs include tasks wholly unrelated to advancing the litigation. As a result of these deficiencies, the City requests that the submitted attorneys' fees awarded Plaintiffs be substantially reduced to $111,149.00.

Table1

Entry #	Date	Person	Description	Elapsed Time	Rate	Total	City's Objection	City's Additional Objections
170	2/19/2023-2/20/2023	Hannington	Draft Opposition to Defendants' Motion for Clarification	3.5	$ 700.00	$ 2,450.00	Block Billing	
171	2/20/2023	Gannon	Review draft Memorandum from Glen Hannington, Esq.	0.4	$ 700.00	$ 280.00		
172	2/20/2023	Hannington	Zoom with Attorneys Gannon and Dashiell	0.5	$ 700.00	$ 350.00	Insufficient Description	Non-Core Task
173	2/20/2023	Dashiell	Zoom conference call with Co-Counsel regarding interviewing prospective Plaintiffs from District 2 and draft email to scheduler of additional prospective Plaintiffs; calls and text to Co-Counsel and potential witness and plaintiffs.	0.7	$ 700.00	$ 490.00	Block Billing	Non-Core Tasks
174	2/20/2023	Dashiell	Conduct research on Rule 15(a) and applicable caselaw and discuss issues with Co-Counsel.	0.7	$ 700.00	$ 490.00	Block Billing	Mix of Core and Non-Core Tasks
175	2/20/2023	Dashiell	Draft Opposition to Defendant's Motion for Clarification of Scheduling Order Deadlines.	4	$ 700.00	$ 2,800.00	Duplicative	
176	2/20/2023	Dashiell	Participate in conference call with Co-Counsel Gannon and Interpreter/Scheduler, and new Plaintiffs Carmen Garcia-Rosario and Carmen Luisa Garcia Terrero; review with Co-Counsel.	0.25	$ 700.00	$ 175.00	Block Billing	Mix of Core and Non-Core Tasks
177	2/21/2023	Gannon	Receive notice from the Court regarding the filing of a motion. Review Motion for Leave to File Sur-Reply with proposed Affidavit. Calls to new Plaintiffs regarding intake and questions. Texts to and from Witness #1 regarding Plaintiffs. Call from a consultant regarding strategy.	1.2	$ 700.00	$ 840.00	Block Billing	Mix of Core and Non-Core Tasks
178	2/21/2023	Hannington	Discuss Opposition to Defendants' Motion for Clarification with Attorney Team and file the same	1	$ 700.00	$ 700.00	Block Billing	Mix of Core and Non-Core Tasks
179	2/21/2023	Hannington	Review of Motion for Leave to File Sur-Reply	0.5	$ 700.00	$ 350.00		
180	2/22/2023	Dashiell	Call Plaintiff Rita Dixon to provide case update and date of Preliminary Injunction Hearing.	0.45	$ 700.00	$ 315.00	Non-Core Work	
181	2/22/2023	Dashiell	Emails, texts, and calls with Co-Counsel to discuss strategies for Second Amended Complaint and Defendant's use of experts.	1.2	$ 700.00	$ 840.00	Non-Core Work	
182	2/22/2023-2/25/2023	Hannington	Emails, texts, and calls and with attorney team to discuss strategies for Second Amended Complaint	1.2	$ 700.00	$ 840.00	Non-Core Work	
183	2/22/2023-2/25/2023	Gannon	Emails and texts to and from Glen Hannington, Esq. and Frederick E. Dashiell, Esq. regarding the Boston City Councils' filings. Review Second Amended Complaint. Call Ellie Kasper. Attend zoom meeting with Glen Hannington, Esq. and Frederick E. Dashiell, Esq. regarding the Amended Complaint.	1.2	$ 700.00	$ 840.00	Block Billing	Mix of Core and Non-Core Work

Entry #	Date	Person	Description	Elapsed Time	Rate	Total	City's Objection	City's Additional Objections
184	2/23/2023	Hannington	Review of Defendants' Sur-Reply, Affidavit of Dr. Duchin	2.5	$ 700.00	$ 1,750.00		
185	2/23/2023	Dashiell	Receipt and review of Defendant's Sur-Reply Memorandum and Affidavit of Moon Duchin.	1	$ 700.00	$ 700.00		
186	2/24/2023-2/25/2023	Hannington	Drafting Second Amended Complaint adding additional Plaintiffs, Defendants and Exhibits	5.3	$ 700.00	$ 3,710.00	Unnecessary	
187	2/25/2023	Hannington	Zoom meeting with Attorneys Gannon and Dashiell to discuss amended complaint	1.6	$ 700.00	$ 1,120.00	Non-Core Task	
188	2/25/2023	Dashiell	Review draft of Second Amended Complaint and attend zoom meeting with Co-Counsel regarding sufficiency of pleading; review of race-balancing motives for redistricting changes.	1.5	$ 700.00	$ 1,050.00	Block Billing	Mix of Core and Non-Core Tasks
189	2/25/2023-2/26/2023	Gannon	Review Second Amended Complaint. Attend zoom meeting with Glen Hannington, Esq. and Frederick E. Dashiell, Esq. to discuss amendment. Call from a consultant. Texts and calls to Witness #1 regarding expert testimony to attorney's regarding precinct splitting and Amended Complaint experts.	3.1	$ 700.00	$ 2,170.00	Block Billing	Mix of Core and Non-Core Tasks
190	2/27/2023-3/01/2023-3/07/2023	Gannon	Email to court and texts to Witness #1, Glen Hannington, Esq. and Frederick E. Dashiell, Esq. regarding status of case, next steps, witnesses, etc. Review pleadings and Second Amendment with Exhibits.	1.8	$ 700.00	$ 1,260.00	Block Billing	Mix of Core and Non-Core Tasks
191	2/27/2023	Hannington	Edits to amended complaint and filing with the Court	1.5	$ 700.00	$ 1,050.00		
192	2/27/2023	Dashiell	Review of final edits to Second Amended Complaint; emails and text to Co-Counsel and others regarding strategies, status of case, next steps, witnesses; call from Plaintiff Rita Dixon and liaison David Eastmond.	3.4	$ 700.00	$ 2,380.00	Block Billing	Mix of Core and Non-Core Tasks
193	2/27/2023-03/1/2023	Hannington	Emails and texts to Attorneys Gannon and Dashiell and others regarding strategies going forward and the current status of the case	2	$ 700.00	$ 1,400.00	Block Billing	Non-Core Tasks
194	3/1/2023	Dashiell	Emails, texts to Co-Counsel reviewing Appeals Court caselaw on preliminary injunction, Second Amended Complaint and Witness List.	2	$ 700.00	$ 1,400.00	Block Billing	Mix of Core and Non-Core Tasks
195	3/4/2023	Hannington	Zoom with Attorneys Gannon and Dashiell	1.3	$ 700.00	$ 910.00	Insufficient Description	Non-Core Tasks
196	3/4/2023	Dashiell	Attend zoom conference call with Co-Counsel regarding preparation for 03/14/23 hearing, witness list due 03/08/23, and service of summonses on new Defendants' counsel.	1.5	$ 700.00	$ 1,050.00	Non-Core Task	
197	3/7/2023	Gannon	Attend zoom meeting with Glen Hannington, Esq. and Frederick E. Dashiell, Esq.	1	$ 700.00	$ 700.00	Insufficient Description	Non-Core Task

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198	3/7/2023	Hannington	Draft and file Plaintiffs' Witness List	1.5	$ 700.00	$ 1,050.00		
199	3/7/2023	Hannington	Zoom meeting with Attorneys Gannon and Dashiell	0.5	$ 700.00	$ 350.00	Insufficient Description	Non-Core Task
200	3/7/2023	Hannington	Review Court Order	0.2	$ 700.00	$ 140.00	Insufficient Description	
201	3/7/2023	Dashiell	Attend zoom conference call with Co-Counsel regarding assignment for drafting Witness List, scheduling Witness preparation meetings, and preparing Redistricting Maps for hearing.	0.4	$ 700.00	$ 280.00	Non-Core Task	
202	3/8/2023	Gannon	Attend zoom meeting with Glen Hannington, Esq. and Frederick E. Dashiell, Esq. regarding upcoming hearing.	3.5	$ 700.00	$ 2,450.00	Non-Core Task	
203	3/8/2023	Hannington	Zoom meeting with Attorneys Gannon and Dashiell	3.5	$ 700.00	$ 2,450.00	Insufficient Description	Non-Core Task
204	3/8/2023	Hannington	Review Court Order	0.2	$ 700.00	$ 140.00	Insufficient Description	
205	3/8/2023	Dashiell	Attend zoom conference call with Co-Counsel in preparation for Court Status Conference.	2.6	$ 700.00	$ 1,820.00	Non-Core Task	
206	3/8/2023	Dashiell	Attend video Court Status Conference on 03/14/23 start of Preliminary Injunction hearings; parties directed to file Amended Witness List; Plaintiffs directed to file motion for leave to Amend Complaint.	0.75	$ 700.00	$ 525.00		
207	3/8/2023	Dashiell	Attend in-person meeting with Co-Counsel and interview several witnesses; conference calls with other witnesses and Co-Counsel.	2	$ 700.00	$ 1,400.00	Block Billing	
208	3/10/2023	Gannon	Attend conference call with Lon Povich, Esq. and Jennifer. Review email from a consultant with attached Ugly Racist Quotes and Quotes from Councilors. Review tapes of council.	2.8	$ 700.00	$ 1,960.00	Block Billing	Mix of Core and Non-Core Work
209	3/10/2023	Hannington	Draft and file Rule 15(a)(2) motion and Amended Joint List of Witnesses	1.9	$ 700.00	$ 1,330.00		
210	3/10/2023	Dashiell	Attend conference call with Defendant's counsel on Joint Witness List; receipt and review of draft motion for leave to file Amended Complaint and Second Amended Complaint; draft direct examination time estimates.	1	$ 700.00	$ 700.00	Block Billing	
211	3/11/2023	Gannon	Emails to Attend zoom meeting with Glen Hannington, Esq. and Frederick E. Dashiell, Esq.	0.3	$ 700.00	$ 210.00	Non-Core Task	
212	3/11/2023	Hannington	Emails with Attorneys Gannon and Dashiell	0.3	$ 700.00	$ 210.00	Non-Core Task	
213	3/11/2023	Dashiell	Attend in-person Co-Counsel meeting with Plaintiffs Shirley Shillingford and Rita Dixon (by phone) and other potential witnesses.	2.3	$ 700.00	$ 1,610.00		
214	3/12/2023	Gannon	Confer with clients. Prepare for hearing. Review pleadings. Calls to and from Frederick E. Dashiell, Esq. regarding hearing.	5.2	$ 700.00	$ 3,640.00	Block Billing	Mix of Core and Non-Core Tasks

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215	3/12/2023	Dashiell	Attend in-person Co-Counsel meeting and conduct interviews with first witnesses scheduled for 03/14/23 Motion for Preliminary Injunction hearing; calls to Co-Counsel and review of pleadings.	5.2	$ 700.00	$ 3,640.00	Block Billing	Mix of Core and Non-Core Tasks
216	3/12/2023-3/15/2023	Gannon	Review email from a consultant. Emails to and from Frederick E. Dashiell, Esq. regarding the hearing. Review additional emails. Call to and from Frederick E. Dashiell, Esq. regarding meeting time. Attend Zoom meeting with Honorable Judge Patti B. Saris regarding rescheduling Motion for Preliminary Injunction to 03/28/23. Call Glen Hannington, Esq. regarding discussion.	4.2	$ 700.00	$ 2,940.00	Block Billing	
217	3/13/2023	Hannington	Review Court Order	0.2	$ 700.00	$ 140.00	Insufficient Description	
218	3/13/2023	Hannington	Zoom with Attorneys Gannon and Dashiell	2.1	$ 700.00	$ 1,470.00	Insufficient Description	Non-Core Task
219	3/13/2023	Dashiell	Special Status Conference with Court to review potential conflict of interest matter and to cancel 03/14/23 Preliminary Injunction hearing due to impending major storm and reschedule hearings.	0.35	$ 700.00	$ 245.00		
220	3/13/2023	Dashiell	Attend zoom conference call with Co-Counsel and witnesses to re-set witness attendance at rescheduled hearing dates starting 03/28/23;	2	$ 700.00	$ 1,400.00		
221	3/13/2023	Dashiell	Trip to FedEx Office to order Redistricting Maps or Courtroom exhibits.	1	$ 700.00	$ 700.00	Clerical Work	
222	3/14/2023	Hannington	Review Court Orders	0.3	$ 700.00	$ 210.00	Insufficient Description	
223	3/14/2023	Dashiell	Call from Co-Counsel Gannon to review documents and other witness preparation materials.	0.2	$ 700.00	$ 140.00	Insufficient Description	Non-Core Task
224	3/15/2023	Gannon	Emails to and from Glen Hannington, Esq. and Frederick E. Dashiell, Esq. Review email from a consultant with attached articles and other information for review.	0.3	$ 700.00	$ 210.00	Block Billing	Non-Core Tasks
225	3/15/2023	Hannington	Emails with Attorneys Gannon and Dashiell regarding information received from consultant	0.3	$ 700.00	$ 210.00	Insufficient Description	Non-Core Task
226	3/15/2023	Hannington	Review email from consultant	0.3	$ 700.00	$ 210.00	Insufficient Description	Non-Core Task
227	3/15/2023	Dashiell	Emails from and to Co-Counsel Hannington and Gannon to review emails from consultant with attached articles and other information for review.	0.65	$ 700.00	$ 455.00	Insufficient Description	Non-Core Task
228	3/16/2023	Gannon	Emails to and from Glen Hannington, Esq. and Frederick E. Dashiell, Esq. regarding scheduling, etc. Prepare preliminary timeline of events.	0.4	$ 700.00	$ 280.00	Block Billing	

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229	3/16/2023	Hannington	Emails with Attorneys Gannon and Dashiell regarding scheduling and timelines	0.4	$ 700.00	$ 280.00	Non-Core Task	
230	3/16/2023	Dashiell	Emails from and to Co-Counsel regarding scheduling witnesses and timelines of events.	0.4	$ 700.00	$ 280.00	Non-Core Task	
231	3/17/2023-3/18/2023	Gannon	Review timeline of events. Email copy to Glen Hannington, Esq. and Frederick E. Dashiell, Esq.	0.2	$ 700.00	$ 140.00	Block Billing	
232	3/18/2023	Hannington	Review timeline prepared by Attorney Gannon	0.2	$ 700.00	$ 140.00		
233	3/18/2023	Dashiell	Review timeline of events prepared by Co-Counsel Gannon.	0.2	$ 700.00	$ 140.00		
234	3/19/2023	Hannington	In-depth research of First Circuit Preliminary Injunction Standard	3.5	$ 700.00	$ 2,450.00	Unnecessary	
235	3/19/2023	Dashiell	Receipt and review of in-depth research on First Circuit Preliminary Injunction standard; continue witness preparation discussions and examination outlines.	3.5	$ 700.00	2,450.00	Block Billing	
236	3/20/2023	Gannon	Review 4 steps of injunctive relief and witness scripts for Councilor and Duchin. Calls to Glen Hannington, Esq. and a consultant regarding upcoming hearing evidence. Emails to and from Glen Hannington, Esq. and Frederick E. Dashiell, Esq. regarding same.	2.1	$ 700.00	1,470.00	Block Billing	
237	3/20/2023	Hannington	Calls with Attorneys Gannon and Dashiell to discuss First Circuit precedent and strategize arguments	1.5	$ 700.00	1,050.00	Non-Core Task	
238	3/20/2023	Dashiell	Calls with Co-Counsel to discuss Circuit precedent and strategic arguments in case.	1.5	$ 700.00	$ 1,050.00	Non-Core Task	
239	3/21/2023	Gannon	Review first circuit preliminary injunction standard. Calls to Glen Hannington, Esq. and Frederick E. Dashiell, Esq. Call Witness #5. Attend zoom meeting with Glen Hannington, Esq. and Frederick E. Dashiell, Esq.	2.5	$ 700.00	1,750.00	Block Billing	Unnecesary; Mix of Core and Non-Core Tasks
240	3/21/2023	Hannington	Zoom Meeting with Attorneys Gannon and Dahsiell to prepare for hearing	1.8	$ 700.00	1,260.00	Non-Core Task	
241	3/21/2023	Dashiell	Attend zoom conference call with Co-Counsel to prepare for hearing; calls from Co-Counsel and to witnesses.	2	$ 700.00	1,400.00	Block Billing	Insufficient Description
242	3/22/2023	Gannon	Prepare for zoom meeting. Attended meeting with Glen Hannington, Esq., and Frederick E. Dashiell, Esq. Emails to and from attorneys regarding courthouse visit, work schedules, etc.	2.4	$ 700.00	1,680.00	Block Billing	
243	3/22/2023	Hannington	Preparation for hearings	3	$ 700.00	2,100.00	Insufficient Description	

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244	3/22/2023	Dashiell	Attend zoom conference call with Co-Counsel to further prepare for hearings; review emails from and to Co-Counsel; conduct independent review of City District Maps and summaries of demographics.	3.5	$ 700.00	$ 2,450.00	Block Billing	Mix of Core and Non-Core Tasks
245	3/23/2023	Gannon	Review documents for upcoming meeting. Calls to and from Frederick E. Dashiell, Esq. regarding court video, maps and evidence. Texts and emails to and from attorney, Witness #1, Witness #5. Attend zoom meeting, discussion of work schedules, etc.	3.5	$ 700.00	$ 2,450.00	Block Billing	
246	3/23/2023	Gannon	Emails, texts and calls to Frederick E. Dashiell, Esq. and Keith Hayes regarding presentation, uploading evidence, etc.	0.3	$ 700.00	$ 210.00		
247	3/23/2023	Dashiell	Travel to District Court to meet with Clerk to review courtroom protocols and technology facilities; calls from and to Co-Counsel to report on Court visit, video and projection options, use of poster boards; review of trial binder in preparation for zoom meeting and hearings.	5	$ 700.00	$ 3,500.00	Block Billing	
248	3/25/2023	Gannon	Preparation for meeting with witnesses, exhibits, etc. Travel to attend a meeting with witnesses and attorneys.	4.5	$ 700.00	$ 3,150.00	Block Billing	Insufficient Description
249	3/25/2023	Hannington	Preparation for meeting and travel and meeting in person with witnesses and Attorneys	5	$ 700.00	$ 3,500.00	Block Billing	Insufficient Description
250	3/25/2023	Dashiell	Travel to Co-Counsel's office for major witness preparation sessions and run-through of exhibits, documents, opening presentation; preparation of first two witnesses; conduct research of history of City of Boston decennial redistricting for municipal elections.	5	$ 700.00	$ 3,500.00	Block Billing	
251	3/26/2023	Dashiell	Travel to Co-Counsel's office for more witness preparation work; compile trial notebook and exhibits.	3	$ 700.00	$ 2,100.00	Block Billing	Insufficient Description
252	3/27/2023	Gannon	Continue for upcoming motion hearing. Travel to U. S. Federal Court for tech updates in the courtroom. Texts and emails regarding hearing. Attend the zoom meeting with the attorneys.	5	$ 700.00	$ 3,500.00	Block Billing	Insufficient Description
253	3/27/2023	Hannington	Calls with Attorneys Gannon and Dashiell	1.9	$ 700.00	$ 1,330.00	Insufficient Description	Non-Core Task

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254	3/27/2023	Dashiell	Travel to District Court for mandatory all parties meeting with Courtroom Clerk to review courtroom protocols and technology facilities, Judge's local rules and procedures, receive instructions on how to compile binders of case exhibits for trial court and Appeals court; attend special Status Conference to discuss two additional potential conflict of interest matters.	6	$ 700.00	$ 4,200.00	Block Billing	
255	3/27/2023-3/28/2023	Gannon	Zoom meeting with attorneys for witnesses' testimony. Update the binders with exhibits. Call and emails to Glen Hannington, Esq. and Frederick E. Dashiell, Esq. Travel to U.S. Federal Court for the motion hearing, discuss next steps, etc.	7.5	$ 700.00	$ 5,250.00	Block Billing	
256	3/28/2023	Hannington	Discussions with co-counsel re Witness Testimony and coordination of exhibit binder, travel to Court for Hearing, and discuss ongoing strategies with co-counsel	8	$ 700.00	$ 5,600.00	Block Billing	
257	3/28/2023	Dashiell	Preparation of hearing documents and witness outlines for first day of hearings on Plaintiffs' Motion for Preliminary Injunction; travel to Court; presentation of opening argument; direct and re-direct examination of Michael Flaherty.	8	$ 700.00	$ 5,600.00	Block Billing	
258	3/28/2023	Dashiell	Update Court and Counsels' trial binders with exhibits; debrief and review events of hearing; calls and emails to Co-Counsel and prepare for second day of hearings; share email from defendants' counsel Marshall regarding changes to the official Court Exhibits Binder.	3	$ 700.00	$ 2,100.00	Block Billing	Mix of Core and Non-Core Tasks
259	3/29/2023	Gannon	Prepare for hearing. Travel to U.S. Federal Court for the hearing. Confer with attorneys. Call and emails with Glen Hannington, Esq., Frederick E. Dashiell, Esq. and Defendants' attorneys. Meet Witness #3 to discuss the case	6.2	$ 700.00	$ 4,340.00	Block Billing	Mix of Core and Non-Core Tasks
260	3/29/2023	Hannington	Preparation for hearing, travel to Court and attend hearing, then calls and emails with co-counsel to discuss and continue to strategize	6	$ 700.00	$ 4,200.00	Block Billing	Mix of Core and Non-Core Tasks

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261	3/29/2023	Dashiell	Preparation of hearing documents and third witness outline for second day of hearings on Plaintiffs' Motion for Preliminary Injunction; travel to Court; take notes on examination of second witness Rasheed Walters; conduct direct and re-direct examination of third witness Maureen Feeney; update Court and Counsels' trial binders with exhibits; debrief and review events of hearing.	7.85	$ 700.00	$ 5,495.00	Block Billing	Mix of Core and Non-Core Tasks
262	3/29/2023	Dashiell	Calls and emails with Co-Counsel and calls and emails with AV Specialist Keith Haynes and fifth witness Erin Murphy to prepare for third day of hearings.	3	$ 700.00	$ 2,100.00	Block Billing	Mix of Core and Non-Core Tasks
263	3/30/2023	Gannon	Travel to U.S. Federal Court for the hearing; discussion with attorneys after hearing. Calls to Glenn Hannington, Esq. Emails and texts to Glen Hannington, Esq. and Frederick E. Dashiell, Esq. regarding exhibits.	5.5	$ 700.00	$ 3,850.00	Block Billing	Mix of Core and Non-Core Tasks
264	3/30/2023	Hannington	Preparation for hearing, travel to Court and attend hearing, then calls and emails with co-counsel to discuss and continue to strategize, specifically regarding exhibit	5.5	$ 700.00	$ 3,850.00	Block Billing	Mix of Core and Non-Core Tasks
265	3/30/2023	Dashiell	Preparation of fifth witness outline for third day of hearings on Plaintiffs' Motion for Preliminary Injunction; travel to Court; take notes on examination of fourth witness Eleanor F. Kasper; conduct direct and re-direct examination of fifth witness Erin Murphy; update Court and Counsels' trial binders with exhibits; debrief and review events of hearing; briefing of Plaintiff Shillingford and Plaintiff's liaison David Eastmond	7.45	$ 700.00	$ 5,215.00	Block Billing	Mix of Core and Non-Core Tasks
266	3/31/2023	Gannon	Emails to and from Plaintiffs regarding the Facebook posts, meetings, etc. Calls and emails to Glen Hannington, Esq., Frederick E. Dashiell, Esq., and the Boston City Council's attorney regarding videos and thumb drive.	2.2	$ 700.00	$ 1,540.00	Block Billing	Mix of Core and Non-Core Tasks
267	3/31/2023	Hannington	Calls and emails with co-counsel regarding exhibits, specifically video exhibits and ongoing strategy	2	$ 700.00	$ 1,400.00	Block Billing	Non-Core Tasks
268	3/31/2023	Dashiell	Calls and emails with Co-Counsel regarding exhibits, video clips exhibits, and the official trial record.	2	$ 700.00	$ 1,400.00	Block Billing	Non-Core Tasks

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269	4/1/2023	Gannon	Review documents. Prepare binders with exhibits for all. Emails to Defendants' attorneys and Plaintiffs. Texts to Lon Povich, Esq. Spoke to Witness #4 regarding emails. Review forwarded emails. Travel to confer with witness and attend zoom meeting with attorneys.	4.1	$ 700.00	$ 2,870.00	Block Billing	Mix of Core and Non-Core Tasks
270	4/1/2023	Hannington	Coordinate with co-counsel on exhibits and the compilation of the binders by Attorney Gannon, reviewed examils and attended zoom meeting with co-counsel	3.1	$ 700.00	$ 2,170.00	Block Billing	Mix of Core and Non-Core Tasks
271	4/1/2023	Hannington	Zoom with Attorneys Gannon and Dashiell	2.1	$ 700.00	$ 1,470.00	Insufficient Description	Non-Core Tasks
272	4/1/2023	Dashiell	Witness preparation meeting with Co-Counsel Gannon and U.S. Representative Stephen Lynch.	2	$ 700.00	$ 1,400.00		
273	4/1/2023	Dashiell	Attend zoom conference with Co-Counsel and Counselors to review redistricting matters.	2.25	$ 700.00	$ 1,575.00	Insufficient Description	
274	4/2/2023	Gannon	Travel to office to meet councilors. Review emails and documents. Email Boston City Council's attorney and Plaintiff's attorney. Calls to Glen Hannington, Esq., and Frederick E Dashiell, Esq. with update.	2.2	$ 700.00	$ 1,540.00	Block Billing	Mix of Core and Non-Core Tasks
275	4/2/2023	Hannington	Call with co-counsel regarding Attorney Gannon's meeting with counselors	0.5	$ 700.00	$ 350.00	Non-Core Task	
276	4/2/2023	Hannington	Drafted closing arguments	4.5	$ 700.00	$ 3,150.00		
277	4/2/2023	Dashiell	Emails, calls with Co-Counsel regarding exhibits for the official Court binder and emails to Defendants' Counsel to discuss the inclusion of 9 items and revisions to the binders; update report on meeting with Counselors; research caselaw on partisan versus racial gerrymandering.	2.85	$ 700.00	$ 1,995.00	Block Billing	Mix of Core and Non-Core Tasks
278	4/3/2023	Gannon	Review emails and documents for court.	2.5	$ 700.00	$ 1,750.00	Insufficient Description	
279	4/3/2023	Hannington	Preparation for hearing	2.1	$ 700.00	$ 1,470.00	Insufficient Description	
280	4/3/2023	Hannington	Zoom with Attorneys Gannon and Dashiell and witnesses	3.8	$ 700.00	$ 2,660.00	Non-Core Task	
281	4/3/2023	Dashiell	Attend zoom meeting with Co-Counsel and witness in preparation for next hearing.	3.8	$ 700.00	$ 2,660.00	Non-Core Task	
282	4/3/2023	Dashiell	Preparation of hearing documents and sixth witness outline for fourth day of hearings on Plaintiffs' Motion for Preliminary Injunction; travel to Court; conduct direct and re-direct examination of sixth witness U.S. Representative Stephen Lynch; debrief and review events of hearing.	5.5	$ 700.00	$ 3,850.00	Block Billing	Mix of Core and Non-Core Tasks

Table1

Entry #	Date	Person	Description	Elapsed Time	Rate	Total	City's Objection	City's Additional Objections
283	4/4/2023	Gannon	Review documents organized for the zoom meeting. Travel to U.S. Federal Court for the hearing. Attend zoom meeting and discuss closing statements.	7.1	$ 700.00	$ 4,970.00	Block Billing	Mix of Core and Non-Core Tasks
284	4/4/2023	Hannington	Travel to Court, attend hearing, attend zoom meeting after hearing and discuss closing statements	6.9	$ 700.00	$ 4,830.00	Block Billing	Mix of Core and Non-Core Tasks
285	4/4/2023	Dashiell	Preparation of trial notebook and cross-examination outline for fifth day of hearings on Plaintiffs' Motion for Preliminary Injunction; travel to Court; conduct cross-examination of Defendants' expert witness Dr. Moon Duchin; debrief and review events of hearing.	7	$ 700.00	$ 4,900.00	Block Billing	Mix of Core and Non-Core Tasks
286	4/4/2023	Dashiell	Attend zoom conference with Co-Counsel after hearing and discuss closing statement.	1.6	$ 700.00	$ 1,120.00	Non-Core Task	
287	4/5/2023	Gannon	Continue preparation for hearing. Travel to U.S. Federal Court to appear for the hearing. Stipulate to exhibits. Calls and texts to Glenn Hannington, Esq. with results.	6	$ 700.00	$ 4,200.00	Block Billing	Mix of Core and Non-Core Tasks
288	4/5/2023	Hannington	Discussions with co-counsel about the Hearing attended by Attorneys Gannon and Dashiell	1	$ 700.00	$ 700.00	Non-Core Task	
289	4/5/2023	Dashiell	Preparation of trial notebook for sixth day of hearings on Plaintiffs' Motion for Preliminary Injunction; travel to Court; take note on Closing Arguments of parties.	5.5	$ 700.00	$ 3,850.00	Block Billing	
290	4/6/2023	Gannon	Met with Witness #4 regarding Preliminary Injunction. Review emails to and from attorneys, a consultant, Witness #3 and staff. Calls to Witness #6, and Glen Hannington, Esq.	1.7	$ 700.00	$ 1,190.00	Block Billing	
291	4/6/2023	Hannington	Call with Attorney Gannon	0.3	$ 700.00	$ 210.00	Insufficient Description	
292	4/8/2023-4/10/2023	Gannon	Emails to and from attorneys regarding the exhibits for the binder.	0.3	$ 700.00	$ 210.00	Non-Core Task	
293	4/8/2023-4/10/2023	Hannington	Coordinate with co-counsel on final exhibits	0.3	$ 700.00	$ 210.00	Non-Core Task	
294	4/18/2023	Dashiell	Call, text, emails from and to Co-Counsel to review pending matter with Court Clerk; organizing files and exhibit document.	1	$ 700.00	$ 700.00	Block Billing	Clerical Work
295	4/18/2023-4/19/2023	Gannon	Calls, texts and emails texts to Glen Hannington, Esq. and Frederick E. Dashiell, Esq. Review email from court clerk reguarding reply Memo. Emails to and from staff regarding 11/02/22 meeting/video.	1.5	$ 700.00	$ 1,050.00		
296	4/18/2023-4/19/2023	Hannington	Calls, texts and emails with co-counsel, review email from court clerk	1	$ 700.00	$ 700.00	Block Billing	Non-Core Tasks

Table1

Entry #	Date	Person	Description	Elapsed Time	Rate	Total	City's Objection	City's Additional Objections
297	5/8/2023	Dashiell	Receipt and review of Court's Memorandum and Order granting Plaintiffs injunctive relief from racial gerrymandering in violation the 14th Amendment.	1.5	$ 700.00	$ 1,050.00		
298	5/9/2023	Dashiell	Calls and emails with Co-Counsel Memorandum and Order and discussion as to where to go from here.	2	$ 700.00	$ 1,400.00	Non-Core Task	
299	5/9/2023-5/10/2023	Gannon	Calls and emails regarding the decision. Research the decision on the U.S Federal Court's website and printout. Review Honorable Judge Saris' decision.	3.1	$ 700.00	$ 2,170.00	Block Billing	Mix of Core and Non-Core Tasks
300	5/9/2023-5/10/2023	Hannington	Review Hon. Judge Saris' decision, discussion with co-counsel about where to go from here	3.5	$ 700.00	$ 2,450.00	Block Billing	Mix of Core and Non-Core Tasks
301	5/14/2023	Hannington	Zoom with Attorney Dashiell	0.4	$ 700.00	$ 280.00	Insufficient Description	Non-Core Task
302	5/14/2023	Dashiell	Attend zoom conference call with Co-Counsel to review draft settlement proposal that Counsel was planning to present to Defendants.	0.5	$ 700.00	$ 350.00	Non-Core Task	
303	5/15/2023	Dashiell	Call from Co-Counsels Hannington regarding settlement proposal presented to Defendants' Counsel Povich.	0.35	$ 700.00	$ 245.00	Non-Core Task	
304	5/15/2023	Dashiell	Draft text message to Co-Counsel on research regarding Redistricting Maps and settlement options.	0.7	$ 700.00	$ 490.00	Non-Core Task	
305	5/16/2023	Dashiell	Emails and calls from and to Co-Counsel and elected officials and Plaintiffs.	0.5	$ 700.00	$ 350.00	Non-Core Tasks	Insufficient Description
306	5/16/2023-5/17/2023	Gannon	Emails to and from Glen Hannington, Esq., Frederick E. Dashiell, Esq. elected officials and client. Call staff regarding recent events.	0.7	$ 700.00	$ 490.00	Non-Core Tasks	Insufficient Description
307	5/16/2023-5/17/2023	Hannington	Emails with co-counsel and clients	0.5	$ 700.00	$ 350.00	Block Billing	Insufficient Description
308	5/17/2023-5/23/2023	Hannington	Review Motion to Intervene and Memorandum in Support thereof and discuss and strategize with co-counsel	2.5	$ 700.00	$ 1,750.00	Block Billing	
309	5/17/2023-5/24/2023	Dashiell	Review Motion to Intervene and Memorandum in Support and discuss options with Co-Counsel.	1.5	$ 700.00	$ 1,050.00	Block Billing	
310	5/22/2023	Hannington	Drafting Opposition to Motion to Intervene	6.5	$ 700.00	$ 4,550.00		
311	5/23/2023	Gannon	Emails to and from Glen Hannington, Esq. and Frederick E. Dashiell, Esq. regarding Opposition. Review Opposition to Motion to Intervene and the City's reply.	2.5	$ 700.00	$ 1,750.00	Block Billing	Mix of Core and Non-Core Tasks
312	5/23/2023	Hannington	Review City's response to Motion to Intervene	0.5	$ 700.00	$ 350.00		
313	5/24/2023	Gannon	Emails and texts regarding the Boston City Council's vote on map. Discuss the next steps. Contact the Plaintiffs.	0.7	$ 700.00	$ 490.00	Block Billing	Insufficient Description

Table1

Entry #	Date	Person	Description	Elapsed Time	Rate	Total	City's Objection	City's Additional Objections
314	5/24/2023	Hannington	Continue drafting Opposition to Motion to Intervene and file the same with the Court	4.1	$ 700.00	$ 2,870.00		
315	5/24/2023	Hannington	Communication with co-counsel regarding the City Council's vote on the new map	0.7	$ 700.00	$ 490.00	Non-Core Task	
316	5/24/2023	Dashiell	Emails and texts regarding the Boston City Council vote on a new Districting Map.	0.5	$ 700.00	$ 350.00	Non-Core Task	
317	5/26/2023	Gannon	Texts and calls to Glen Hannington, Esq. and Frederick E. Dashiell, Esq. regarding the map, status update to Honorable Judge Saris, next steps, etc. Review draft and comments for the Joint Status Report.	0.9	$ 700.00	$ 630.00	Block Billing	Mix of Core and Non-Core Tasks
318	5/26/2023	Hannington	Texts and calls with co-counsel regarding the new map and next steps	0.9	$ 700.00	$ 630.00	Block Billing	Non-Core Task
319	5/26/2023	Dashiell	Text and calls with Co-Counsel to discuss the new Redistricting Map and next steps Plaintiffs may wish to pursue.	0.9	$ 700.00	$ 630.00	Block Billing	Non-Core Task
320	5/30/2023	Dashiell	Research and Draft revised proposed Joint Status Report on constitutional sufficiency of May 24, 2023, Map and submission to Defendants Counsel.	4.5	$ 700.00	$ 3,150.00		
321	5/31/2023	Dashiell	Text and calls with Co-Counsel to discuss status of Joint Status Report and option to file a separate report; draft email to Defendants' Counsel	1.55	$ 700.00	$ 1,085.00	Block Billing	Non-Core Tasks
322	5/31/2023, 06/02/23	Gannon	Review file. Texts and call to and from Glen Hannington, Esq. and Frederick E. Dashiell, Esq. regarding status of filing. Calls and zoom meeting with Glen Hannington, Esq. regarding the filing of the Status Report.	1.8	$ 700.00	$ 1,260.00	Block Billing	Non-Core Tasks
323	6/1/2023	Hannington	Call with co-counsel regarding Status Report	0.3	$ 700.00	$ 210.00	Non-Core Task	
324	6/1/2023	Dashiell	Calls with Co-Counsel to discuss status of Joint Status Report	1	$ 700.00	$ 700.00	Block Billing	Non-Core Tasks
325	6/2/2023	Hannington	Coordination with Defendants' Counsel on Status Report	0.5	$ 700.00	$ 350.00		
326	6/2/2023	Hannington	Status Report Drafted and filed	2	$ 700.00	$ 1,400.00		
327	6/2/2023	Dashiell	Draft revisions to Status Report to detail the issues raised by Plaintiffs regarding the May 24, 2023, Map.	3	$ 700.00	$ 2,100.00	Unnecessary	Duplicative
328	6/5/2023	Hannington	Review Motion for Leave to File Reply Brief filed by proposed intervenors	1.1	$ 700.00	$ 770.00		
329	6/9/2023	Hannington	Review Court Order	0.2	$ 700.00	$ 140.00	Insufficient Description	
330	6/15/2023	Gannon	Conference call with Glen Hannington, Esq. and Frederick E. Dashiell, Esq. regarding the upcoming status conference with Honorable Judge Saris. Review Status Report and Opposition to Motion to Intervene. Appear via zoom for the status hearing. Discussion on Honorable Judge Saris' comments.	2.5	$ 700.00	$ 1,750.00	Block Billing	

Table1

Entry #	Date	Person	Description	Elapsed Time	Rate	Total	City's Objection	City's Additional Objections
331	6/15/2023	Hannington	Conference call with co-counsel regarding status conference, zoom hearing, later discussion on Judge Saris' comments	2	$ 700.00	$ 1,400.00	Block Billing	
332	6/15/2023	Dashiell	Conference call with Co-Counsel and Court Status Conference Meeting; Court declared case moot and directed parties to confer about any fee claims and an assented to motion to dismiss.	1.5	$ 700.00	$ 1,050.00	Block Billing	
333	6/22/2023	Dashiell	Conference call with Co-Counsel and Defendants' Counsel Lon Povich.	0.3	$ 700.00	$ 210.00	Insufficient Description	
334	6/22/2023	Dashiell	Conference call with Co-Counsel Hannington and Dashiell to discuss next steps.	0.55	$ 700.00	$ 385.00		
335	6/28/2023	Hannington	Emails with co-counsel	0.6	$ 700.00	$ 420.00	Insufficient Description	Non-Core Task
336	6/28/2023-6/29/2023	Gannon	Travel to S.B. Coalition event in Dorchester. Travel to Rockland Trust Bank to deposit all checks. Emails and texts to and from Glen Hannington, Esq. and Frederick E. Dashiell, Esq. and City's attorney.	1.2	$ 700.00	$ 840.00	Block Billing	
337	6/28/2023-6/29/2023	Hannington	Emails and texts with co-counsel and opposing counsel	1.1	$ 700.00	$ 770.00	Block Billing	
338	6/29/2023	Dashiell	Review and revise Joint Status Report and schedule for fee petition and dismissal of case.	4	$ 700.00	$ 2,800.00		
339	7/2/2023	Hannington	Research regarding 42 USC 1988 and other fee-shifting statutes and caselaw regarding the same in preparation of tonight's zoom meeting	4.5	$ 700.00	$ 3,150.00		
340	7/2/2023	Hannington	Zoom meeting with co-counsel regarding fees	0.7	$ 700.00	$ 490.00	Non-Core Task	
341	7/2/2023	Dashiell	Attend zoom conference call with Co-Counsel to review Status Report	0.5	$ 700.00	$ 350.00	Non-Core Task	
342	7/2/2023-7/05/2023	Gannon	Attend zoom meeting regarding upcoming motions. Texts to and from Glen Hannington, Esq., and Frederick E. Dashiell, Esq. regarding billing and motion.	0.8	$ 700.00	$ 560.00	Block Billing	
343	7/7/2023, 7/14/2023, 7/17/2023	Gannon	Review recent articles regarding redistricting decision, filings in U.S. Federal Court, Stipulation, etc. Texts to and from Glen Hannington, Esq., and Frederick E. Dashiell, Esq. regarding Motion to Dismiss.	1	$ 700.00	$ 700.00	Block Billing	
344	7/10/2023	Dashiell	Receipt and review of Joint Status Report with Co-Counsel to review Status Report	1.5	$ 700.00	$ 1,050.00	Non-Core Task	Unnecessary
345	7/11/2023	Gannon	Texts to and from Glen Hannington, Esq., and Frederick E. Dashiell, Esq regarding upcoming 07/14/23 deadline on Motion to	0.2	$ 700.00	$ 140.00	Non-Core Task	
346	7/11/2023	Hannington	Texts with co-counsel regarding deadline for motion to dismiss	0.2	$ 700.00	$ 140.00	Non-Core Task	
347	7/12/2023	Hannington	Research on Prevailing Party status in the First Circuit	2.1	$ 700.00	$ 1,470.00		

Table1

Entry #	Date	Person	Description	Elapsed Time	Rate	Total	City's Objection	City's Additional Objections
348	7/12/2023	Hannington	Zoom with Attorneys Gannon and Dashiell	0.6	$ 700.00	$ 420.00	Insufficient Description	Non-Core Task
349	7/12/2023	Dashiell	Attend zoom conference call with Co-Counsel to review status report	1.6	$ 700.00	$ 1,120.00	Insufficient Description	Non-Core Task
350	7/12/2023-7/13/2023	Gannon	Texts and emails regarding the upcoming 07/14/2023 court deadline on motion. Attend zoom meeting with attorneys regarding the position on the Joint Status Report, edits, etc. Review file for upcoming motion.	1.5	$ 700.00	$ 1,050.00	Block Billing	Non-Core Tasks
351	7/14/2023	Hannington	Texts with co-counsel regarding motion to dismiss	0.2	$ 700.00	$ 140.00	Non-Core Task	
352	7/14/2023	Dashiell	Text and calls with Co-Counsel to discuss Motion to Dismiss	0.2	$ 700.00	$ 140.00	Non-Core Task	
353	7/19/2023	Hannington	Review Court Order	0.2	$ 700.00	$ 140.00	Insufficient Description	
354	7/21/2023	Hannington	Emails with Attorney Fuchs from the city and discussion with co-counse about strategy	1	$ 700.00	$ 700.00	Block Billing	
355	7/21/2023	Dashiell	Email with Defendants' Counsel Fuchs and discussion with Co-Counsel about strategy.	1	$ 700.00	$ 700.00	Block Billing	
356	7/24/2023	Gannon	Prepare for meeting. Attend zoom hearing with Glen Hannington, Esq., and Frederick E. Dashiell, Esq. Email to attorneys for the City regarding a proposed extension of deadline.	1.3	$ 700.00	$ 910.00	Block Billing	Non-Core Tasks
357	7/24/2023	Hannington	Prepare for and attend Zoom meeting with co-counsel	1.5	$ 700.00	$ 1,050.00	Insufficient Description	
358	7/24/2023	Hannington	Begin drafting Fee Petition	4.5	$ 700.00	$ 3,150.00	Non-Core Task	
359	7/24/2023	Dashiell	Attend zoom conference call with Co-Counsel Begin drafting Fee petition.	0.85	$ 700.00	$ 595.00	Block Billing	Non-Core Tasks
360	7/25/2023	Hannington	Emails with Attorney Fuchs and conversations with co-counsel	0.5	$ 700.00	$ 350.00		
361	7/26/2023	Hannington	Review of Joint Request for Extension of Time prepared by Attorney Fuchs and discuss with co-counsel	0.3	$ 700.00	$ 210.00		
362	8/2/2023	Hannington	Discuss settlement via email to Attorney Fuchs	0.2	$ 700.00	$ 140.00		
363	8/2/2023	Hannington	Continue drafting fee petition	2.3	$ 700.00	$ 1,610.00	Non-Core Task	
364	8/3/2023	Hannington	Finalize fee petition	3.1	$ 700.00	$ 2,170.00	Non-Core Task	
365	8/3/2023	Dashiell	Receipt and review of draft fee petition	3	$ 700.00	$ 2,100.00	Non-Core Task	
366	11/10/2023	Hannington	Discussions with Attorney Gannon and Witnesses	0.9	$ 700.00	$ 630.00	Insufficient Description	
367	11/11/2023	Hannington	Research Voting Rights Act and Equal Protection statutes and case law in preparation for drafting Amended Complaint	5.5	$ 700.00	$ 3,850.00		
368	11/12/2023	Hannington	Drafting Amended Complaint, Memorandum in Support of Motion for Preliminary Injunction	8	$ 700.00	$ 5,600.00		
369	11/13/2023	Hannington	Continue Drafting of Amended Complaint and Preliminary Injunction, review of Affidavits and conversations with affiants, compilation of exhibits	8	$ 700.00	$ 5,600.00	Block Billing	
				623.3		$ 436,310.00		

Atty Name	City Proposed Rate	City Proposed Hour Total	Proposed Total Fee Including 50% Reduction	Block-Billed Hours	Non-Core Hours	Insufficient Description Hours	Unnecessary Hours	Duplicative Hours	Action Before Amended Complaint
Hannington	$ 380.00	112.6	$ 42,788.00	77	91.6	47.9	12.9	3.9	8.6
Gannon	$ 380.00	72.3	$ 27,474.00	142.6	106	15.3	0.6	1.5	15.9
Dashiell	$ 420.00	194.7	$ 40,887.00	129.2	114.1	12	8.65	6.75	0

EXHIBIT A

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

SUPERIOR COURT DEPARMTENT
CIVIL ACTION NUMBER:

22-2490 H

ROBERT O'SHEA, CHAIRMAN OF THE WARD 6 DEMOCRATIC COMMITTEE, ET AL,
Plaintiffs

v.

THE BOSTON CITY COUNCIL
Defendant

VERIFIED COMPLAINT FOR PRELIMINARY INJUNCTIVE RELIEF AND TEMPORARY RESTRAINING ORDER

1. The Plaintiff, Robert O'Shea, is the Chairman of the Boston Ward 6 Democratic Committee in South Boston, Massachusetts, and registered voter and resident of South Boston.

2. The Plaintiffs: The South Boston Citizens Association: Martin F. McDonough American Legion Post: St. Vincent's Lower End Neighborhood Association; and the Old Colony Tenant Association are civic associations whose members include residents and registered voters of the City of Boston's South Boston section.

3. The Defendant Boston City Council is an elected municipal body, consisting of the following members: Julia Mejia; Brian Worrell; Ruthzee Louijeune; Ricardo Arroyo; Erin Murphy; Frank Baker; Michael Flaherty; Ed Flynn; Tania Fernandes Anderson; Gabriela Coletta; Liz Breadon; Kendra Lara; and Kenzie Bok.

4. On Oct 10, 2022, four (4) members of the Boston City Council Redistricting Committee and seven (7) members of the Boston City Council met at the Bruce C. Bolling Municipal Building to discuss the topic of Legislative Redistricting in the City of Boston without giving notice pursuant to the Open Meeting Law, Chapter 30A of the Massachusetts General Law.

5. On Oct. 18, 2022, four (4) members of the Boston City Council Redistricting Committee and five (5) members of the Boston City Council were present at City Hall Plaza to meet and discuss the topic of Legislative Redistricting in the City of Boston without giving notice pursuant to the Open Meeting Law, Chapter 30A of the Massachusetts General Law.

6. On Oct. 19, 2022, four (4) members of the Boston City Council Redistricting Committee and seven (7) members of the Boston City Council met at the Condon School in South Boston, MA to discuss the topic of Legislative Redistricting in the City of Boston without giving notice pursuant to the Open Meeting Law, Chapter 30A of the Massachusetts General Law.

7. An Open Meeting Law Complaint, a copy of which is attached hereto as Exhibit "A", based on the violations of MGL.c 30A set forth above was served on both the Clerk of the Boston City Council and the Boston City Council President on October 25, 2022.

8. On October 26, 2022, the Boston City Council met for its regularly scheduled meeting at which it intended to vote on a proposed Redistricting Map.

9. Due to the Open Meeting Law Complaint noted above, the Boston City Council did not proceed with its anticipated vote on any proposed Redistricting Maps at that October 26, 2022 meeting.

10. Although there was mention of the October 25, 2022 filed Open Meeting Law Violations, (Exhibit "A") at that meeting, the Boston City Council neither reviewed any of the alleged violations nor did they review all the proposed remedies listed therein.

11. At the October 26, 2022 meeting, the Boston City Council members only mentioned that they were waiting for their legal counsel to respond to the Complaint.

12. As of this date, the Boston City Council hasn't responded in writing to the Open Meeting Law Complaint filed on October 25, 2022.

13. It's anticipated that other residents of the City of Boston will file additional Open Meeting Law Complaints concerning deliberations on proposed redistricting maps prior to the November 2, 2022 scheduled meeting of the Boston City Council.

14. The Attorney General's Office is in possession of the Open Meeting Law Complaint. Per M.G.L.c. 30A, they will not address the issue until on or after November 24, 2022.

15. Although the Boston City Council has not responded to the Open Meeting Law Complaint, (Exhibit "A"), the Boston City Council has indicated that they plan to vote on a Redistricting Map at their next scheduled meeting on Wednesday, November 2, 2022.

16. Should the Boston City Counsel take a vote on the proposed Redistricting Map prior to responding to the Open Meeting Law Complaint, and prior to the Attorney General's Office response to that Complaint, (which is not required until November 24, 2022), the Plaintiffs will be irreparably harmed, as the remedies pursuant to M.G.L.c. 30A section 23(c) and 23(f) will be insufficient to remedy the Plaintiffs' claims arising out of the deliberations of the elected officials which took place in violation of the Open Meeting Law in advance of any such vote.

17. The Defendant will not be prejudiced in any way from a delay in the vote as the City is under no express statutory deadline to take a vote on this issue at this time, or prior to November 24, 2022.

WHEREFORE, the Plaintiffs respectfully requests this Honorable Court:

1. Issue, on an Ex Parte basis, a temporary restraining order preventing the Defendant, the Boston City Council, from taking a vote on any proposed "Redistricting Plan", (redrawing the City Council Districts), at their next scheduled meeting on Wednesday, November 2, 2022.
2. Issue preliminary injunctive relief in the form of an Order preventing the Defendant, the Boston City Council, from taking a vote on any proposed "Redistricting Plan", (redrawing the City Council Districts), until the Attorney General's Office's response to the Open Meeting Law Complaint filed by the Plaintiffs is issued.
3. Issue a short order of notice for an immediate hearing of Plaintiffs' Request for Preliminary Injunctive Relief as set forth in paragraph 2 above.
4. Grant all other relief which the Court may deem just and proper.

Respectfully submitted,
The Plaintiffs,
By their Attorney,

Paul Gannon, Esquire
Law Office of Paul Gannon, P.C.
546 E. Broadway
South Boston, MA 02127
(617) 269-1993
BBO# 548865
pgannon@paulgannonlaw.com

Dated: November 2, 2022

VERIFICATION

I, Robert O'Shea do state, under the pains and penalties of perjury that I have read this within Verified Complaint and I can state that the facts set forth are true to the best of my knowledge, and that no material facts have been omitted therefrom.

Signed this 2nd day November, 2022.

Robert O'Shea

3

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

SUPERIOR COURT DEPARMTENT
CIVIL ACTION NUMBER:
22-2490 H

ROBERT O'SHEA, CHAIRMAN OF THE WARD 6 DEMOCRATIC COMMITTEE, ET AL,
Plaintiffs

v.

THE BOSTON CITY COUNCIL
Defendant

SUFFOLK SUPERIOR COURT
CIVIL CLERK'S OFFICE
2022 NOV -2 A 11:11
MICHAEL JOSEPH DONOVAN
CLERK / MAGISTRATE

PLAINTIFFS' EMERGENCY EX PARTE MOTION FOR A TEMPORARY RESTRAINING ORDER AND MOTION FOR PRELIMINARY INJUNCTION, AND MOTION FOR SHORT ORDER OF NOTICE

Now comes the Plaintiffs in the above-captioned matter and hereby requests this Court issue, **Ex Parte**, Plaintiffs' request for a Temporary Restraining Order and grant, following a hearing, Plaintiffs' request for Preliminary Injunctive Relief as set forth in the Verified Complaint filed herewith. In support thereof the Plaintiffs rely upon the facts set forth in the Verified Complaint, and the facts set forth in the Affidavit of Robert O'Shea submitted herewith.

The Plaintiffs further state the Plaintiffs would suffer irreparable harm if the temporary restraining order was not granted. Further the Defendant contends that that the Plaintiffs have a reasonable likelihood of success on the merits of this dispute, (as set forth in the Verified Complaint, and the Open Meeting Law Complaint attached as Exhibit "A" thereto), and that the balancing of the equities in this matter favor granting the requested relief.

STANDARD

A temporary restraining order/preliminary injunction shall issue if when the moving party establishes: (a) that they have a substantial likelihood of success on the merits; (b) that there exists a substantial threat of irreparable harm should the injunction not be granted; and (c) that a threat of an injury to Plaintiffs in the absence of the injunction outweighs the risk of harm to the Defendant if the injunction is granted. See Packaging Industries Group, Inc. v. Cheney, 380 Mass. 609, 616, 621-622, 405 N.E.2d 106 (1980). An injunction may issue only if the judge concludes that the risk of irreparable harm to a plaintiff, in light of his chances of success on his claim, outweighs the defendant's probable harm and likelihood of prevailing on the merits of the case. John T. Callahan & Sons, Inc. v. City of Malden, 430 Mass. 124, 131, 713 N.E.2d 955 (1999), citing Commonwealth v. Mass. CRINC, 392 Mass. 79, 87-88, 466 N.E.2d 79 (1984). The burden is on the party seeking the injunction. Lanier v. Mass. Parole Board, 396 Mass. 1018, 489 N.E.2d 670 (1986) (rescript); Robinson v. Secretary of Administration, 12 Mass.App.Ct. 441, 425 N.E.2d 772 (1981).

In this case the Plaintiffs seek only time for the statutory procedure and remedies set forth in M.G.L. c. 30A section 23 to take their due course. The Plaintiffs have established a reasonable likelihood that their claims, (as set forth in their Open Meeting Law Complaint), have a reasonable likelihood of success. If so, the Attorney General's Office can and may take action on the Complaint to address the violations as allowed by Chapter 30A section 23(c). Should the Attorney General's Office take no action, the Plaintiffs could, and would, proceed to enforce the provisions of the Open Meeting Law pursuant to Chapter 30A section (f). Section 23(b) of Chapter 30A, however, has a thirty (30) day waiting period during which the public body, (the Defendant, the Boston City Council), has time to discuss and respond in writing to any alleged violations.

As set forth in the Verified Complaint, the Council has not properly reviewed and/or responded in writing to the allegations set forth in the Open Meeting Law Complaint to date. The Plaintiffs simply seek to restrict the Council from voting on a Redistricting Plan when the deliberations leading up to such vote may reasonably be found to have been in violation of the Open Meeting Law. If the vote takes place prior to the procedure and remedies set forth in Chapter 30A section 23 are allowed to run their course, then any remedial measures deemed appropriate would be inadequate.

On the other hand, in balancing the equities of the circumstances, the Council is under no statutory deadline to take a vote on this matter at this time, or at any time certain in the future. Any such deadline set by the Council is self- imposed for politically expedient reasons, not for any urgent public good. Neither the Council, nor the public's interest, will be prejudiced by a delay in any such vote. In fact, the public interest will be well served by requiring the Council to comply with the provisions of Chapter 30A by responding to the Plaintiffs' Open Meeting Law Complaint in a timely fashion, and allowing the Attorney General's Office adequate time to review the Complaint and Response and take appropriate action.

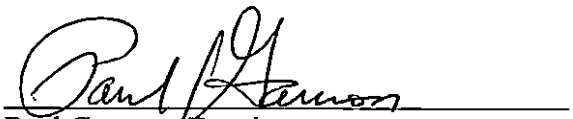
WHEREFORE, the Plaintiffs respectfully requests this Honorable Court:

1. Issue, on an Ex Parte basis, a temporary restraining order preventing the Defendant, the Boston City Council, from taking a vote on any proposed "Redistricting Plan", (redrawing the City Council Districts), at their next scheduled meeting on Wednesday, November 2, 2022.

2. Issue preliminary injunctive relief in the form of an Order preventing the Defendant, the Boston City Council, from taking a vote on any proposed "Redistricting Plan", (redrawing the City Council Districts), until the Attorney General's Office's response to the Open Meeting Law Complaint filed by the Plaintiffs is issued.

3. Issue a short order of notice for an immediate hearing of Plaintiffs' Request for Preliminary Injunctive Relief as set forth in paragraph 2 above, for a date prior to the Boston City Council's next scheduled meeting on Wednesday, November 9, 2022.

Respectfully submitted,
The Plaintiffs,
By their Attorney,



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Dated: November 2, 2022

EXHIBIT B

VM

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

SUPERIOR COURT DEPARMTENT
CIVIL ACTION NUMBER:2284CV02490

ROBERT O'SHEA, Individually and as Chairman of the Ward 6 Democratic Committee, RITA DIXON, SHIRLEY SHILLINGFORD, MAUREEN FEENEY, PHYLLIS CORBITT, Individually and as President of the Massachusetts Union of Public Housing Tenants, THE SOUTH BOSTON CITIZENS ASSOCIATION, MARTIN F. MCDONOUGH AMERICAN LEGION POST, ST. VINCENT'S LOWER END NEIGHBORHOOD ASSOCIATION, and OLD COLONY TENANT ASSOCIATION,

Plaintiffs,

v.

THE BOSTON CITY COUNCIL,

Defendant.

FIRST AMENDED COMPLAINT

Plaintiffs bring this action to challenge the decision of the Defendant Boston City Council approving redistricting plans which violate the Boston City Charter, The Voting Rights Act, and the Fourteenth Amendment to the United States Constitution. Plaintiffs also contend that the action taken by the Defendant was in violation of the Massachusetts Open Meeting Law.

PARTIES

1. Plaintiff Robert O'Shea is the Chairman of the Boston Ward 6 Democratic Committee in South Boston, Massachusetts, and registered voter, taxpayer and resident of South Boston.

2. Plaintiff Rita Dixon is a registered voter, taxpayer and resident of Mattapan.

3. Plaintiff Shirley Shillingford is a registered voter, taxpayer and resident of the Mission Hill neighborhood of Roxbury and is the Vice Chair of the Caribbean American Political Action Committee.

4. Plaintiff Maureen Feeney is a registered voter, taxpayer and resident of Dorchester.

5. Plaintiff Phyllis Corbitt is the President of the Massachusetts Union of Public Housing Tenants and a registered voter, taxpayer and resident of South Boston.

6. Plaintiffs The South Boston Citizens Association, Martin F. McDonough American Legion Post. St. Vincent's Lower End Neighborhood Association and the Old Colony Tenant Association are civic associations whose members include residents and registered voters of the City of Boston's South Boston section.

7. The Defendant Boston City Council is an elected municipal body, consisting of the following members: Julia Mejia; Brian Worrell; Ruthzee Louijeune; Ricardo Arroyo; Erin Murphy; Frank Baker; Michael Flaherty; Ed Flynn; Tania Fernandes Anderson; Gabriela Coletta; Liz Breadon; Kendra Lara; and Kenzie Bok.

JURISDICTION AND VENUE

8. This Court has jurisdiction in this case pursuant to M.G.L. c. 212 § 4.

9. This Court has jurisdiction over the Open Meeting Law claims pursuant to M.G.L. c. 30A § 23(f).

10. Venue is proper here as the Defendant is the Boston City Council and all of the Plaintiffs are residents of the City of Boston.

STATEMENT OF FACTS

11. Councilor Liz Breadon became the Chair of Redistricting on August, 29, 2022.

12. Councilor Brian Worrell was simultaneously named as Vice Chair of Redistricting.

13. At a City Council meeting on August 31, 2022, Councilor Breadon filed an order for a hearing regarding Redistricting Principles. Exhibit A.

14. The City Council thereafter had a "Redistricting Working Session" on September 20, 2022 regarding the adoption of City Council redistricting principles.

15. Another City Council meeting was held on September 23, 2022 via Zoom, again regarding the adoption of redistricting principles.

16. On September 26, 2022, the City Council held a working session in an effort to allocate split precincts to their appropriate district.

17. Similar meetings were held throughout the remainder of that week, both regarding the allocation of split precincts and regarding the adoption of redistricting principles.

18. On September 28, 2022, Councilor Breadon Filed an Amended Order for the Adoption of City Council Redistricting Principles. Exhibit B.

19. At the meeting on September 28, 2022, Councilor Ricardo Arroyo and Councilor Tania Fernandes Anderson filed a proposed map (Exhibit C), as did Councilor Erin Murphy (Exhibit D)

20. On October 3, 2022 Councilors Breadon and Worrell filed their proposed map (Exhibit D).

21. On Oct 10, 2022, four (4) members of the Boston City Council Redistricting Committee and seven (7) members of the Boston City Council met at the Bruce C. Bolling Municipal Building to discuss the topic of Legislative Redistricting in the City of Boston without giving notice pursuant to the Open Meeting Law, Chapter 30A of the Massachusetts General Law.

22. The October 10, 2022 meeting was an "emergency meeting" held by the NAACP, the Chinese Progressive Association, and other advocacy groups.

23. On Oct. 18, 2022, four (4) members of the Boston City Council Redistricting Committee and five (5) members of the Boston City Council were present at City Hall Plaza to meet

and discuss the topic of Legislative Redistricting in the City of Boston without giving notice pursuant to the Open Meeting Law, Chapter 30A of the Massachusetts General Law.

24. On Oct. 19, 2022, four (4) members of the Boston City Council Redistricting Committee and seven (7) members of the Boston City Council met at the Condon School in South Boston, MA to discuss the topic of Legislative Redistricting in the City of Boston without giving notice pursuant to the Open Meeting Law, Chapter 30A of the Massachusetts General Law.

25. At the October 19, 2022, the City Council voted to adopt the amended version of Councilor Breadon's Order for the Adoption of City Council Redistricting Principles.

26. On October 20, 2022, there was a meeting to hear public testimony regarding the redistricting from residents.

27. The meeting was held in Fields Corner at the Community Academy for Science and Health, which is in the heart of the Vietnamese-American community.

28. However, the Council provided no translation services which prompted complaints from the CDVN Vietnamese American Community of MA. Exhibit F.

29. The CDVN complaint that "the Vietnamese community in Dorchester stands to be impacted like all immigrant communities by the Redistricting legislation . . . [d]espite this, the Council has not provided the typical language access that is provided for meetings of even lesser consequence." Id.

30. Similarly, Sarepta Women and Children Empowerment Center, Inc. wrote to Mayor Wu alleging disenfranchisement of the Haitian Community of Dorchester, Hyde Park, and Mattapan which would be "eviscerated" by the new redistricting legislation. Exhibit G.

31. The Mary Ellen McCormack Task Force has similar complaints regarding the division of public housing developments, and the lack of language access. Exhibit H.

32. Specifically, the Mary Ellen McCormack Community Task Force complained that the Redistricting Plan divides historically united public housing developments and asked Mayor Wu to send the plan back to the City Council "with an amendment to unite Boston's neighborhoods including South Boston's public housing developments into District 2 where they had historically been." Id.

33. The Task Force further stated that "[d]ividing our communities is a violation of our voting rights and cannot stand to pass." Id.

34. South Boston En Accion ("SBEA") also wrote to Councilor Breadon on November 1, 2022, on behalf of the Spanish-speaking residents of Mary Ellen McCormack, Old Colony and West Broadway Developments and their "questions, concerns, and frustrations" regarding the redistricting process. Exhibit I.

35. SBEA noted that "language access has not been a priority" and that "[w]hen attempts were made to translate for residents, the interpretations were disrupted." Id.

36. SBEA further noted that many of the Spanish-speaking residents of these public housing developments "don't know what is occurring and are confused about their next steps." Id.

37. Lastly, SBEA disagrees with the splitting of public housing developments into different districts, noting that "[o]ur community is made up of the most vulnerable residents, and dividing us will create more chaos and harm." Id.

38. An Open Meeting Law Complaint based on the violations of MGL. C. 30A set forth above was served on both the Clerk of the Boston City Council and the Boston City Council President on October 25, 2022.Exhibit J – Affidavit of Robert O'Shea and Open Meeting Law Complaint.

39. On October 26, 2022, the Boston City Council met for its regularly scheduled meeting at which it intended to vote on a proposed Redistricting Map.

40. Due to the Open Meeting Law Complaint noted above, the Boston City Council did not proceed with its anticipated vote on any proposed Redistricting Maps at that October 26, 2022 meeting.

41. Although there was mention of the October 25, 2022 filed Open Meeting Law Violations, (Exhibit J) at that meeting, the Boston City Council neither reviewed any of the alleged violations nor did they review all the proposed remedies listed therein.

42. At the October 26, 2022 meeting, the Boston City Council members only mentioned that they were waiting for their legal counsel to respond to the Complaint.

43. On November 2, 2022, the Boston City Council responded in writing to the Open Meeting Law Complaint filed on October 25, 2022.

44. It's anticipated that other residents of the City of Boston will file additional Open Meeting Law Complaints concerning deliberations on proposed redistricting maps prior to the November 2, 2022 scheduled meeting of the Boston City Council.

45. In fact, another Open Meeting Complaint was filed on November 1, 2022 on behalf of Dorchester Civic Associations. Exhibit K.

46. The Attorney General's Office is in possession of the October 25, 2022Open Meeting Law Complaint. Per M.G.L. c. 30A, they will not address the issue until on or after November 24, 2022.

47. Despite several Open Meeting Law complaints and many complaints from minority communities that were shut out of the legislative process, the Boston City Council still pressed ahead to a vote Wednesday, November 2, 2022.

48. The proposed map to be voted on was proposed by Councilors Breadon and Arroyo. Exhibit L.

49. The Councilors reviewed a committee report and a copy of the proposed map less than forty-eight (48) hours before taking a vote, leaving minimal time to digest a redistricting plan that would shape the future of the City for the next decade.

50. Despite all of these issues, on November 2, 2022, the City Council voted in favor of the Legislative Redistricting by a vote of 9 to 4.

51. Councilor Flaherty submitted a proposed map (Exhibit M), as did Councilor Baker (Exhibit N), but neither of these proposals was discussed or seriously considered by the Council, who were laser focused on passing the map submitted by Councilors Breadon and Arroyo at any cost.

52. Previously, on October 9, 2022, Professor Jeffery Wice of New York Law School was retained by the City of Boston to provide a memorandum outlining the criteria which the City Council must or should consider when redrawing council districts. Exhibit O.

53. Professor Wice discussed that Section 128 of the Boston City Charter requires that districts "shall be compact and contain, as nearly as may be, an equal number of inhabitants as determined but the most recent state decennial census, shall be composed of contiguous existing precincts, and shall be drawn with a view toward preserving the integrity of existing neighborhoods."Id.

54. However, Massachusetts no longer conducts a state decennial census; therefore the necessary date for redrawing legislative districts is drawn from the 2020 Federal Census.

55. The data from the 2020 Census as applied to the City of Boston dictates that the ideal district size is 75,071 residents, plus or minus 5%.

56. Therefore, the range allowed per district is between 71,317.45 and 78,767.85 residents.

57. The Voting Rights Act ("VRA") also prohibits the imposition of any voting qualification, practice or procedure that results in the denial or abridgement of any citizen's right to vote on account of race, color, or status as a member of a language minority group.

58. Section 2 of the VRA further prohibits vote dilution by "cracking" minority populations across districts, just as it prohibits vote dilution by "packing" minority populations into one district.

59. The Fourteenth Amendment to the Constitution of the United States and the VRA require the avoidance of both discriminatory intent and discriminatory effect when redistricting.

60. The City Charter and the VRA require districts to also be "compact" meaning that there should be a minimum distance between all parts of the district and to be "contiguous" meaning that all precincts should be geographically connected.

61. Last, but not least, it is required that consideration must be given to drawing districts that respect the boundaries of Boston's recognized neighborhoods in order to preserve historical neighborhood boundaries.

62. The City Council redistricting process was flawed and unfair to the most vulnerable residents of the City, particularly public housing residents, immigrants, and language minorities. Exhibit P – Affidavit of Edward Flynn at ¶ 2.

63. The City Council did not engage residents in an effective way, and failed to listed to or engage residents in public housing developments, immigrants, and language minorities. Id. at ¶ 3.

64. Communities of color had almost no involvement in the City Council's secretive process. Id. at ¶ 4.

65. Throughout the redistricting debate, Councilor Flynn repeatedly informed his colleagues on the council that one of his most important goals was to ensure public housing residents were united in District 2. Id. at ¶ 5.

66. Keeping the public housing residents united was and is an important goal because being united in one district allows public housing residents' collective voice to be heard in government. Id. at ¶ 6.

67. In District 2, residents at the Anne Lynch Homes at Old Colony, the West 9th Apartments, and the West Broadway Development are all a short walk from each other and have much in common. Id. at ¶ 7.

68. However, under the approved redistricting plan, these public housing developments would move from District 2 to District 3. Id. at ¶ 8.

69. Under the previous version of the Breadon-Arroyo Map, the plan was to divide public housing developments in half, both at the Anne M. Lynch Homes (al The previous version of the Breadon-Arroyo map proposed to divide public housing developments in half - both at the Anne M. Lynch Homes (along Mercer St.) and the West Broadway Development (along Orton Marotta Way) into District 2 and District 3. Id. at ¶ 9.

70. At that time, public housing advocates like South Boston En Accion, BHA Task Force leaders, nonprofit partners, and all civic groups in South Boston voiced complete opposition to a proposal that would divide our public housing developments from District 2, and dilute the voice of communities of color to organize and advocate for their interests. Id. at ¶ 10.

71. The approved map still divides public housing in South Boston. The version of the map made available to the Councilors only two days before the November 2nd vote completely cut out these developments from District 2, the Council district where these developments have traditionally been located. Id. at ¶ 11.

72. And in the last hours before the vote, West Broadway was added into District 2, still dividing public housing developments into two districts. Id. at ¶ 12.

73. It is critical residents of color in Boston Housing Authority units are not further divided from the community of South Boston. Id. at ¶ 13.

74. These public housing developments, managed by the Boston Housing Authority, are mostly made up of communities of color and immigrants. Id. at ¶ 14.

75. During the pandemic, Councilor Flynn and his staffed worked closely with neighbors in District 2's public housing developments on language and communication access, senior outreach, food access, access to COVID-19 testing, providing information on vaccines, support for immigrant families, social services, youth, educational and athletic programs. Id. at ¶ 15.

76. Placing these residents out of District 2 punishes these public housing residents and dilutes their organizing power. Id. at ¶ 16.

77. Language and communication access are critical issues that unite residents in public housing developments. Id. at ¶ 17.

78. In District 2, many residents in public housing speak Spanish and an increasing number also speak Cantonese. Id. at ¶ 18.

79. Both of these languages directly unite the history and residents of District 2, with a large Cantonese speaking community in Chinatown, the South End and Bay Village. Id. at ¶ 19.

80. The larger Spanish speaking community in the South End, such as Cathedral Public Housing and Villa Victoria, also have much in common with the public housing residents in South Boston that also speak Spanish. Id. at ¶ 20.

81. However, the City Council, with its approved map, failed to engage these residents in the redistricting process. Id. at ¶ 21.

82. It is unconscionable to separate these public housing developments from District 2, the Council district where these developments have traditionally been located. Id. at ¶ 22.

83. These actions are wholly contrary to the redistricting principles that we discussed at length with experts and academics when it comes to the preservation of the core of prior districts and maintaining communities of interest. Id. at ¶ 23.

84. Our public housing developments have a large number of Hispanic and Black residents, and they contribute greatly to the diversity of South Boston and District 2. Id. at ¶ 24.

85. These developments have always been in District 2, and they identify with the neighborhood of South Boston. Id. at ¶ 25.

86. Removing them completely, and separating them from the rest of South Boston, makes District 2 less diverse. Id. at ¶ 26.

87. The Redistricting Committee ignored the requests from community groups to hold additional meetings in Cantonese, Spanish, Vietnamese, and Haitian Creole, and went ahead with a vote on November 2nd. Id. at ¶ 27.

88. The deadline of having a map in place by November 7th was an artificial and self-imposed one. Id. at ¶ 28.

89. According to the City of Boston Corporation Counsel, the only explicit statutory deadline set forth in the Boston City Charter is that City Council districts be redrawn by August 1, 2026.Id. at ¶ 29.

90. Moreover, the Council did not know what the exact map was when there were plans to vote on October 26, 2022and they still did not know the exact map until a few hours before the vote on November 2, 2022. Id. at ¶ 30.

91. Both the public and Councilors voting on the maps had not been afforded an opportunity to view or offer feedback in a public hearing on a final map, and there were also no further meetings, hearings, or working sessions after October 25th. Id. at ¶ 31.

92. The Council and the public did not have the opportunity to discuss the latest version of the Breadon-Arroyo map, and nobody knew what were the amendments that made it into this version that the Council was supposed to vote on. Id. at ¶ 32.

93. Councilors also did not have the chance to have their constituents have further input. Id. at ¶ 33.

94. District 2 and District 3 had the most stake in this redistricting process and, yet, the final map had not taken into serious consideration the voices of the communities in these districts. Id. at ¶ 34.

95. Despite the insistence that this would strengthen these districts, there is no doubt that these districts will suffer from losing some core communities that are not preserved from prior districts, as well as not maintaining communities of interest. Id. at ¶ 35.

96. More time was spent by the Council with the advocates of the so-called UNITY map, some of whom may not live in the City of Boston, than listening to the voices of the communities that will bear the brunt of the irreparable harm that this redistricting will cause. Id. at ¶ 36.

97. Council President Flynn tried to offer support for the recommended criteria to be formally considered and adopted by our body. Id. at ¶ 37.

98. Councilor Flynn argued that already established communities of interest, such as public housing residents, should be respected, united and factored in. Id. at ¶ 38.

99. Councilor Flynn's request was denied, as was his request to hold off on a vote and to seek more community meetings in various languages. Id. at ¶ 39.

100. The process lacked transparency and it was completely flawed. Id. at ¶ 40.

101. The Council failed as a collective body to respect the most impacted by our decision; residents living in public housing and our immigrant neighbors. Id. at ¶ 41.

102. They failed as a city to include the voices and opinions of communities of color, immigrants and public housing residents during the districting debate. Id. at ¶ 42.

103. The current map that was approved, and the process that led to it, has not done right by the neighbors living in my district in public housing in South Boston, and the rushed process was not done right for the residents across the City of Boston. Id. at ¶ 43.

104. Councilor Baker contends that the map the Boston City Council approved on November 2, 2022, and the actions taken by his colleagues on the City Council indicate that the goal of the redistricting map is to split up the southeastern part of District Three, even though there is no Voting Rights Act violation. Exhibit Q – Affidavit of Frank Baker at ¶ 2

105. Communities of interest in other parts of the City were a non-starter when it came to being moved; however the southeastern part of Dorchester was not offered the same privilege. Id. at ¶ 3.

106. The redistricting process was disingenuous and was at the expense of marginalized communities that have been organized and worked together for decades. Id. at ¶ 4.

107. District 3 contains a cohesive network of civic groups that has traditionally banded together under common interests such as schools, churches, safe streets, developments, billboards, libraries and other public programs. Id. at ¶ 5.

108. Those civic groups are anchored in District 3's villages which happen to coincide with parish boundaries. Id. at ¶ 6.

109. These communities from St. Margaret's to St. Brendan's and everything in between play sports together - Dorchester Youth Hockey, Dorchester Baseball, Dorchester Youth Soccer and in times of need, unite together for a common cause, in places like Florian Hall. Id. at ¶ 7.

110. There is a complete disruption of District 3, by removing the core of its district from its historical home – something of which does not need to happen. Id. at ¶ 9.

111. District 3 is a community that is integrated, supportive, and diverse, who share resources and services, but will now be split apart from one another – Carney Hospital, Eileen's Recovery House for Women, Olmstead designed Dorchester Park and especially the Neponset River Greenway, Pope John Paul II Park and Joseph Finnegan Park. Id. at ¶ 10-11.

112. The aforementioned parks came to fruition as a direct result of the civic groups in these communities advocating, in concert, for decades. Id. at ¶ 11.

113. Under Docket #1275 there are no clear boundaries for District Three, unlike previous redistricting years (1983, 1993, 2003, 2013) Dorchester Avenue and the Neponset River are not just boundaries but also are common interests on important issues facing the City of Boston including transportation, business, and environment concerns including coastal flooding. Id. at ¶ 12.

114. These two boundaries give District Three common interests from South to North. Id. at ¶ 13.

115. The purpose of redistricting should be more than just balancing populations, but must also take into account the existing structure of neighborhoods and avoid splitting up neighborhood unless absolutely necessary. Id. at ¶¶ 14-15.

116. The proposed maps offered by Councilors Baker, Flynn, Murphy and Flaherty all provide a means by which population can be equalized with minimal damage to the communities. Id. at ¶ 16.

117. The proposed map not only destroys District 3, but also causes significant harm to other communities, including South Boston which will be carved in half, and Mattapan, which will dilute the African-American voting power in District 4. Id. at ¶ 17.

118. The approved map not only dilutes a moderate vote and breaks up Ward 16, it will also adversely affect the African-American vote in District Four for no reason. Id. at ¶ 18.

119. Plaintiff Ruth Dixon specifically believes that dividing her Mattapan neighborhood in half is against the City Charter and her voting rights, making it impossible to elect the candidate of her choice because rather than be a united community with an ability to influence their city councilor we will be divided on the edge of 2 districts.

120. Similarly, Plaintiff Shirley Shillingford believes that the Redistricting Plan will divide the Afro-Caribbean community in and around Mission Hill in Roxbury, diluting the voice of the Afro-Caribbean community. Under the Redistricting Plan, Mission Hill would be represented by Kenzie Bok who is the councilor for District 8 which is largely comprised of Beacon Hill. District 8 and Mission Hill have a 30-year life expectancy gap, and wildly different populations.

121. There has been no racial polarization regarding voting in the City, as was confirmed by Professor Wice, as can be seen from Councilor Baker's re-election in his 63% non-white district, in the election of Secretary Galvin in the African-American majority of District 4, and in various other elections throughout the City. Id. at ¶ 20.

122. Hundreds of emails were sent to the Council from residents throughout District Three, but their voice and concerns fell on deaf ears. Id. at ¶ 21.

123. Councilor Erin Murphy avers that the approved map is primarily focused on race in violation of the Voting Rights Act and the Fourteenth Amendment. Exhibit R – Affidavit of Erin Murphy at ¶ 2.

124. The approved map does not focus on creating voting opportunity neighborhoods for particular minority groups but instead focuses on the non-white populations as if it were a homogeneous group in each City Council District. Id. at ¶ 3.

125. The approved map focuses on City Council District 3 as being "too white". Id. at ¶ 4.

126. The approved map does not distinguish between different minority groups but added all minority group's total populations without regard for the vast differences in background, language, history, voting strengths etc., in order to achieve "racial balance". Id. at ¶ 5.

127. The approved map dismantles the compact City Council District 3 boundary along Dorchester Ave and substitutes a gerrymandered, wandering boundary in order to achieve "racial balancing". Id. at ¶ 6.

128. The approved map is designed to diminish the voting power of white voters in City Council District 3. Id. at ¶ 7.

129. The approved map destroys the Cedar Grove neighborhood ignoring the requirement to preserve existing communities of related and mutual interest solely in order to achieve "racial balancing". Id. at ¶¶ 8-9.

130. The stated goal of the approved map is to make District 4 less black and District 3 less white. Id. at ¶ 11.

131. Councilor Breadon expressed fear that the majority black population of District 4 could invite accusations of "packing" which is the term used to describe the practice of drawing district lines so that minority voters are compressed into a small number of districts when they could effectively control more. Id. at ¶ 12.

132. Using this reasoning, the approved map swaps majority black precincts in District 4 with majority white precincts in District 3 in order to make District 4 less black and District 3 less white. Id. at ¶ 13.

133. District 3, under the existing plan before redistricting, does not have a majority race, and there is no evidence whatsoever that the widely diverse groups of American blacks, Vietnamese, Cape Verdean, Haitian and Dominican people in District 3, that is the non-white people, are a cohesive minority and they are surely not a single minority. Id. at ¶ 14.

134. However, the precincts that comprise the Cedar Grove neighborhood are majority white neighborhoods. Id. at ¶ 15.

135. Using a "racial balancing" criteria, the approved map carves these precincts out of District 3 purely on the basis of race. Id. at ¶ 16.

136. This is an example of "cracking" which is the practice of drawing District boundaries that split or fracture voting groups to diminish their ability to elect officials that represent their interests. Id. at ¶ 17.

137. District 3, under the existing plan before redistricting and termed "too white" by the Council, has a history of electing black officials. Linda Dorcena Forrey was elected as the State Representative in 2004 and reelected until 2012 when she was elected as State Senator. She was reelected until 2018 when she retired from politics. The specific precincts that the approved map carves out of District 3 voted overwhelmingly in the 2022 primary for Attorney General candidate Andrea Campbell, a black woman. Id. at ¶ 18-19.

138. Also, District 4's black majority (also attacked and diluted by the approved map) has created a significant political power base for the black community resulting in electing black councilors for over four decades along with a U.S Representative, State Senators and State Representatives. Id. at ¶ 20.

139. Councilor Breadon stated at the October 5, 2022 City Council meeting that her goal was to "racially balance" District 3 so that it becomes a majority minority district. Id. at ¶ 21.

140. The approved map achieves this unconstitutional "racial balancing" by pretending that all non-white citizens of Boston belong to a homogeneous group that has one set of political goals and that each and every member is opposed to all of their white neighbors, their views, and their political goals. Id. at ¶ 22.

141. The Little Saigon neighborhood is a vital part of District 3 that spans Dorchester Avenue in the Fields Corner neighborhood of Dorchester. It is a vibrant area and is home to 75% of Vietnamese Americans in the city of Boston. These neighbors are mostly first and second-generation immigrants from a country in south East Asia, with a rich culture, extremely strong family and religious values, and a deep commitment to education. Id. at ¶ 25.

142. The first black community of Dorchester came almost exclusively from the southern states fleeing discrimination and poverty in the 1960's. These were the descendants of slaves and came north for work and to escape Jim Crow laws. In 1965 a new wave of blacks arrived in Dorchester: Haitians, Cape Verdeans, West Indians and Dominicans. Although they shared a skin color with the recently settled Southern blacks, in all other respects they were a widely diverse group with little in common: an eclectic mix of languages, religions, native countries, education levels, goals and aspirations. Id. at ¶ 26.

143. The approved map lumps all of these divergent people into one category calling them non-white, or people of color, or minority. Id. at ¶ 27.

144. The approved map divides District 3 into two groups: white and non-white, ignoring the immense differences in each of the categories. There is no cohesive history, ethnicity, religion, language, or culture that binds them into a recognizable group with a compact and united neighborhood that should create an opportunity neighborhood. Id. at ¶ 28.

145. The goal of equal population distribution across districts could have been achieved without damaging the existing neighborhood in Districts 2, 3, and 4, and without an improper focus on "racial balancing" as the driving force behind redistricting. Id. at ¶ 29.

146. The proposed maps provided by Councilors Murphy, Flynn, Baker, and Flaherty all achieve the goals of redistricting with minimal impact to neighborhood cohesiveness and without an improper focus on race. Id. at ¶ 30.

147. United States Congressman Stephen Lynch also wrote to this Honorable Court regarding the unconstitutional nature of the redistricting legislation. Exhibit S.

148. Specifically, Congressman Lynch stated that "the City Council proposal will arbitrarily and recklessly divide longstanding and close-knit public housing developments – including the Anne M. Lynch Homes at Old Colony and West Broadway development – across multiple city districts."

149. Congressman Lynch further stated that "these public housing communities are communities of common interest whose abrupt division into multiple city districts will unfairly and irreparable dilute their voting power and encumber them with unfamiliar and disparate political representation."

150. Congressman Lynch urges the Court to consider the "preservation of neighborhoods and communities" and notes that "[t]he failure to safeguard these communities against division not only neglects to preserve the cores of the preexisting districts but could very well have the potential to weaken the voting strength of these politically cohesive and like-minded voters in future City Council elections."

COUNT I – INJUNCTIVE RELIEF

151. Paragraphs 1 through 150 of this Complaint are hereby incorporated by reference.

152. The Boston City Council failed to comply with the Open Meeting Law by having secretive meetings and not providing adequate language access to non-English speakers.

153. Furthermore, the final map approved by the City Council was not provided to the public or the Councilors until less than 48 hours before the scheduled vote.

154. Because the public did not have broad access to the deliberations and decision-making process of the City Council regarding the redistricting process, Plaintiffs respectfully request that this Honorable Court issue a preliminary injunction prohibiting the implementation of this approved redistricting map (Docket #1275) from taking effect until further order of this Honorable Court.

COUNT II – VIOLATION OF THE VOTING RIGHTS ACT

155. Paragraphs 1 through 154 of this Complaint are hereby incorporated by reference.

156. Section 2 of the Voting Rights Act of 1965 prohibits voting practices or procedures that discriminate on the basis of race, color, or membership in a language minority group.

157. As discussed hereinabove, the Boston City Council discriminated against residents based solely on their race in an effort to achieve their stated goal of "racial balancing".

158. There was no violation of the Voting Rights Act in any of the affected Districts that would necessitate the aggressive redistricting of boundaries along racial lines.

159. Moreover, as is evident from the attachments to this Complaint, many minority residents and language minority residents were shut out from the deliberative and legislative process due to a failure of the City Council to provide access.

160. The City Council deliberately diluted the white vote in District 3, while also diluting the African-American vote in District 4 for no valid reason other than their stated purpose of "racial balancing".

161. Under the existing plan before redistricting, District 3 had a long history of electing African –American officials, and District 4 had a long history of electing white officials.

162. There was no racial polarization of voting blocs in either district that would require redistricting based on race.

163. Also, the City Council failed to take into account the various different minority groups in the affected districts, instead seeing them as a duopoly of monolithic groups of whites and non-whites.

164. In pursuing their stated goal of racial balancing, the City Council has diluted the voting power of African-Americans in District 4, of whites in District 3, and of various other minority groups whose tight-knit communities have been severed across multiple districts, damaging their collective power to effect meaningful change at the ballot box.

165. The redistricting legislation approved by the City Council violates Section 2 of the Voting Rights Act and Plaintiffs respectfully request that his Honorable Court issue an order vitiating said legislation.

COUNT III – VIOLATION OF THE FOURTEENTH AMENDMENT

166. Paragraphs 1 through 165 of this Complaint are hereby incorporated by reference.

167. The Fourteenth Amendment to the United States Constitution provides, in pertinent part that "No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws."

168. The Equal Protection Clause prohibits a state, "without sufficient justification, from 'separat[ing] its citizens into different voting districts on the basis of race.'"Bethune-Hill v. Va. State Bd. of Elections, 137 S. Ct. 788, 797 (2017)

169. Race-based lines, therefore, are unconstitutional where (1) "race was the predominant factor motivating the legislature's decision to place a significant number of voters within or without a particular district,"and (2) the district's design cannot withstand strict scrutiny. Miller v. Johnson, 515 U.S. 900, 916 (1995).

170. To pass strict scrutiny, the state must prove that its race-based redistricting scheme is "narrowly tailored" to meet a "compelling interest." Bethune-Hill, 137 S. Ct. at 801.

171. As discussed hereinabove, the primary (if not the only) goal of the City Council was to engage in "racial balancing" of various districts.

172. There was no compelling interest that would excuse the naked racial animus behind the City Council's plan, and certainly there was no narrow tailoring to achieve such compelling interest that would survive strict scrutiny.

173. There is no evidence in the record of racial polarization of votes in the City of Boston or in the affected districts.

174. There have been no Voting Rights Act violations (as confirmed by Professor Wice).

175. The Districts most affected by the redistricting legislation each have long histories of race-neutral elections, with white candidates winning elections in majority minority districts and minority candidates winning in majority white districts and precincts.

176. Because the redistricting legislation does not meet a compelling interest, and because the legislation is not narrowly tailored to that compelling interest, Plaintiffs respectfully request that this Honorable Court issue an order finding said legislation unconstitutional.

WHEREFORE, the Plaintiffs respectfully requests this Honorable Court:

1. Issue a preliminary injunction preventing the Defendant, the Boston City Council, from enacting the Redistricting Plan (Docket #1275) approved by the Boston City Council on November 2, 2022;
2. Enter an order finding that the Redistricting Plan (Docket #1275) approved by the Boston City Council on November 2, 2022 violates Section 2 of the Voting Rights Act;
3. Enter an order finding that the Redistricting Plan (Docket #1275) approved by the Boston City Council on November 2, 2022 violates the Fourteenth Amendment to the United States Constitution; and
4. Grant all other relief which the Court may deem just and proper.

Respectfully submitted,
The Plaintiffs,
By their Attorneys,

/s/ Paul Gannon
Paul Gannon, Esquire
Law Office of Paul Gannon, P.C.
546 E. Broadway
South Boston, MA 02127
(617) 269-1993
BBO# 548865
pgannon@paulgannonlaw.com

/s/ Glen Hannington
Glen Hannington, Esq.
LAW OFFICES OF GLEN HANNINGTON

Ten Post Office Square, 8th Floor South
Boston, MA 02109
TEL#: (617) 725-2828
BBO#: 635925
glenhannington@aol.com

Dated: November 21, 2022

EXHIBIT A

Order of Councilor Liz Breadon

CITY OF BOSTON
IN CITY COUNCIL

ORDER FOR THE ADOPTION OF CITY COUNCIL REDISTRICTING PRINCIPLES

WHEREAS, At the 1981 municipal election, residents of the City of Boston voted 41,973 to 34,623 in favor of a binding referendum changing the structure of the Boston City Council from being elected entirely at-large to adding district representation; *and*

WHEREAS, The Massachusetts Legislature enacted chapter 605 of the Acts of 1982, providing for the election of a City Council consisting of nine members elected from equally populous districts and four members elected at-large, specifying the process by which the final City Council to be elected entirely at-large was to draw the inaugural district lines; *and*

WHEREAS, Boston's first electoral district map passed by the City Council, 7 to 2, and approved by the Mayor (chapter 6 of the Ordinances of 1982) was challenged by a lawsuit from a coalition of the Latino Political Action Committee, Caucus Latino de Poliza Social de Massachusetts, Inc., the Black Political Task Force, and the Boston Peoples Organization; *and*

WHEREAS, Drawn on the basis of the 1975 state census, the districts were invalidated in *Latino Political Action v. City of Boston*, 568 F. Supp. 1012 (D. Mass. 1983) when 1980 federal census data revealed a constitutionally impermissible population variance of 23.6 percent violating the "one person, one vote" standard, a ruling upheld on appeal, 716 F.2d 68 (1st Cir. 1983); *and*

WHEREAS, U.S. Supreme Court Justice William J. Brennan, Jr. in August 1983 ruled that the delay caused by having to redraw districts for the November 1983 municipal election did not warrant approval of the Massachusetts Attorney General's application for stay, *Bellotti v. Latino Political Action*, 463 U.S. 1319 (1983), prompting passage of a home rule petition for Boston's one-time emergency election procedures in chapter 357 of the Acts of 1983; *and*

WHEREAS, A second map that unanimously passed the Council with Mayoral approval (chapter 25 of the Ordinances of 1983) was again challenged by the coalition, with the addition of the Asian Political Caucus, alleging unlawful dilution of minority voting power and infringing on the rights of minority candidates; however, the Court ruled that the Council was absolutely immune from suit in exercising their legislative duties, *Latino Political Action v. City of Boston*, 581 F. Supp. 478 (D. Mass. 1984) and the map was later upheld 609 F. Supp. 739 (D. Mass. 1985) and affirmed, 784 F.2d 409 (1st Cir. 1986); *and*

WHEREAS, The City Council again redrew electoral districts in 1987, 1993, and 2002 amid the backdrop of further redistricting litigation for equal representation of Boston's Black voters at the state and federal levels, *Black Political Task Force v. Connolly*, 679 F. Supp. 109 (D. Mass. 1988), *Black Political Task Force v. Connolly*, F. Supp. Civ., Nos. 91-12750-H, 91-12751-H (D. Mass. 1992), *Black Political Task Force v. Galvin*, 300 F. Supp. 2d 291 (D. Mass. 2004); *and*

WHEREAS, Historic context led the Massachusetts Legislature's Special Joint Committee on Redistricting and the Boston City Council's Committee on Census and Redistricting to facilitate 2011-2012 redistricting processes by intentionally prioritizing meaningful engagement of residents from marginalized communities and neighborhoods historically split across district lines, with ample time to scrutinize proposals at dozens of public hearings and committee meetings spanning more than one year, and, despite these efforts, the Mayor twice disapproved the Council's maps due to inequitable racial imbalance; *NOW, THEREFORE BE IT*

ORDERED: That the Boston City Council adopt the following principles to guide and inform procedures led by its Committee on Redistricting for crafting legally defensible City Council electoral districts for the City of Boston, pursuant to chapter 605 of the Acts of 1982, as amended by chapter 343 of the Acts of 1986:

2022 Redistricting Principles (*Draft – August 31, 2022*)

I. *Conduct.* Councilors will adhere to Rule 38 of the City Council Rules relative to conduct during debate and deliberation, and refer to present or proposed electoral districts by the assigned district number or neighborhood name(s), refraining from using the name of any incumbent City Councilor;

II. *Public Participation*. To enhance and expand civic participation while strengthening public confidence in elections and governance, transparency in redistricting is essential. Deliberation among Councilors as decision-makers, or with legal and mapping consultants, must remain restricted to public Committee hearings, working sessions, and meetings duly noticed pursuant to the Open Meeting Law, with opportunities for the public to provide testimony, where appropriate. Ample outreach to communities and access to redistricting tools to allow meaningful participation is also essential.

III. *Legal Standards.* To craft a legally defensible redistricting plan, Councilors must consider pertinent constitutional and statutory provisions, such as the Voting Rights Act and City Charter provisions, as well as redistricting case law, including those involving the City of Boston;

IV. *Use of Existing Precincts.* Notwithstanding any imperfections of geographic boundaries due to decadeslong deferral of citywide reprecincting, proposed electoral districts must be composed of existing precincts, as most recently adopted by the Board of Election Commissioners;

V. *Guidelines*. Proposed maps should be drawn to ensure population equality and avoidance of excessive deviation, have compact and contiguous boundaries, avoid over-concentration of protected groups, preserve communities of interest, provide voters of protected groups opportunities to achieve proportionality by electing their candidates of choice, and prohibit favoring of incumbent residency.

VI. *Presentation of Proposals.* Submissions of nine (9) proposed districts should consist of the following:

A. Written descriptions in the form of an ordinance listing wards and precincts;

B. A corresponding map illustrating proposed districts, produced using Esri Redistricting software in coordination with City Council Central Staff and City of Boston GIS staff;

C. Corresponding tables presenting the following demographic statistics for each district:

1. Total population deviation by district *and* the plan's overall deviation range;
2. Total population disaggregated by race, *and* each racial group's population as a percentage of each district's total population;
3. Aggregate racial minority (total non-White) population, *and* minority population as a percentage of each district's total population;
4. Total Voting Age Population (VAP), or Citizen Voting Age Population (CVAP), disaggregated by race, *and* each racial group's VAP or CVAP as a percentage of each district's total VAP or CVAP, for purposes of evaluating potential voter strength;

D. If possible, present total population change from 2010 to 2020 Census, *and* future population projections based on generally accepted statistical methods; and

E. If possible, present total housing unit change from 2010 to 2020 Census, *and* future housing unit estimates based on approved and permitted residential unit development pipeline; and

VII. *Deadline for Action*. Electoral districts must be drawn with approval of the Mayor by no later than November 7, 2022. Councilors may file proposed ordinances for the City Council meetings of September 14, September 21, September 28, or October 5, aiming for passage by October 19, and, in the event of disapproval, leave October 26 and/or November 2 for revision.

In City Council: August 31, 2022

EXHIBIT B

Amended Docket #1098

Order of Councilor Liz Breadon

CITY OF BOSTON
IN CITY COUNCIL

ORDER FOR THE ADOPTION OF CITY COUNCIL REDISTRICTING PRINCIPLES

WHEREAS, At the 1981 municipal election, residents of the City of Boston voted 41,973 to 34,623 in favor of a binding referendum changing the structure of the Boston City Council from being elected entirely at-large to adding district representation; *and*

WHEREAS, The Massachusetts Legislature enacted chapter 605 of the Acts of 1982, providing for the election of a City Council consisting of nine members elected from equally populous districts and four members elected at-large, specifying the process by which the final City Council to be elected entirely at-large was to draw the inaugural district lines; *and*

WHEREAS, Boston's first electoral district map passed by the City Council, 7 to 2, and approved by the Mayor (chapter 6 of the Ordinances of 1982) was challenged by a lawsuit from a coalition of the Latino Political Action Committee, Caucus Latino de Poliza Social de Massachusetts, Inc., the Black Political Task Force, and the Boston Peoples Organization; *and*

WHEREAS, Drawn on the basis of the 1975 state census, the districts were invalidated in *Latino Political Action v. City of Boston*, 568 F. Supp. 1012 (D. Mass. 1983) when 1980 federal census data revealed a constitutionally impermissible population variance of 23.6 percent violating the "one person, one vote" standard, a ruling upheld on appeal, 716 F.2d 68 (1st Cir. 1983); *and*

WHEREAS, U.S. Supreme Court Justice William J. Brennan, Jr. in August 1983 ruled that the delay caused by having to redraw districts for the November 1983 municipal election did not warrant approval of the Massachusetts Attorney General's application for stay, *Bellotti v. Latino Political Action*, 463 U.S. 1319 (1983), prompting passage of a home rule petition for Boston's one-time emergency election procedures in chapter 357 of the Acts of 1983; *and*

WHEREAS, A second map that unanimously passed the Council with Mayoral approval (chapter 25 of the Ordinances of 1983) was again challenged by the coalition, with the addition of the Asian Political Caucus, alleging unlawful dilution of minority voting power and infringing on the rights of minority candidates; however, the Court ruled that the Council was absolutely immune from suit in exercising their legislative duties, *Latino Political Action v. City of Boston*, 581 F. Supp. 478 (D. Mass. 1984) and the map was later upheld 609 F. Supp. 739 (D. Mass. 1985) and affirmed, 784 F.2d 409 (1st Cir. 1986); *and*

WHEREAS, The City Council again redrew electoral districts in 1987, 1993, and 2002 amid the backdrop of further redistricting litigation for equal representation of Boston's Black voters at the state and federal levels, *Black Political Task Force v. Connolly*, 679 F. Supp. 109 (D. Mass. 1988), *Black Political Task Force v. Connolly*, F. Supp. Civ., Nos. 91-12750-H, 91-12751-H (D. Mass. 1992), *Black Political Task Force v. Galvin*, 300 F. Supp. 2d 291 (D. Mass. 2004); *and*

WHEREAS, Historic context led the Massachusetts Legislature's Special Joint Committee on Redistricting and the Boston City Council's Committee on Census and Redistricting to facilitate 2011-2012 redistricting processes by intentionally prioritizing meaningful engagement of residents from marginalized communities and neighborhoods historically split across district lines, with ample time to scrutinize proposals at dozens of public hearings and committee meetings spanning more than one year, and, despite these efforts, the Mayor twice disapproved the Council's maps due to inequitable racial imbalance; *NOW, THEREFORE BE IT*

Amended Docket #1098

ORDERED: That the Boston City Council adopt the following principles to guide and inform procedures led by its Committee on Redistricting for crafting legally defensible City Council electoral districts for the City of Boston, pursuant to chapter 605 of the Acts of 1982, as amended by chapter 343 of the Acts of 1986:

2022 Redistricting Principles

I. *Decorum.* Councilors will adhere to Rule 38 of the City Council Rules relative to conduct during debate and deliberation, and refer to present or proposed districts by the assigned district number or neighborhood name(s), refraining from using the name of any incumbent City Councilor;

II. *Public Participation*. To enhance and expand civic participation while strengthening public confidence in elections and governance, transparency in redistricting is essential. Deliberation among Councilors as decision-makers, or with legal and mapping consultants, must remain restricted to public Committee hearings, working sessions, and meetings duly noticed pursuant to the Open Meeting Law, with opportunities for the public to provide testimony, where appropriate. The Committee will livestream and record redistricting working sessions. Ample outreach to communities and access to redistricting tools to allow meaningful participation is also essential.

III. *Legal Review.* Prior to presentation before the Council for adoption, a proposed redistricting plan should be reviewed by outside counsel to ensure compliance under the Voting Rights Act of 1965 to prohibit the denial of equal access to the political process on account of race, color, or membership in a language minority group;

IV. *Consideration of Proposals.* Review of proposed redistricting plans should:

A. Ensure the proposed ordinance properly allocates all 275 voting precincts of the City;

B. Present data for each of the six tables in the 2020 Census Redistricting Data (Public Law 94-171) Summary File;

C. Be compared to 2020 Census data for the “baseline” districts reconciling split precincts, as discussed at the Committee on Redistricting working session on September 20, 2022;

D. Be compared to 2010 Census data for the “baseline” districts reconciling split precincts, as discussed at the Committee on Redistricting working session on September 20, 2022.

In City Council: September 28, 2022

EXHIBIT C

OFFERED BY COUNCILORS RICARDO ARROYO, TANIA FERNANDES ANDERSON, LARA AND MEJIA

CITY OF BOSTON
IN CITY COUNCIL

AN ORDINANCE AMENDING CITY COUNCIL ELECTORAL DISTRICTS

Be it ordained by the City Council of Boston, as follows:

City of Boston Code, Ordinances, Chapter Two be amended by striking 2-9.2 in its entirety and replacing it with the following new language:

The districts redrawn under the authority of Chapter 605 of the Acts of 1982 as amended by Chapter 343 of the Actions of 1986 are hereby redrawn, as follows:

District One - Consisting of precincts numbered one through fourteen of Ward One; precincts one through eight of Ward Two; precincts numbered one through four and ten and eleven of Ward Three.

District Two - Consisting of precincts numbered six through eight and twelve through sixteen in Ward Three; precincts numbered one and thirteen in Ward Five; precincts numbered one through twelve in Ward Six; and precincts numbered one through seven in Ward Seven.

District Three - Consisting of precincts numbered one through five in Ward Four; precinct numbered fourteen in Ward Five; precincts numbered eight and nine in Ward Seven; precincts numbered one, two, and six in Ward Eight; precincts numbered one and two in Ward Nine; precincts numbered three, and six through ten in Ward Thirteen; precincts numbered three, four, six, eight, and nine in Ward Fifteen; and precincts numbered one, two, four through ten, and twelve in Ward Sixteen.

District Four - Consisting of precincts numbered one through seven and nine through thirteen in Ward Fourteen; precincts numbered two, five, and seven in Ward Fifteen; precincts numbered three and eleven in Ward Sixteen; precincts numbered one through fourteen in Ward Seventeen; and precincts numbered one and two in Ward Eighteen.

District Five - Consisting of precincts numbered eight and fourteen in Ward Fourteen; precincts numbered three through twenty-three in Ward Eighteen; precincts numbered ten through thirteen in Ward Nineteen; and precincts numbered one, two, four, and nine in Ward Twenty.

District Six - Consisting of precincts numbered six through nine in Ward Ten; precincts numbered four through ten in Ward Eleven; precincts numbered one through nine in Ward

Nineteen; precincts numbered three, five through eight, and ten through twenty-one in Ward Twenty.

District Seven - Consisting of precincts numbered eight, nine, and eleven in Ward Four; precinct numbered ten in Ward Seven; precincts numbered three through five in Ward Eight; precincts numbered three through seven in Ward Nine; precincts numbered one through three in Ward Eleven; precincts numbered one through nine in Ward Twelve; precincts numbered one, two, four, and five in Ward Thirteen; and precinct numbered one in Ward Fifteen.

District Eight - Consisting of precincts numbered five, nine, and seventeen in Ward Three; precincts numbered six, seven, ten, and twelve in Ward Four; precincts numbered two through twelve, and fifteen in Ward Five; precincts numbered one through five in Ward Ten; and precincts numbered one and two in Ward Twenty-One.

District Nine - Consisting of precincts numbered three through sixteen in Ward Twenty-One; and precincts numbered one through thirteen in Ward Twenty-Two.

Filed in City Council: September 23, 2022

Proposed Redistricting Plan submitted by Councilors Arroyo and Fernandes Anderson (Docket #1186)

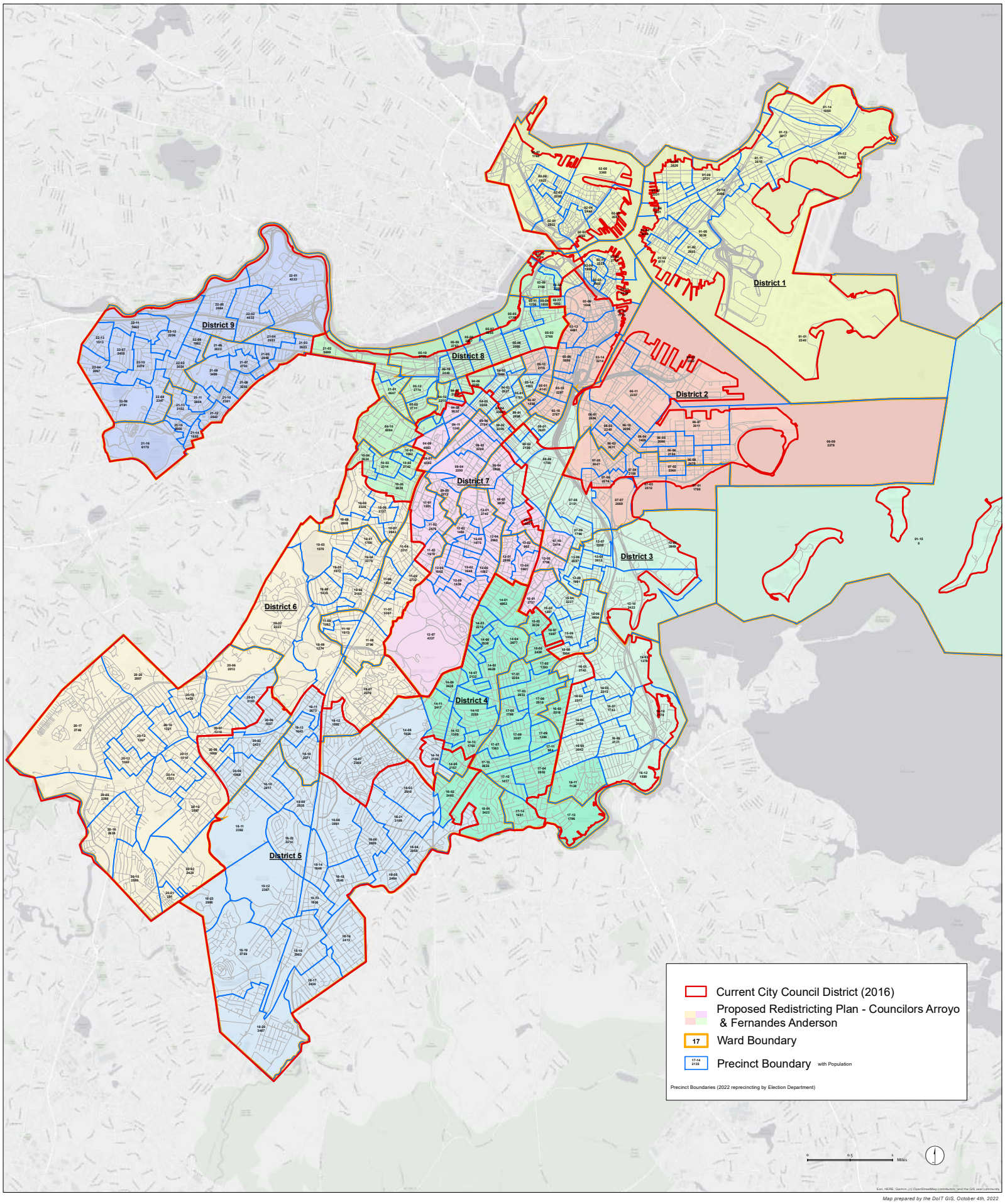


EXHIBIT D

Proposed Redistricting Plan submitted by Councilor Murphy (Docket #1215)

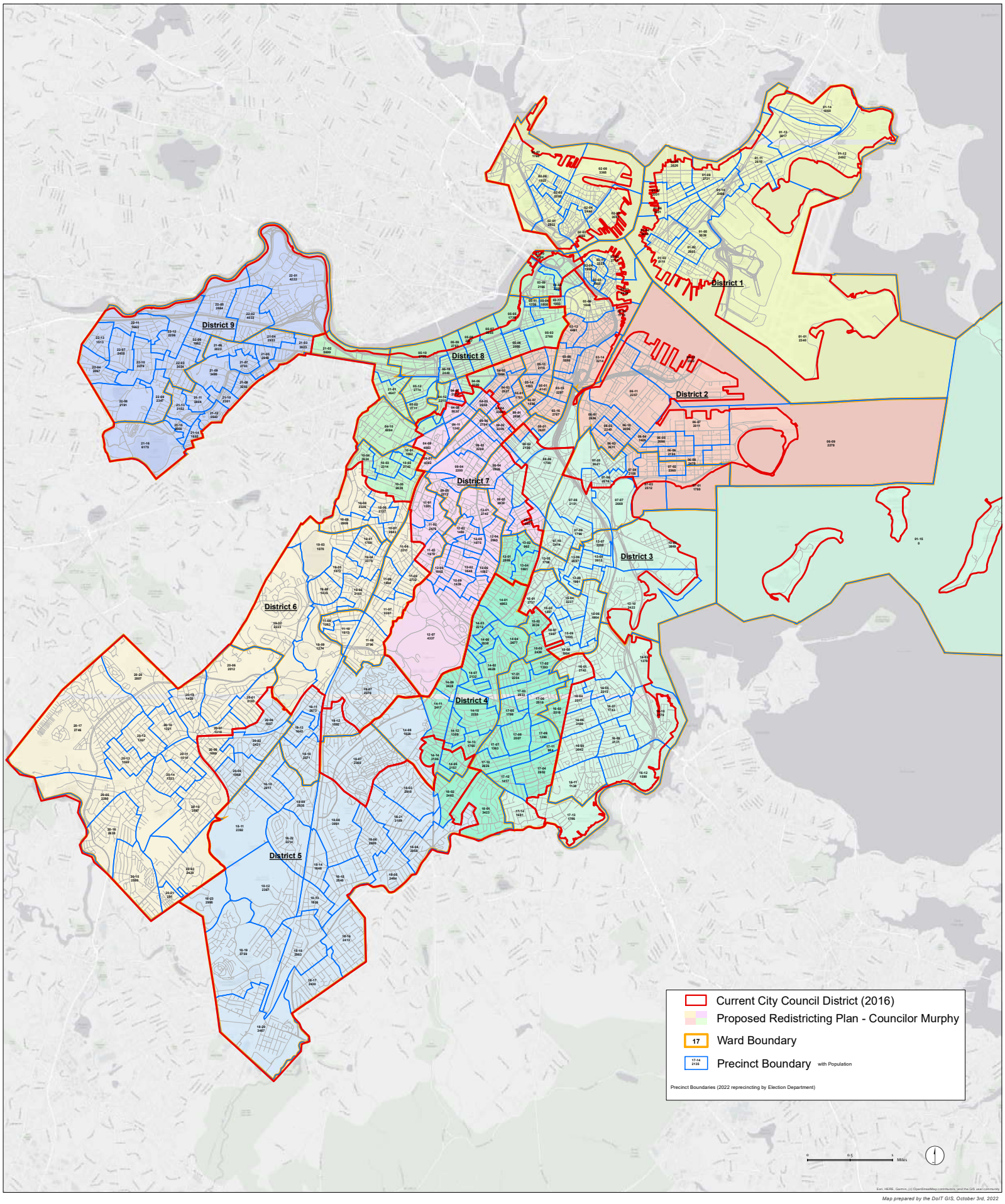


EXHIBIT E

City Council Committee on Redistricting proposed plan submitted by Chair Councilor Breadon and Vice Chair Councilor Worrell (Docket #1216)

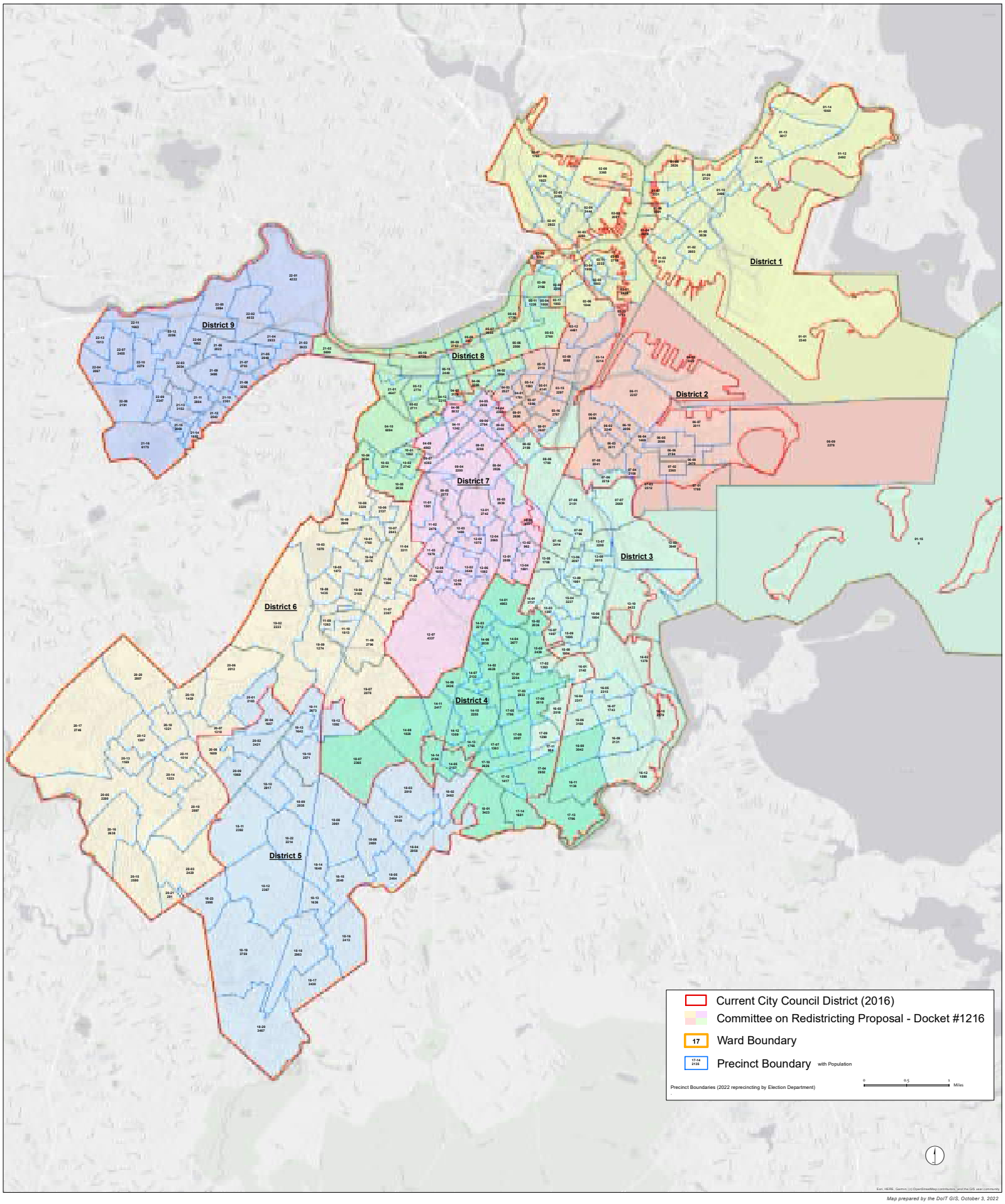


EXHIBIT F

CDVN MASS
to liz.breadon, Ed, brian.worrell@boston.gov, +10
7 minutes ago Details

Dear President Flynn, Chair Breadon, Vice Chair Worrell, members of the Committee and members of the Council,

I write to you to request that the Boston City Council refrain from voting on the matter of Redistricting until you have a hearing in the Vietnamese language.
As you know the Vietnamese community in Dorchester stands to be impacted like all immigrant communities by the Redistricting legislation.
Despite this, the Council has not provided the typical language access that is provided for meetings of even lesser consequence.

Last year to accommodate those who speak English as a second language including many of our elderly residents, Redistricting hearings were held in Vietnamese, Cantonese, Mandarin, Haitian Creole, Cape Verdean Creole, Spanish, Portuguese and Khmer.
Therefore, we, the Vietnamese Community of Massachusetts, are calling on the Boston City Council to hold hearings in Vietnamese and the aforementioned languages so that our immigrant communities can be informed and understand how the decisions of their City Councilors are being made and how it will affect them.

Sincerely,

Khang Nguyen

--
Executive Board
President: Vinnie Than
Vice President of Internal Affairs: Khang Nguyen
Vice President of External Affairs: Nhu Le
Secretary Chief : Daniel Lam
Treasurer: Nhi Le
Media Chair: Daniel Lam
Event Chair: Oanh Lac
Youth and Student Activities Chair: Thuy-Lieu Vu

EXHIBIT G

Sarepta Women and Children Empowerment Center, Inc
100 Morrissey Boulevard | Boston, MA 02125 |
P: 857-991-6198 | sareptawcec@gmail.com

November 7th, 2022

Request to Veto the Boston Redistricting Process

Honorable Mayor Michelle Wu,

I am writing to request that you veto the Boston Redistricting Process and request that the newly proposed redistricting maps be redrawn. The current maps presented as part of this process will divide the Haitian community of Mattapan and will disenfranchise Haitian voters making it virtually impossible for them to elect someone to best represent their cultural and political values.

There are many strengths to this great city of ours among which is its cultural fabric and ethnic representation. We have the Latin Quarter, Little Saigon, North End ("Little Italy"), South End (Irish Enclave), China Town, and others; all of these communities collectively contribute to the rich fabric that is this great City of Boston. For over forty (40) years parts of the Dorchester, Hyde Park and Mattapan neighborhoods has been synonymous with a strong Haitian Creole vein resulting in ceiling-breaking first political achievements. These newly proposed municipal district maps stand to eviscerate all political gains and future opportunities for this community.

As an administration that prides itself in honoring and uplifting the cultural vibrancy of this city, endorsing the proposed maps on your part will compromise the integrity of ethnic black neighborhoods, weakening their political strength. This is illegal and in direct violation of the city charter and in actuality violates voting rights legislation. According to Section 18, district boundaries: "respective district lines shall be the same for the city council and the school committee. Each such district shall be compact and shall contain, as nearly as may be, an equal number of inhabitants as determined by the most recent state decennial census, shall be composed of contiguous existing precincts, and shall be drawn with a view toward preserving the integrity of existing neighborhoods."

This process will impact the Haitian community of Mattapan and be deeply affected by the outcome of this legislation for the next 10-20 years. It is for this reason that we ask that you, Honorable Mayor Michelle Wu, veto this process and conduct hearings that accommodate to the languages of communities of interests that have been illegally left out of this process. This is a

critical decision for our community as the stakes on the ramifications and implications of this legislation are too great. Equity matters and so does the equity of geographies and communities.

Respectfully,

James Eliscar
Director of Operations
Sarepta Women and Children Empowerment Center, Inc
100 Morrissey Boulevard
Boston, MA 02125
W : 617-287-7138
C: 857-991-6198
sareptawcec@gmail.com

EXHIBIT H

----- Forwarded Message -----
From: Carol Sullivan <carolsullivan1129@yahoo.com>
To: mayor@boston.gov <mayor@boston.gov>
Cc: Anna White <anna.white@boston.gov>
Sent: Tuesday, November 8, 2022 at 06:18:48 AM EST
Subject: Redistricting Legislation Email From The Community

Dear Mayor Wu,

The residents of the Mary-Ellen McCormack Community in South Boston respectfully request that Mayor Wu veto the City Council's Redistricting legislation that would divide public
housing tenants in South Boston. We also ask that you send it back with an amendment to unite Boston's neighborhoods including South Boston's public housing developments
into District 2 where they had historically been. Dividing our communities is a violation of our voting rights and cannot stand to pass.

Also please request that the City hold hearings with language access so that our many residents who speak English as a second language have ample opportunity to understand
how these plans that will be in place for decades and will impact our community.

Sincerely,

Carol Sullivan

Thank you,

Carol Sullivan
Executive Director
Mary Ellen McCormack Task Force, Inc.
345 Old Colony Avenue
South Boston, MA 02127

EXHIBIT I

SOUTH BOSTON EN ACCION

Office: 1244 Columbia Road Suite. 797, Boston, MA 02127

Mail: 10 Logan Way, Basement Suite 1, Boston, MA 02127

Rec Space: 10 Logan Way, Basement Suite 1, Boston, MA 02127

November 1st, 2022

Dear Councilor Liz Breadon,

My name is Mercy Robinson, and I am the executive director of South Boston En Accion. Over the past few weeks, I have been working extensively to ensure that the Spanish-speaking residents of Mary Ellen McCormick, Old Colony, and the West Broadway Developments' questions, concerns, and frustrations are addressed. At the last several meetings that I have participated in person and on zoom, language access has not been a priority. When attempts were made to translate for residents, the interpretations were disrupted. I want to request a redistricting hearing in Spanish formally. We must ensure that everyone has the opportunity to learn about the impacts of redistricting. With elections around the corner, many of our residents don't know what is occurring and are confused about their next steps. Again, I'm afraid I must disagree with the political splitting of the developments. Our community is made up of the most vulnerable residents, and dividing us will create more chaos and harm. Our residents are not satisfied, and there must be better solutions to our population crisis within the districts that do not put our low- and moderate-income communities on the chopping block.

Sincerely,

Mercy Robinson
Executive Director
South Boston En Accion

EXHIBIT J

4

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

SUPERIOR COURT DEPARMTENT
CIVIL ACTION NUMBER:

22-2490H

ROBERT O'SHEA, CHAIRMAN OF THE WARD 6 DEMOCRATIC COMMITTEE, ET AL,
Plaintiffs

v.

THE BOSTON CITY COUNCIL
Defendant

SUFFOLK SUPERIOR COURT
CIVIL CLERK'S OFFICE
2022 NOV -2 A 11:17
MICHAEL JOSEPH DONOVAN
CLERK / MAGISTRATE

AFFIDAVIT OF ROBERT O'SHEA

Now comes Robert O'Shea, Chairman of the Boston Ward 6 Democratic Committee and South Boston resident based on personal knowledge do hereby state and affirm that:

1. I am the Chairman of the Boston Ward 6 Democratic Committee in South Boston, Massachusetts.

2. I am a resident of South Boston, Massachusetts.

3. On Oct 10, 2022, four (4) members of the Boston City Council Redistricting Committee and seven (7) members of the Boston City Council met at the Bruce C. Bolling Municipal Building to discuss the topic of Legislative Redistricting in the City of Boston without giving notice pursuant to the Open Meeting Law, Chapter 30A of the Massachusetts General Law.

4. On Oct. 18, 2022, four (4) members of the Boston City Council Redistricting Committee and five (5) members of the Boston City Council were present at City Hall Plaza to meet and discuss the topic of Legislative Redistricting in the City of Boston without giving notice pursuant to the Open Meeting Law, Chapter 30A of the Massachusetts General Law.

5. On Oct. 19, 2022, four (4) members of the Boston City Council Redistricting Committee and seven (7) members of the Boston City Council met at the Condon School in South Boston, MA to discuss the topic of Legislative Redistricting in the City of Boston without giving notice pursuant to the Open Meeting Law, Chapter 30A of the Massachusetts General Law.

6. The Open Meeting Law Complaint, a copy of which is attached hereto, was served on both the Clerk of the Boston City Council and the Boston City Council President on October 25, 2022.

7. On October 26, 2022, the Boston City Council met for its regularly scheduled meeting.

8. Due to the Open Meeting Law Complaint noted above, the Boston City Council withdrew its anticipated vote on any proposed Redistricting Maps.

9. Although there was mention of the October 25, 2022 filed Open Meeting Law Violations, the Boston City Council neither reviewed any of the alleged violations nor did they review all the proposed remedies listed therein.

10. The Boston City Council members only mentioned that they were waiting for their legal counsel to respond to the Complaint.

11. As of this date, the Boston City Council hasn't responded in writing to the Open Meeting Law Complaint filed on October 25, 2022.

12. It's anticipated that other residents of the City of Boston will file new Open Meeting Law Complaints prior to the November 2, 2022 scheduled meeting of the Boston City Council.

13. The Attorney General's Office is in possession of the Open Meeting Law Complaint; they will not address the issue until on or after November 24, 2022.

14. The Boston City Council has indicated that they would be voting on a Redistricting Map at their next scheduled meeting on Wednesday, November 2, 2022.

15. Although the Boston City Council has not responded to the Open Meeting Law Complaint, (Exhibit "A"), the Boston City Council has indicated that they plan to vote on a Redistricting Map at their next scheduled meeting on Wednesday, November 2, 2022.

16. Should the Boston City Council take a vote on the proposed Redistricting Map prior to responding to the Open Meeting Law Complaint, and prior to the Attorney General's Office response to that Complaint, (which is not required until November 24, 2022), the Plaintiffs will be irreparably harmed, as the remedies pursuant to M.G.L.c. 30A section 23(c) and 23(f) will be insufficient to remedy the Plaintiffs claims arising out of the deliberations of the elected officials which took place in violation of the Open Meeting Law in advance of any such vote.

17. The Defendant will not be prejudiced in any way from a delay in the vote as the City is under no express statutory deadline to take a vote on this issue at this time, or prior to November 2nd.

Signed under the pain and penalties of perjury on this 2nd day November 2022.

Robert O'Shea

OPEN MEETING LAW COMPLAINT FORM

Office of the Attorney General
One Ashburton Place
Boston, MA 02108

Please note that all fields are required unless otherwise noted.

Your Contact Information:

First Name: Paul Last Name: Gannon, Esq.

Address: 546 East Broadway

City: South Boston State: MA Zip Code: 02127

Phone Number: +1 (617) 269-1993 Ext.

Email: pgannon@paulgannonlaw.com

Organization or Media Affiliation (if any): 1. Boston Ward 6 Democratic Committee (see attached for add'l names)

Are you filing the complaint in your capacity as an individual, representative of an organization, or media?
(For statistical purposes only)

☐ Individual ☒ Organization ☐ Media

Public Body that is the subject of this complaint:

☒ City/Town ☐ County ☐ Regional/District ☐ State

Name of Public Body (including city/town, county or region, if applicable): Boston City Council and Boston City Council Committee on Redistricting

Specific person(s), if any, you allege committed the violation: Councilor Elizabeth Breadon (see attached for add'l names)

Date of alleged violation: (see attached)

Organization or Media Affiliation (Continued from pg. 1)

2. South Boston Citizens Association;
3. Martin F. McDonough American Legion Post;
4. St. Vincent's Lower End Neighborhood Association; and
5. Old Colony Tenant Association.

Specific person(s), if any, you allege committed the violation (Continued from pg. 1):

2. Councilor Julia Mejia;
3. Councilor Brian Worrell;
4. Councilor Ruthzee Louijeune;
5. Councilor Ricardo Arroyo;
6. Councilor Erin Murphy;
7. Councilor Frank Baker;
8. Councilor Michael Flaherty;
9. Councilor Edward Flynn; and
10. Councilor Tania Fernandes Anderson.

Date of alleged violation (Continued from pg. 1):

1. October 10, 2022;
2. October 18, 2022; and
3. October 19, 2022.

Description of alleged violation:

Describe the alleged violation that this complaint is about. If you believe the alleged violation was intentional, please say so and include the reasons supporting your belief.

Note: This text field has a maximum of 3000 characters.

Oct 10, 2022 - Four (4) members of the Boston City Council Redistricting Committee and seven (7) members of the Boston City Council met at the Bruce C. Building Municipal Building to discuss the topic of Legistative Redistricting in the City of Boston without giving notice pursuant to the Open Meeting Law.

Oct. 18, 2022 - Four (4) members of the Boston City Council Redistricting Committee and five (5) members of the Boston City Council were present at City Hall Plaza to meet and discuss the topic of Legistative Redistricting in the City of Boston without giving notice pursuant to the Open Meeting Law.

Oct. 19, 2022 - Four (4) members of the Boston City Council Redistricting Committee and seven (7) members of the Boston City Council met at the Condon School in South Boston, MA to discuss the topic of Legistative Redistricting in the City of Boston without giving notice pursuant to the Open Meeting Law.

What action do you want the public body to take in response to your complaint?

Note: This text field has a maximum of 500 characters.

1. The Boston City Council Committee on redistricting shall conduct a minimum of five (5) properly noticed public hearings in neighborhoods impacted by the proposal including South Boston, Dorchester, Mattapan, South End and Roslindale neighborhoods prior to any vote on redistricting in the Boston City Council.

(See attached)

Review, sign, and submit your complaint

I. Disclosure of Your Complaint.
Public Record. Under most circumstances, your complaint, and any documents submitted with your complaint, is considered a public record and will be available to any member of the public upon request.

Publication to Website. As part of the Open Data Initiative, the AGO will publish to its website certain information regarding your complaint, including your name and the name of the public body. The AGO will not publish your contact information.

II. Consulting With a Private Attorney.
The AGO cannot give you legal advice and is not able to be your private attorney, but represents the public interest. If you have any questions concerning your individual legal rights or responsibilities you should contact a private attorney.

III. Submit Your Complaint to the Public Body.
The complaint must be filed first with the public body. If you have any questions, please contact the Division of Open Government by calling (617) 963-2540 or by email to openmeeting@state.ma.us.

By signing below, I acknowledge that I have read and understood the provisions above and certify that the information I have provided is true and correct to the best of my knowledge.

Signed: _____ **Date:** 10/25/22

For Use By Public Body
Date Received by Public Body:

For Use By AGO
Date Received by AGO:

What action do you want the public body to take in response to your complaint? (Continued from pg. 2)

2. To require the Boston City Council to vote on the criteria as outlined in the memo from Jeffrey M. Wice, Esq. who was contracted and retained by the City of Boston Corp. Counsel to promulgate criteria for the Boston City Council to utilize in redrawing City Council District maps.

3. To require the Boston City Council to vote on the Boston City Council District redistricting map for the City of Boston in accordance with the criteria noted in paragraph 2 above.

EXHIBIT K

OPEN MEETING LAW COMPLAINT FORM

Office of the Attorney General
One Ashburton Place
Boston, MA 02108

Please note that all fields are required unless otherwise noted.

Your Contact Information:

First Name: John Last Name: Lyons

Address: 80 Copeland Street

City: Quincy State: MA Zip Code: 02169

Phone Number: 617-905-2609 Ext.

Email: jjljdcpa@aol.com

Organization or Media Affiliation (if any): Attorney representing Dorchester Civic Associations

Are you filing the complaint in your capacity as an individual, representative of an organization, or media?
(For statistical purposes only)

☐ Individual ■ Organization ☐ Media

Public Body that is the subject of this complaint:

■ City/Town ☐ County ☐ Regional/District ☐ State

Name of Public Body (including city/town, county or region, if applicable): Boston City Council

Specific person(s), if any, you allege committed the violation: Boston City Councilors Ricardo Arroyo, Gabriela Coletta, Tania Fernandes Anderson, Ruthzee Louijeune, Julia Mejia,Liz Breedon,Kenzie Bok, Brian Worrell

Date of alleged violation: 9/27-10/14/22

EXHIBIT L

Proposed Redistricting Plan submitted by Councilors Breadon and Arroyo (Docket #1275)

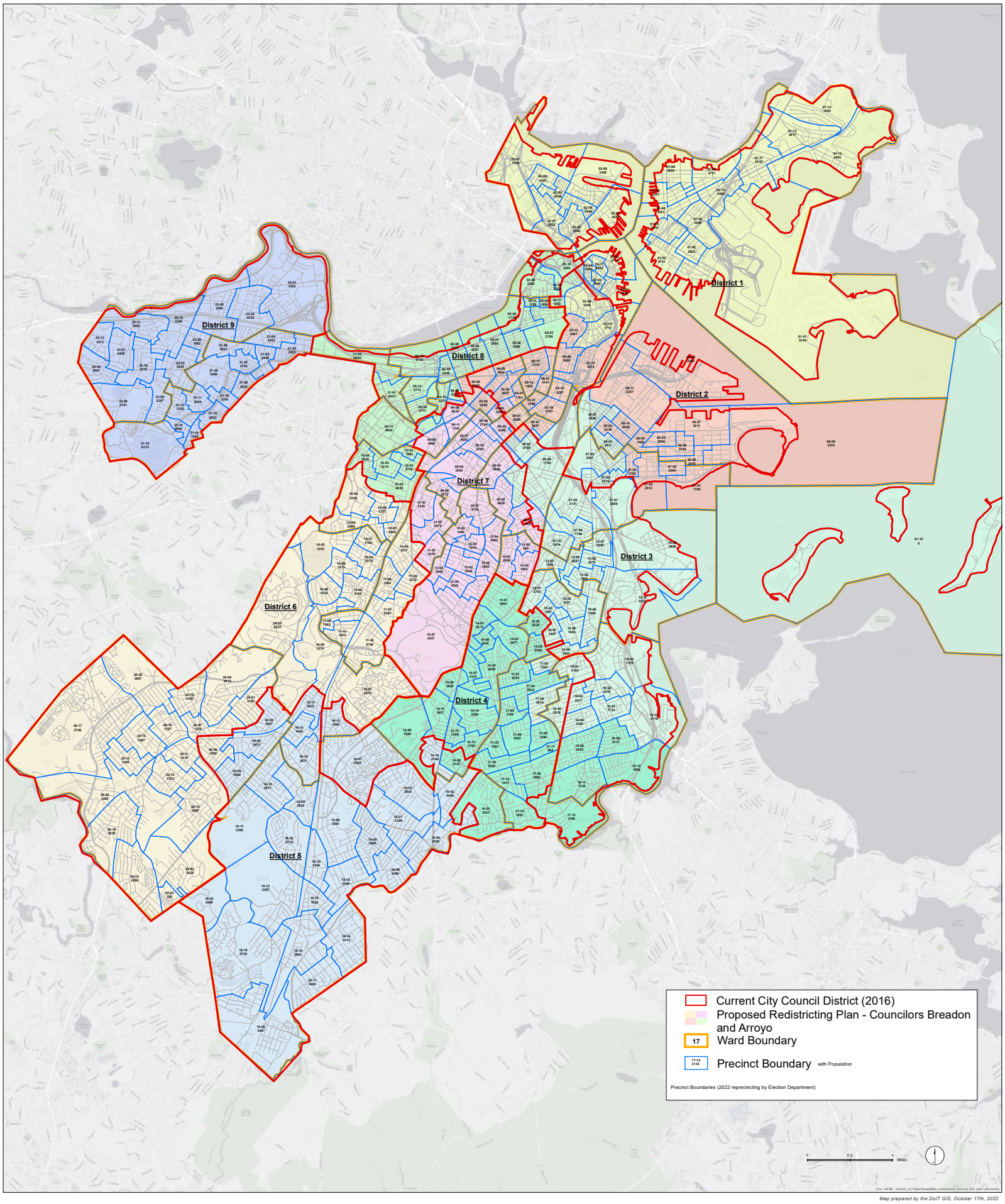
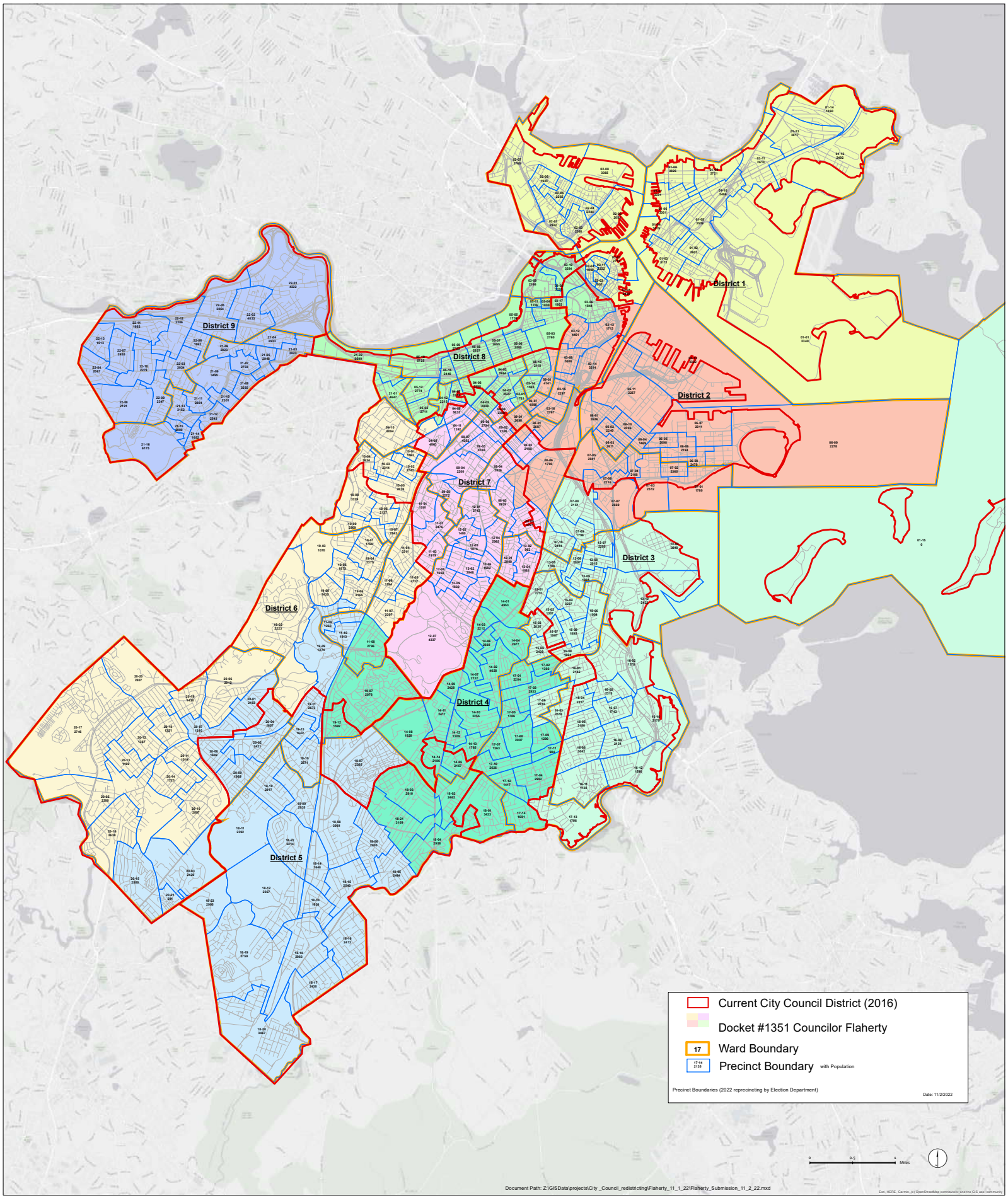


EXHIBIT M

City Council Redistricting - Docket #1351 Councilor Flaherty
November 2, 2022



OFFERED BY COUNCILOR MICHAEL FLAHERTY, BAKER, FLYNN & MURPHY

CITY OF BOSTON
IN CITY COUNCIL

AN ORDINANCE AMENDING CITY COUNCIL ELECTORAL DISTRICTS

Be it ordained by the City Council of Boston, as follows:

City of Boston Code, Ordinances, Chapter Two be amended by striking 2-9.2 in its entirety and replacing it with the following new language:

The districts redrawn under the authority of Chapter 605 of the Acts of 1982 as amended by Chapter 343 of the Actions of 1986 are hereby redrawn, as follows:

District One - Consisting of precinct numbered one through fourteen of Ward One; precincts one through eight of Ward Two; precincts numbered one through four and precinct eleven of Ward Three.

District Two - Consisting of precinct number fifteen in Ward One; precincts seven, eight, and twelve through sixteen in Ward Three; precinct numbered one in Ward Five; precincts numbered one through twelve in Ward Six; precincts numbered one through seven in Ward Seven; precincts numbered one and six in Ward Eight; and precinct number one in Ward Nine.

District Three - Consisting of precincts numbered eight through ten in Ward Seven; precincts numbered three and five through ten in Ward Thirteen; precincts numbered one through nine in Ward Fifteen; precincts numbered one through twelve in Ward Sixteen; and precincts numbered six and thirteen in Ward Seventeen.

District Four - Consisting of precinct numbered eight in Ward Eleven; precincts numbered one through fourteen in Ward Fourteen; precinct numbered one through five, seven through twelve and fourteen in Ward Seventeen; precincts numbered one through four and twenty-one in Ward Eighteen; and precincts numbered seven and twelve in Ward Nineteen.

District Five - Consisting of precincts numbered nine and ten in Ward Eleven; precincts numbered five through twenty, twenty-one and twenty-two in Ward Eighteen; precincts numbered nine, ten, eleven and thirteen in Ward Nineteen; and precincts numbered one through four, seven through nine, fifteen and twenty-one in Ward Twenty.

District Six - Consisting of precinct number ten in Ward Four; precincts numbered one through nine in Ward Ten; precincts numbered four through seven in Ward Eleven; precincts numbered one through six and eight in Ward Nineteen; precincts numbered five through six, ten through fourteen and sixteen through twenty in Ward Twenty.

District Seven - Consisting of precincts numbered four, eight, nine, and eleven in Ward Four; precincts numbered two through five in Ward Eight; precincts numbered two through seven in Ward Nine; precincts numbered one through three in Ward Eleven; precincts numbered one through nine in Ward Twelve; and precincts numbered one, two and four in Ward Thirteen.

District Eight - Consisting of precincts numbered five, six, nine, ten and seventeen in Ward Three; precincts numbered one through three and five through seven in Ward Four; precincts numbered two through fifteen in Ward Five; and precincts numbered one and two in Ward Twenty-One.

District Nine - Consisting of precincts numbered three through sixteen in Ward Twenty-One; and precincts numbered one through thirteen in Ward Twenty-Two.

Filed in Council: October 31, 2022

EXHIBIT N

Proposed Redistricting Plan submitted by Councilor Baker (Docket #1273)

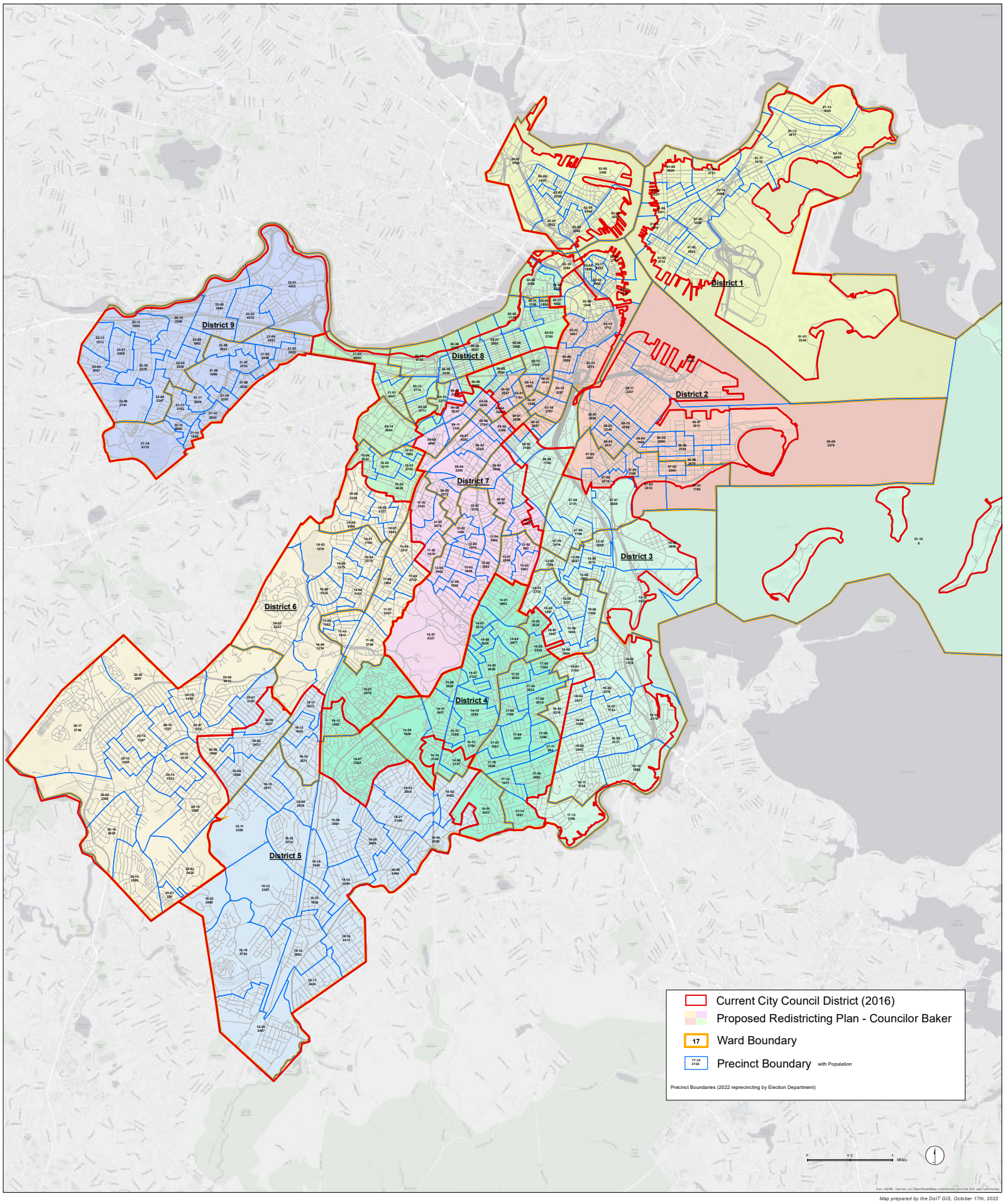


EXHIBIT O

City of Boston
Law

October 11, 2022

Councilor Liz Breadon
Chair, Committee on Redistricting
Boston City Council

Councilor Brian Worrell
Vice-Chair, Committee on Redistricting
Boston City Council

Dear Chair Breadon and Vice-Chair Worrell,

Attached hereto, please find a short memo setting forth basic principles of the criteria that the City Council should or may consider when redrawing City Council Districts. I am sharing this with the Committee on Redistricting based on a request of the Chair to have a short list of guideposts that the Committee must be cognizant of as it does its work.

This memo was prepared by Jefferey Wice, Adjunct Professor/Senior Fellow at New York Law School and a specialist in legislative districting. He is co-editor of the National Conference of State Legislatures 2020 Redistricting Handbook. Mr. Wice was identified as a resource in consultation with the Chair's office, and my office contracted with Mr. Wice to utilize his expertise in this field.

In addition to this memorandum, my office will utilize Mr. Wice's expertise to help respond to additional inquiries from the Committee or Council.

Sincerely,

Adam Cederbaum
Corporation Counsel

To:	Adam Cederbaum, Corporation Counsel, City of Boston
From:	Jeffrey M. Wice, Esq., Adjunct Professor/Senior Fellow, New York Law School
Date:	October 9, 2022
Subject:	Key Redistricting Principles for the Boston City Council

Section 18 of the Boston City Charter requires that districts "shall be compact and shall contain, as nearly as may be, an equal number of inhabitants as determined by the most recent state decennial census, shall be composed of contiguous existing precincts, and shall be drawn with a view toward preserving the integrity of existing neighborhoods. [Acts of 1982, c. 605, s. 3] Since Massachusetts no longer conducts a state decennial census, the federal decennial census provides the necessary data for the redrawing of council district boundaries.

This memorandum outlines the criteria that the City Council should consider in the redrawing of council districts.

REQUIRED CRITERIA:

1. **Population Equality:** Council districts are required to be equally substantial in population. According to U.S. Supreme Court precedents, there is a 10% limit in the population deviation from the size of the largest to smallest district. Based upon the 2020 Census, this means that the ideal district size is 75,071 residents, allowing for a + or - 5% range. Within those ranges, any deviations from 75,071 should be based upon an effort to achieve the other legitimate governmental criteria outlined below.

2. **Minority Voting Rights:** the voting rights of minority voters must be respected when developing a new map. In general, the federal Voting Rights Act of 1965 (VRA) prohibits the imposition of any voting qualification, practice, or procedure that results in the denial or abridgement of any citizen's right to vote on account of race, color, or status as a member of a language minority group. Covered language minorities include American Indians, Asian Americans, Alaskan Natives, and Spanish-heritage populations. Section 2 of the VRA specifically prohibits vote dilution when voters are dispersed ("cracked") among districts making them an ineffective voting block or if they are overly concentrated ("packed") in any one district creating an "excessive" majority.

The VRA requires the creation of an effective minority district where it can be demonstrated that the minority community (1) comprises at least 50% of an ideal, contiguous and reasonably compact district's voting age population; (2) minority voters vote cohesively for the same candidates; and (3) there is a significantly high level of racially polarized voting where the majority votes sufficiently as a bloc to prevent minority voters from electing their preferred candidates of choice.

The 14th Amendment to the U.S. Constitution prevents racial gerrymandering, prohibiting the drawing of maps that excessively segregates voters by race in a district.

It is necessary to comply with the 14th amendment and VRA requirements by avoiding discriminatory intent and a discriminatory effect of minimizing or canceling out the voting strength of members of racial or language minority groups in the voting population. Racial voting data analysis may be used to demonstrate that minority votes are not "diluted" and that race is not used as the predominant factor to draw districts (where vote dilution is not at issue). Each district must be evaluated based on local voting patterns and population data.

Compactness: districts should have a minimum distance between all parts of a district, subject to addressing other criteria. Several mathematical models have been developed to determine compactness that are used to compare competing plans.

Contiguity: all parts of a district should be connected geographically at some point with the rest of the district. In Boston, all districts must include contiguous precincts.

Preservation of Neighborhoods: Consideration must be given to drawing districts that respect the boundaries of Boston's recognized neighborhoods.

OTHER NON-REQUIRED CRITERIA:

These criteria can be considered but are not required by federal or local law:

Communities of Interest: these districts include geographical areas where residents have common demographic interests that can include socio-economic, religious, academic, business, medical, or other recognizable characteristics. Communities of interest might not follow political subdivision boundaries. Boston's City Charter prioritizes neighborhoods as required criteria, making other "communities of interest" a lesser priority in the redistricting process.

Ban on Partisanship: not favoring or disfavoring political parties, candidates, or incumbents.

Maintaining Existing District Boundaries: using current district boundaries as a determinant for making the least changes necessary.

---------- Forwarded message ---------
From: **Wice, Jeffrey** <jeffrey.wice@nyls.edu>
Date: Tue, Oct 25, 2022 at 12:53 PM
Subject: Question from Council Member Flynn re: Boston City Council Redistricting
To: Adam Cederbaum <adam.cederbaum@boston.gov>, Pilar Ortiz <pilar.ortiz@boston.gov>, Lisa Handley <lrhandley@aol.com>

Council Member Flynn sent me a direct email asking for my opinion on whether there is a VRA violation in the current district 4. Lisa responded to this question during today's meeting indicating that there was not an issue in the current district. He asked for a response by the end of the day.

Unless you would want to answer directly (since I am working for you), I can answer as follows:

Dear Councilor:

Thank you for your letter asking about whether the current Council District 4 violates the federal Voting Rights Act. To the best of my knowledge, as Dr. Handley informed the Council this morning, there is currently no risk of a Voting Rights Act violation under the current Council map enacted in 2012.

My best,
Jeff Wice

EXHIBIT P

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

SUPERIOR COURT DEPARMTENT
CIVIL ACTION NUMBER: 2284CV02490

ROBERT O'SHEA, Individually and as Chairman of the Ward 6 Democratic Committee, RITA DIXON, SHIRLEY SHILLINGFORD, MAUREEN FEENEY, PHYLLIS CORBITT, Individually and as President of the Massachusetts Union of Public Housing Tenants, THE SOUTH BOSTON CITIZENS ASSOCIATION, MARTIN F. MCDONOUGH AMERICAN LEGION POST, ST. VINCENT'S LOWER END NEIGHBORHOOD ASSOCIATION, and OLD COLONY TENANT ASSOCIATION,

Plaintiffs,

v.

THE BOSTON CITY COUNCIL,

Defendant.

AFFIDAVIT OF EDWARD FLYNN

I, Edward Flynn, under oath, do depose and say as follows:

1. My name is Edward Flynn, and I am the President of the Boston City Council and a resident of South Boston.

2. The City Council redistricting process was flawed and unfair to the most vulnerable residents of the City, particularly public housing residents, immigrants, and language minorities.

3. The City Council did not engage residents in an effective way, and failed to listen to or engage residents in public housing developments, immigrants, and language minorities.

4. Communities of color had almost no involvement in the City Council's secretive process.

5. Throughout the redistricting debate, I repeatedly informed my colleagues on the council that one of my most important goals was to ensure public housing residents were united in District 2.

6. Keeping the public housing residents united was and is an important goal because being united in one district allows public housing residents' collective voice to be heard in government.

7. In District 2, residents at the Anne Lynch Homes at Old Colony, the West 9th Apartments, and the West Broadway Development are all a short walk from each other and have much in common.

8. However, under the approved redistricting plan, these public housing developments would move from District 2 to District 3.

9. Under the previous version of the Breadon-Arroyo Map, the plan was to divide public housing developments in half, both at the Anne M. Lynch Homes (al The previous version of the Breadon-Arroyo map proposed to divide public housing developments in half - both at the Anne M. Lynch Homes (along Mercer St.) and the West Broadway Development (along Orton Marotta Way) into District 2 and District 3.

10. At that time, public housing advocates like South Boston En Accion, BHA Task Force leaders, nonprofit partners, and all civic groups in South Boston voiced complete opposition to a proposal that would divide our public housing developments from District 2, and dilute the voice of communities of color to organize and advocate for their interests.

11. The approved map still divides public housing in South Boston. The version of the map made available to the Councilors only two days before the November 2nd vote completely cut out these developments from District 2, the Council district where these developments have traditionally been located.

12. And in the last hours before the vote, West Broadway was added into District 2, still dividing public housing developments into two districts.

13. It is critical residents of color in Boston Housing Authority units are not further divided from the community of South Boston.

14. These public housing developments, managed by the Boston Housing Authority, are mostly made up of communities of color and immigrants.

15. During the pandemic, my staff and I worked closely with neighbors in District 2's public housing developments on language and communication access, senior outreach, food access, access to COVID-19 testing, providing information on vaccines, support for immigrant families, social services, youth, educational and athletic programs.

16. Placing these residents out of District 2 punishes these public housing residents and dilutes their organizing power.

17. Language and communication access are critical issues that unite residents in public housing developments.

18. In District 2, many residents in public housing speak Spanish and an increasing number also speak Cantonese.

19. Both of these languages directly unite the history and residents of District 2, with a large Cantonese speaking community in Chinatown, the South End and Bay Village.

20. The larger Spanish speaking community in the South End, such as Cathedral Public Housing and Villa Victoria, also have much in common with the public housing residents in South Boston that also speak Spanish.

21. However, the City Council, with its approved map, failed to engage these residents in the redistricting process.

22. It is unconscionable to separate these public housing developments from District 2, the Council district where these developments have traditionally been located.

23. These actions are wholly contrary to the redistricting principles that we discussed at length with experts and academics when it comes to the preservation of the core of prior districts and maintaining communities of interest.

24. Our public housing developments have a large number of Hispanic and Black residents, and they contribute greatly to the diversity of South Boston and District 2.

25. These developments have always been in District 2, and they identify with the neighborhood of South Boston.

26. Removing them completely, and separating them from the rest of South Boston, makes District 2 less diverse.

27. The Redistricting Committee ignored the requests from community groups to hold additional meetings in Cantonese, Spanish, Vietnamese, and Hatian Creole, and went ahead with a vote on November 2nd.

28. The deadline of having a map in place by November 7th was an artificial and self-imposed one.

29. According to the City of Boston Corporation Counsel, the only explicit statutory deadline set forth in the Boston City Charter is that City Council districts be redrawn by August 1, 2026.

30. Moreover, the Council did not know what the exact map was when there were plans to vote on October 26, 2022 and they still did not know the exact map until a few hours before the vote on November 2, 2022.

31. Both the public and Councilors voting on the maps had not been afforded an opportunity to view or offer feedback in a public hearing on a final map, and there were also no further meetings, hearings, or working sessions after October 25th.

32. The Council and the public did not have the opportunity to discuss the latest version of the Breadon-Arroyo map, and nobody knew what were the amendments that made it into this version that the Council was supposed to vote on.

33. Councilors also did not have the chance to have their constituents have further input.

34. District 2 and District 3 had the most stake in this redistricting process and, yet, the final map had not taken into serious consideration the voices of the communities in these districts.

35. Despite the insistence that this would strengthen these districts, there is no doubt that these districts will suffer from losing some core communities that are not preserved from prior districts, as well as not maintaining communities of interest.

36. More time was spent by the Council with the advocates of the so-called UNITY map, some of whom may not live in the City of Boston, than listening to the voices of the communities that will bear the brunt of the irreparable harm that this redistricting will cause.

37. I tried to offer support for the recommended criteria to be formally considered and adopted by our body.

38. I also argued that already established communities of interest, such as public housing residents, should be respected, united and factored in.

39. My request was denied, as was my request to hold off on a vote and to seek more community meetings in various languages.

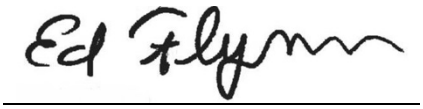
40. The process lacked transparency and it was completely flawed.

41. We failed as a collective body to respect the most impacted by our decision, residents living in public housing and our immigrant neighbors.

42. We failed as a city to include the voices and opinions of communities of color, immigrants and public housing residents during the redistricting debate.

43. The current map that was approved, and the process that led to it, has not done right by the neighbors living in my district in public housing in South Boston, and the rushed process was not done right for the residents across the City of Boston.

Signed under the pains and penalties of perjury this 18th day of November, 2022.



Edward Flynn

EXHIBIT Q

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

SUPERIOR COURT DEPARMTENT
CIVIL ACTION NUMBER: 2284CV02490

ROBERT O'SHEA, Individually and as Chairman of the Ward 6 Democratic Committee, RITA DIXON, SHIRLEY SHILLINGFORD, MAUREEN FEENEY, PHYLLIS CORBITT, Individually and as President of the Massachusetts Union of Public Housing Tenants, THE SOUTH BOSTON CITIZENS ASSOCIATION, MARTIN F. MCDONOUGH AMERICAN LEGION POST, ST. VINCENT'S LOWER END NEIGHBORHOOD ASSOCIATION, and OLD COLONY TENANT ASSOCIATION,

Plaintiffs,

v.

THE BOSTON CITY COUNCIL,

Defendant.

AFFIDAVIT OF FRANK BAKER

I, Frank Baker, under oath, do depose and say as follows:

1. My name is Frank Baker, and I am the Boston City Councilor for District Three and a resident of Dorchester.

2. The redistricting map the Boston City Council approved on November 2, 2022, and the actions taken by my colleagues on the City Council indicates that the goal of the redistricting map is to split up the southeastern part of District Three, though there was no Voting Rights Act violation to remedy under the District Council maps approved in 2012.

3. For Councilors to state empathically - prior to a proper and thorough review of each map filed, that certain recommendations were a "non-starter" for initial discussions to take place, is not

only unjust to each author, but also the respective district. Equally alarming is the fact that the Southeastern part of Dorchester was not granted the same protection as every other Community of Interest.

4. The City Council redistricting process was disingenuous, lacked accessibility, disregarded standard redistricting criteria all in an effort to dilute the vote of communities who have been organized around common public interests, working together for Generations.

5. District Three has historically contained a cohesive network of neighborhood civic organizations who unite in support of their common interests in areas such as public safety, education, economic development, green space preservation and resiliency, transportation, as well as other quality of life issues that stitch together the cohesive neighborhoods of Neponset and Cedar Grove.

6. The jurisdictional boundaries of our civic groups like many of Dorchester's neighborhoods and villages also coincide with our parish boundaries, which have also served as historic district boundaries on the southwestern border of District 3 since its formation.

7. The neighborhoods of Dorchester from St. Margaret's to St. Gregory's Church, including all of the villages in between, come together as a diverse community through youth sports programs, art, dance, and theater groups, senior housing and services as well as other social and cultural activities and engagements like the Dorchester Day Parade.

8. As the District Three City Councilor, it is my duty to represent my constituents who have sent me to the Boston City Council to advocate for and preserve this intersectional community and declare a violation of their voting rights in Docket #1275's redistricting map.

9. There is an extraordinary disruption of District Three, by removing the core of its district from its historical home – without cause or necessity.

10. This District has been historically integrated through its diverse transportation network including home to the MBTA's Redline from JFK to Cedar Grove station.

11. The District's neighborhood civic groups built an environmental coalition of residents to come together in support of the creation of the Neponset River Greenway that stretches from Cedar Grove Cemetery to Neponset Park to Pope John Paul II Park to Hon. Joseph Finnegan Park to Tenean Beach and soon to Victory Park and Dorchester Bay-constituting Old Harbor, Dorchester Shores, and Neponset River Reservations- connecting the greenway to Boston's Harborwalk along the waterfront. The success of the aforementioned efforts, was realized as a direct result of the neighborhood civic group's decades long advocacy, holding their local, state and federal representatives accountable to the response culminating in the historic cleanup of Boston Harbor as well as the creation of the Boston Harborwalk and the Neponset River Greenway network.

12. Under Docket #1275 there are no clear boundaries for District Three, unlike previous redistricting years (1983, 1993, 2003, 2013) Dorchester Avenue and the Neponset River are not just boundaries, but also are common interests on important issues facing the City of Boston including transportation, business, and environment concerns including coastal flooding.

13. These two boundaries give District Three common interests from South to North.

14. I believe the purpose of redistricting should be more than just balancing populations.

15. Each City Council district should have its own unique objective.

16. The proposed map that I offered, Docket #1273, along with Docket #1351 offered by Councilor Flaherty and Docket # 1215 offered by Councilor Murphy, and myself all provide a means by which population can be equalized with minimal impact to cohesive communities of interest.

17. The proposed map not only pulls apart District Three, but also causes significant harm to other communities, including South Boston whose public housing communities get divided as well as the Mattapan neighborhood, which gets split in half at the far edges of District Four and Five, diluting the voice of African American voters and language minorities, violations of the Voting Rights Act, the United States and Massachusetts Constitutions, and Massachusetts General Laws.

18. There is no evidence of "packing" in District Four, as confirmed by the City of Boston's outside Redistricting counsel, Professor Jeffrey Wice, Esq. of the New York Law School on Tuesday October 25, 2022.

19. Based on the precinct level election data analysis of my competitive elections in 2015 and 2021 as well as the most recent statewide 2022 general elections, no racial polarization exists in District Three.

20. No significant government purpose exists requiring a remedy that includes dividing historically aligned communities and therefore this map must be overturned by the Court in favor of a redistricting map that follows local, state, and federal laws as well standard redistricting criteria.

Signed under the pains and penalties of perjury this 18th day of November 2022.

Frank Baker

Frank Baker

EXHIBIT R

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

SUPERIOR COURT DEPARTMENT
CIVIL ACTION NUMBER: 2284CV02490

ROBERT O'SHEA, Individually and as Chairman of the Ward 6 Democratic Committee, RITA DIXON, SHIRLEY SHILLINGFORD, MAUREEN FEENEY, PHYLLIS CORBITT, Individually and as President of the Massachusetts Union of Public Housing Tenants, THE SOUTH BOSTON CITIZENS ASSOCIATION, MARTIN F. MCDONOUGH AMERICAN LEGION POST, ST. VINCENT'S LOWER END NEIGHBORHOOD ASSOCIATION, and OLD COLONY TENANT ASSOCIATION,

Plaintiffs,

v.

THE BOSTON CITY COUNCIL,

Defendant.

AFFIDAVIT OF ERIN MURPHY

I, Erin Murphy, under oath, do depose and say as follows:

1. My name is Erin Murphy, and I am an at-large Boston City Councilor and a resident of Boston.

2. The map the Boston City Council approved on November 2, 2022, is based on race in violation of the Voting Rights Act ("VRA") and the Fourteenth Amendment.

3. The approved map does not focus on creating voting opportunity neighborhoods for particular minority groups but instead focuses on the non-white populations as if they were a homogeneous group in each City Council District in violation of the VRA and the 14th Amendment.

4. The approved map focuses on City Council District 3 as being "too white" in violation of the VRA and the 14th Amendment.

5. The approved map does not distinguish between different minority groups but adds all minority group's total populations without regard for the vast differences in background, language, history, voting strengths, political goals, etc., in order to achieve "racial balance" in violation of the VRA and the 14th Amendment.

6. The approved map dismantles the compact City Council District 3 boundary along Dorchester Ave, a straight, natural, dividing boundary, and substitutes a gerrymandered, wandering boundary in order to achieve "racial balancing" in violation of the VRA and the 14th Amendment.

7. The approved map is designed to diminish the voting power of white voters in City Council District 3 whose rights are sacred under the VRA and the 14th Amendment.

8. The approved map destroys the Cedar Grove neighborhood ignoring the requirement to preserve existing communities of related and mutual interest. The Cedar Grove neighborhood hugs the Neponset River on the south and encompasses Cedar Grove Cemetery and Dorchester Park both dating back to the 1800's

9. The approved map does this in order to achieve "racial balancing" in violation of the VRA and the 14th Amendment.

10. Because race is considered a "suspect class" by the courts in 14th amendment Equal Protection cases, redistricting maps cannot be drawn primarily on the basis of race.

11. The stated goal of the approved map is to make District 4 less black and District 3 less white.

12. Councilor Breadon expressed fear that the majority black population of District 4 could invite accusations of "packing" which is the term used to describe the practice of drawing district lines so that minority voters are compressed into a small number of districts when they could effectively control more.

13. Using this reasoning, the approved map swaps majority black precincts in District 4 with majority white precincts in District 3 in order to make District 4 less black and District 3 less white.

14. District 3, under the existing plan before redistricting, does not have a majority race, and there is no evidence whatsoever that the widely diverse groups of American blacks, Vietnamese, Cape Verdean, Haitian and Dominican people in District 3, that is the non-white people, are a cohesive minority and they are surely not a single minority.

15. However, the precincts that comprise the Cedar Grove neighborhood are majority white neighborhoods.

16. Using a "racial balancing" criteria, the approved map carves these precincts out of District 3 purely on the basis of race, in violation of the VRA and the 14th Amendment.

17. This is an example of "cracking" which is the practice of drawing District boundaries that split or fracture voting groups to diminish their ability to elect officials that represent their interests.

18. District 3, under the existing plan before redistricting and termed "too white" by the Council, has a history of electing black officials. Linda Dorcena Forrey was elected as the State Representative in 2004 and reelected until 2012 when she was elected as State Senator. That Senate District, Suffolk District 1, overlays City Council District 3 almost entirely. She was reelected until 2018 when she retired from politics.

19. The specific precincts that the approved map carves out of District 3 voted overwhelmingly in the 2022 primary and final for Attorney General candidate Andrea Campbell, a black woman.

20. Also, District 4's black majority (also attacked and diluted by the approved map) has created a significant political power base for the black community resulting in electing black councilors for over four decades along with a U.S Representative, State Senators and State Representatives.

21. Councilor Breadon, an author of the approved map, celebrated accomplishing the goal of transforming District 3 into a majority minority district at a City Council meeting, a goal

achieved by making District 3 less white. Councilor Arroyo, co-author of the approved plan, was quoted as saying that District 3 was "too white."

22. The approved map achieves this unconstitutional "racial balancing" by pretending that all non-white citizens of Boston belong to a homogeneous group that has one set of political goals and is opposed to all of their white neighbors, their views, and their political goals.

23. This type of belief divides the people of Boston and flames the hatred of those who believe that there is such a thing as a better race of people.

24. The goal of the VRA is to create opportunities for people who have been discriminated against by deliberate governmental policies so they can build communities and neighborhoods where they can accumulate sufficient numbers to have their voices heard in the political process. The Voting Rights Act protects people from the very goals of the approved map.

25. The Little Saigon neighborhood is a vital part of District 3 that spans Dorchester Avenue in the Fields Corner neighborhood of Dorchester. It is a vibrant area and is home to 75% of Vietnamese Americans in the city of Boston. These neighbors are mostly first and second-generation immigrants from a country in south East Asia, with a rich culture, extremely strong family and religious values, and a deep commitment to education. This is a classic example of a neighborhood that the VRA intends to gather as a minority opportunity neighborhood.

26. The first black community of Dorchester came almost exclusively from the southern states fleeing discrimination and poverty in the 1960's. These were the descendants of slaves and came north for work and to escape Jim Crow laws. In 1965 a new wave of blacks arrived in Dorchester: Haitians, Cape Verdeans, West Indians and Dominicans. Although they

shared a skin color with the recently settled Southern blacks, in all other respects they were a widely diverse group with little in common: an eclectic mix of languages, religions, native countries, education levels, goals and aspirations.

27. The approved map lumps all of these divergent people; Vietnamese, American blacks, Haitians, Cape Verdeans, West Indians and Dominicans; into one category calling them people of color, or minority. The accurate descriptor in the approved map is non-white.

28. The approved map divides District 3 into two groups: white and non-white, ignoring the immense differences in each of the categories. There is no cohesive history, ethnicity, religion, language, or culture that binds them into a recognizable group with a compact and united neighborhood that should create an opportunity neighborhood.

29. The goal of equal population distribution across districts could have been achieved without damaging the existing neighborhood in Districts 2, 3, and 4, and without an improper focus on "racial balancing" as the driving force behind redistricting.

30. The proposed maps provided by myself, as well as Councilors Flynn, Baker, and Flaherty all achieve the goals of redistricting with minimal impact to neighborhood cohesiveness and without an improper focus on race.

Signed under the pains and penalties of perjury this 16 day of November, 2022.

Erin Murphy

EXHIBIT S

STEPHEN F. LYNCH
8TH DISTRICT, MASSACHUSETTS

COMMITTEE ON FINANCIAL SERVICES

COMMITTEE ON OVERSIGHT AND REFORM
CHAIRMAN, SUBCOMMITTEE ON NATIONAL SECURITY

COMMITTEE ON TRANSPORTATION AND INFRASTRUCTURE

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November 8, 2022

The Honorable Anthony M. Campo, Jr.
Justice
Suffolk County Superior Court
3 Pemberton Square
Boston, MA 02108

Re: Civil Case No. 2284CV2490 H

Dear Justice Campo:

As Representative of the 8th Congressional District of Massachusetts, I am writing in strong opposition to the Proposed Redistricting Plan (Docket #1275) approved by the Boston City Council on November 2, 2022.

The U.S. Supreme Court has articulated several fundamental principles that guide its determination as to whether a particular local, state, or federal redistricting proposal is compliant with the U.S. Constitution and federal voting rights law. As set forth in *Shaw v. Reno*, *Miller v. Johnson*, *Bush v. Vera*, *Johnson v. De Grandy*, and other cases, "traditional districting principles" include a respect for the preservation of communities of common interest, political subdivisions, and the cores of existing districts as well as an adherence to geographic compactness and continuity.[1] These principles have been codified at the state level – with MASS. GEN. LAWS Ch. 43, §131 providing that city districts "shall be compact … shall be composed of contiguous existing precincts and shall be drawn with a view toward preserving the integrity of existing neighborhoods." They are also reflected in the criteria issued by the Boston City Council Committee on Redistricting at the outset of its mapping work; importantly, the Committee stipulated that it would prioritize the "preservation of neighborhoods and communities" to ensure the fairness of the redistricting process.[2]

In its redistricting jurisprudence, the Court has particularly underscored the importance of preserving communities or neighborhoods of common interest. As stated in *Miller*, *supra*, a community of common interest is defined as a group of individuals with "actual shared interests" – including collective political, social, cultural, and economic interests. In *Lawyer v. Department of Justice*, the Court elaborated that a community of common interest can comprise

[1] 509 U.S. 630 (1993); 515 U.S. 900 (1995); 517 U.S. 952 (1996); 512 U.S. 997 (1994)
[2] "2022 Redistricting in Boston." Boston.gov, 24 Mar. 2022, https://www.boston.gov/departments/city-council/2022-redistricting-boston.

a predominantly urban, low-income population whose members "share a similarly depressed economic condition and interests that reflect it" and even "regard themselves as a community."[3] As reiterated by the Court in *League of United Latin American Citizens v. Perry*, shared interests among a community can include socioeconomic status, education, employment, health, and other related characteristics.[4]

In addition to its core redistricting principles, the Court has also repeatedly referenced and addressed the critical protections included in Section 2 of the landmark *Voting Rights Act of 1965* – prohibiting discrimination in any electoral standard, practice, or procedure on the basis of race, color, or membership in a language minority group. In particular, the Court explained in *Thornburg v. Gingles* that prohibited vote dilution, as conceived by the *Voting Rights Act*, relates to the "loss of political power" by a minority voting bloc that is politically cohesive and geographically compact and whose members have disproportionately borne the effects of discrimination in education, employment, health, and other areas.[5] The Department of Justice references this judicial precedent and the detrimental impact of vote dilution in its 2021 guidance for redistricting authorities – highlighting that Section 2 of the *Voting Rights Act* "prohibits, among other things, any electoral practice or procedure that minimizes or cancels out the voting strength of members of racial or language minority groups in the voting population."[6]

Regrettably, the Proposed Redistricting Plan at issue stands in stark contrast to fundamental redistricting principles and Supreme Court precedent. In my own congressional district, the City Council proposal will arbitrarily and recklessly divide longstanding and close-knit public housing developments – including the Anne M. Lynch Holmes at Old Colony and West Broadway Development – among multiple city districts. These public housing communities are classic communities of interest in the legal sense as they predominantly consist of non-English-speaking, low-income families of color who are kindred in socioeconomic status, education, employment, and their common identity as recently arrived immigrants. In addition to living in the same public housing developments, these families also share common landlords, property managers, rents, and utilities and are largely united as a community in their priorities and grievances. Clearly, these public housing communities are communities of common interest whose abrupt division into multiple city districts will unfairly and irreparably dilute their voting power and encumber them with unfamiliar and disparate political representation.

To divide these communities is also inconsistent with the Redistricting Committee's own stated principles that it would prioritize the "preservation of neighborhoods and communities" to ensure the fairness of the redistricting process. The Proposed Redistricting Plan should be adjusted to preserve, rather than capriciously partition, the communities of interest in their traditional districts. Such modification would ensure the degree of fairness in the redistricting process that the voters deserve. The failure to safeguard these communities against division not only neglects to preserve the cores of the preexisting districts but could very well have the

[3] 521 U.S. 567 (1997)
[4] 548 U.S. 399 (2006)
[5] 478 U.S. 30 (1986)
[6] "Guidance under Section 2 of the Voting Rights Act, 52 U.S.C. 10301, for ..." Justice.gov, U.S. Department of Justice, 1 Sept. 2021, https://www.justice.gov/opa/press-release/file/1429486/download.

potential to weaken the voting strength of these politically cohesive and like-minded voters in future City Council elections.

Thank you in advance for your consideration. If you have any questions regarding this letter, please feel free to contact me directly.

Sincerely,

STEPHEN F. LYNCH
Member of Congress (MA-08)

Date Filed 11/21/2022 3:48 PM
Superior Court - Suffolk
Docket Number 2284CV02490

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COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

SUPERIOR COURT DEPARMTENT
CIVIL ACTION NUMBER: 2284CV02490

ROBERT O'SHEA, Individually and as Chairman of the Ward 6 Democratic Committee, RITA DIXON, SHIRLEY SHILLINGFORD, MAUREEN FEENEY, PHYLLIS CORBITT, Individually and as President of the Massachusetts Union of Public Housing Tenants, THE SOUTH BOSTON CITIZENS ASSOCIATION, MARTIN F. MCDONOUGH AMERICAN LEGION POST, ST. VINCENT'S LOWER END NEIGHBORHOOD ASSOCIATION, and OLD COLONY TENANT ASSOCIATION,

Plaintiffs,

v.

THE BOSTON CITY COUNCIL,

Defendant.

PLAINTIFFS' SUPPLEMENTAL MEMORANDUM IN SUPPORT OF APPLICATION FOR PRELIMINARY INJUCTION PURSUANT TO MASS.R.CIV.P 65(b)

Now Come the Plaintiffs and respectfully submit this memorandum of law in support of Plaintiffs' Application for Preliminary Injunction against the Defendant Boston City Council pursuant to Mass. R. Civ. P. 65(b).

I. Facts

This action relates to the Redistricting Plan (Docket #1275) that was approved by the Boston City Council on November 2, 2022. This Redistricting Plan was motivated by a desire to achieve "racial balancing" between various Districts in the City of Boston. Primarily, the goal was to make white-majority districts less white, and African-American majority districts less black.

Date Filed 11/21/2022 3:48 PM
Superior Court - Suffolk
Docket Number 2284CV02490

In order to achieve the desired results, the City Council engaged in secretive and inaccessible meetings at which the citizens of the effected districts did not have sufficient access under the Open Meeting Law. Specifically, language access was not provided to many language minority residents. Also, the final Redistricting Plan was not provided to Councilors and the general public until less than 48 hours before the scheduled vote.

On November 2, 2022, the City Council voted 9-4 to approve the Redistricting Plan. A full recitation of the applicable facts is included in Plaintiffs' First Amended Complaint, filed herewith. Councilor Liz Breadon became the Char of Redistricting on August, 29, 2022.

II. Argument

To determine whether a preliminary injunction should issue, the Court is to follow the three-step analysis laid out by the Supreme Judicial Court in Packaging Industries Group v. Cheney, 380 Mass. 609 (1980). First, the Court "evaluates in combination the moving party's claim of injury and chance of success on the merits." Id. at 617. Next, if the Court finds that failure to issue the order would subject the movant to "a substantial risk of irreparable harm," then the Court must then balance such harm against the injury to the nonmovant if the order is granted together with the nonmovant's chance of succeeding on the merits. Id. Lastly, the Court must balance the risk of irreparable harm to the movant against the injury to the nonmovant if the injunction is granted or denied with their respective chances of succeeding on the merits. Id. When the balance between these risks, together with their respective chances of success on the merits, "cuts in favor of the moving party" then a preliminary injunction should issue. Id.

A. Likelihood of Success on the Merits

1. The Open Meeting Law

The Open Meeting Law, G. L. c. 39, §§ 23A-23C, was enacted by the Legislature because "It is essential to a democratic form of government that the public have broad access to the decisions made

Date Filed 11/21/2022 3:48 PM
Superior Court - Suffolk
Docket Number 2284CV02490

by its elected officials and to the way in which the decisions are reached." Foudy v. Amherst-Pelham Regional Sch. Comm., 402 Mass. 179, 184 (1988). The Supreme Judicial Court held that ""the general provision[s] of ... the Open Meetings Law are to be broadly and liberally construed in order to effectuate the legislative purpose of openness." General Elec. Co. v. Department of Envtl. Protection, 429 Mass. at 806 n.9, *quoting from* Cella, Administrative Law and Practice § 1186, at 592 n.16 (1986).

As described in the First Amended Complaint, and in Exhibit J thereto, the Boston City Council repeatedly violated the Open Meeting Law. Specifically, meetings on October 10, 2022, October 18, 2022, and October 19, 2022 were not properly noticed. "All meetings of a governmental body shall be open to the public." G. L. c. 39, § 23B, first par., as appearing in St. 1976, c. 397, § 6. "[N]otice of every meeting of any governmental body shall be filed with the clerk of the city ... in which the body acts, and the notice or a copy thereof shall, at least forty-eight hours ... prior to such meeting, be publicly posted in the office of such clerk or on the principal official bulletin board of such city." G. L. c. 39, § 23B, sixth par.

These meetings (and presumably other secret meetings) were not properly noticed and did not give the public an opportunity to engage in the deliberative and legislative process. Moreover, the City Council's failure to provide access to language minority residents (see Exhibits F through I attached to the First Amended Complaint) further limited public access to these governmental proceedings.

At least two Open Meeting Law complaints have been filed against the City Council in relation to these meetings (Exhibits J and K). Despite these complaints, the City Council proceeded to a vote on the Redistricting Plan on November 2, 2022. Alarmingly, the final proposed map (Docket #1275) was not provided to the other Councilors or to the public until less than 48 hours before the scheduled vote.

Throughout the process, the City Council has pushed to pass this unconstitutional and illegal Redistricting Plan without giving adequate notice of meetings, without providing meaningful access to

Date Filed 11/21/2022 3:48 PM
Superior Court - Suffolk
Docket Number 2284CV02490

language minority residents, and with secretive plans not revealed until the eleventh hour before the eventual vote.

For these reasons, the Plaintiffs respectfully request that this Honorable Court find that the City Council violated the Open Meeting Law.

2.The Voting Rights Act

Section 2 of the Voting Rights Act of 1965, 52 U.S.C. § 10301, prohibits voting practices or procedures that discriminate on the basis of race, color, or membership in a language minority group. This prohibition applies nationwide to any voting qualification or prerequisite to voting or standard, practice, or procedure, including districting plans and methods of election for governmental bodies. Growe v. Emison, 507 U.S. 25, 39-40 (1993). Section 2 also prohibits adopting or maintaining voting practices for the purpose of disadvantaging citizens on account of race, color, or membership in a language minority group. Chisom v. Roemer, 501 U.S. 380, 394 n.21 (1991). "To prevail on a s. 2 claim, plaintiffs need not show discriminatory purpose; rather, they must first meet the three threshold Gingles conditions: (1) that they are a part of a minority group that is "sufficiently large and geographically compact to constitute a majority in a single-member district"; (2) that the plaintiff minority group is "politically cohesive"; and (3) that "the white majority votes sufficiently as a bloc to enable it - in the absence of special circumstances, such as the minority candidate running unopposed - usually to defeat the minority's preferred candidate." Meza v. Galvin, 332 F. Supp. 2d 52 (D. Mass. 2004), *quoting* Thorburg v. Gingles, 478 U.S. 30, 50-51 (1986).

There can be no doubt that District Four contains a minority group (African-Americans) that is sufficiently large and compact to constitute a majority in the District. The Redistricting Plan approved by the City Council effective splits District Four, transferring African-American votes out of the district and receiving primarily white votes in return. This "cracking" of a historically African-

Date Filed 11/21/2022 3:48 PM
Superior Court - Suffolk
Docket Number 2284CV02490

American district will result in the dilution of the African-American vote in that District and critically endanger the opportunity to elect the minority's preferred representative.

As described more fully in the First Amended Complaint, the stated goal of the City Council was "racial balancing" of districts. In attempting to racially balance Districts 2, 3, and 4, the City Council has diluted the power of the African-American vote in what is currently District 4. As stated above, Plaintiffs need not show that the City Council intended to discriminate against African-American voters, only that a dilution of the minority majority vote will occur as result of the redistricting.

For these reasons, Plaintiffs respectfully request that this Honorable Court enter an order finding that the Redistricting Plan approved by the City Council violates Section 2 of the Voting Rights Act.

3.The Fourteenth Amendment

The Fourteenth Amendment to the United States Constitution provides, in pertinent part that "No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws."

The Equal Protection Clause prohibits a state, "without sufficient justification, from 'separat[ing] its citizens into different voting districts on the basis of race.'" Bethune-Hill v. Va. State Bd. of Elections, 137 S. Ct. 788, 797 (2017) Race-based lines, therefore, are unconstitutional where (1) "race was the predominant factor motivating the legislature's decision to place a significant number of voters within or without a particular district," and (2) the district's design cannot withstand strict scrutiny. Miller v. Johnson, 515 U.S. 900, 916 (1995). To pass strict scrutiny, the state must prove that its race-based redistricting scheme is "narrowly tailored" to meet a "compelling interest." Bethune-

Date Filed 11/21/2022 3:48 PM
Superior Court - Suffolk
Docket Number 2284CV02490

Hill, 137 S. Ct. at 801. As discussed hereinabove, the primary (if not the only) goal of the City Council was to engage in "racial balancing" of various districts.

In order to show a violation of the Equal Protection Clause , Plaintiffs must show "either through circumstantial evidence of a district's shape and demographics or more direct evidence going to legislative purpose, that race was the predominant factor motivating the legislature's decision to place a significant number of voters within or without a particular district." Miller, 515 U.S. at 916. "To make this showing, a plaintiff must prove that the legislature subordinated traditional race-neutral districting principles, including but not limited to compactness, contiguity, and respect for political subdivisions or communities defined by actual shared interests, to racial considerations." Id.

The City Council throughout the redistricting process has repeatedly claimed that the motivation for the Redistricting Map was "racial balancing". The express intent of the City Council should be determinative of the fact that the Redistricting Map was based primarily (if not solely) on racial considerations. Other evidence supports this outcome as well. The Boston City Charter provides that during redistricting "Each such district shall be compact and shall contain, as nearly as may be, an equal number of inhabitants as determined by the most recent state decennial census, shall be composed of contiguous existing precincts, and shall be **drawn with a view toward preserving the integrity of existing neighborhoods.**" Boston City Charter § 18 (emphasis added). G.L. c. 43 § 131 contains identical language. Similarly, the memorandum provided to the City Council by Professor Wice at their request states that such preservation of neighborhoods is a required criteria of redistricting. Exhibit O to Amended Complaint. Specifically, Prof. Wice states that "Consideration must be given to drawing districts that respect the boundaries of Boston's recognized neighborhoods." Id.

As discussed hereinabove and more fully in the Amended Complaint, the Redistricting Plan eviscerates the neighborhoods in Districts 2, 3, and 4. Mattapan and Dorchester are each effectively

Date Filed 11/21/2022 3:48 PM
Superior Court - Suffolk
Docket Number 2284CV02490

split in two, and South Boston loses neighborhoods that have been historically connected to District 2 for many years. The failure of the City Council to protect any of these neighborhoods belies their intent to redistrict solely based on race, and to ignore any other criteria.

Also, as described eloquently in Congressman Lynch's letter to the Court (Exhibit S to the Amended Complaint), the Redistricting Plan divides public housing developments, diluting the power of public housing residents who share many things in common from pooling their power to elect their chosen representatives and to effect significant change.

Lastly, the City Council's reckless push for "racial balance" does not even achieve the goal it seeks. Boston is a very diverse city, with many Hispanics, Vietnamese, Haitians, Cape Verdeans, Chinese, and various other significant minority groups. However, the City Council's Redistricting Plan ignores the various minority groups, and instead focuses solely on a matter of white vs. non-white. In doing so, the City Council has also uprooted and divided neighborhood of minority residents who collectively will suffer a diminution of their collective voting power if spread across multiple districts.

It is easy to see why the Fourteenth Amendment prohibits redistricting based on race except in the most extreme circumstances. Although the City Council did need to shift some precincts to other districts in order to meet the population requirements of the City Charter, the proposed maps from Councilors Murphy, Flynn, Baker, and Flaherty all address the population shift without causing unnecessary damage to existing neighborhoods.

Because the City Council's Redistricting Plan is based primarily on race, the Plaintiffs respectfully request that this Honorable Court enter an order finding that the Redistricting Plan violates the Fourteenth Amendment.

Date Filed 11/21/2022 3:48 PM
Superior Court - Suffolk
Docket Number 2284CV02490

B. Irreparable Harm

Plaintiffs face imminent and irreparable harm if the preliminary injunction is not granted. As residents of the effected districts, the Plaintiffs are rightfully concerned about the Redistricting Plan and its effect on the integrity of existing communities, as well as the negative effect it will have on the political power and cohesiveness of its most vulnerable residents. The deprivation of Plaintiffs' constitutional rights constitutes irreparable harm. T & D Video, Inc. v. City of Revere, 423 Mass. 577, 582 (1996). Because Plaintiffs raise a substantial constitutional claim, no further showing of irreparable harm is necessary. Id.; *see also, e.g.,* Coleman v. Bd. of Ed. of the City of Mt. Vernon, 990 F. Supp. 221, 226 (S.D.N.Y. 1997) ("the deprivation or dilution of voting rights constitutes irreparable harm.").

C. Balance of Harms

There is no harm to the City Council that could result from the issuance of a preliminary injunction at this time. According to the City of Boston Corporation Counsel, the only explicit statutory deadline set forth in the Boston City Charter is that City Council districts be redrawn by August 1, 2026. The City Council has plenty of time to get this right.

On the other hand, the harms to the voters of the effected districts are severe. And constitutional deprivation is severe, but the damage done to the right to vote, a core right of American citizens, is as significant a harm as one can endure. Plaintiffs ask only that the City Council engage the community in the Redistricting Process and follow the Required Criteria in the City Charter to preserve the integrity of neighborhoods. Plaintiffs also ask that the City Council pursue redistricting in a race-neutral manner, with careful though given to the various communities affected by the redistricting process.

Date Filed 11/21/2022 3:48 PM
Superior Court - Suffolk
Docket Number 2284CV02490

III. Conclusion

For the foregoing reasons, Plaintiff respectfully requests this Court issue a preliminary injunction enjoining the Defendant Boston City Council from enacting the Redistricting Plan (Docket #1275) approved by the Boston City Council on November 2, 2022.

Respectfully submitted,
The Plaintiffs,
By their Attorneys,

/s/ Paul Gannon
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT A TRUE COPY OF THE ABOVE DOCUMENT WAS SERVED UPON THE ATTORNEY OF RECORD FOR EACH OTHER PARTY BY E-MAIL ON THIS THE 21st DAY OF NOVEMBER 2022.

/s/ Glen Hannington
Glen Hannington, Esquire

EXHIBIT C

2020 Real Rate Report®

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

Wolters Kluwer

When you have to be right

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Table of Contents - 2020 Real Rate Report

A Letter to Our Readers

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

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

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

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

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

Sincerely,

Jonah Paransky

Executive Vice President and General Manager

Wolters Kluwer's ELM Solutions

How to Use this Report

The 2020 Real Rate Report:

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

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

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

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

Some key factors[1] that drive rates[2]:

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

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

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

1 **Source: 2018 RRR.** Factor order validated in multiple analyses since 2010
2 **David Goguen, J.D., University of San Francisco School of Law (2017) Guide to Legal Services Billing** Retrieved from https://www.lawyers.com/legal-info/research/guide-to-legal-services-billing-rates.html

How to Use this Report

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

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

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

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Section I:
High-Level Data Cuts

2020 Real Rate Report

Section I: High-Level Data Cuts

Partners, Associates, and Paralegals

By Role

2019 -- Real Rates					Trend Analysis (Mean)		
Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Partner	14142	$400	$610	$894	$680	$659	$630
Associate	14341	$295	$425	$615	$479	$462	$439
Paralegal	6431	$150	$213	$289	$225	$211	$201

Section I: High-Level Data Cuts

Detailed Practice Areas

By Matter Type

2019 -- Real Rates for Partners, Associates, and Paralegals | **Trend Analysis (Mean)**

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

Section I: High-Level Data Cuts

Detailed Practice Areas

By Matter Type

2019 -- Real Rates for Partners, Associates, and Paralegals | **Trend Analysis (Mean)**

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

Section I: High-Level Data Cuts

Detailed Practice Areas

By Matter Type

2019 -- Real Rates for Partners, Associates, and Paralegals | **Trend Analysis (Mean)**

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

Section I: High-Level Data Cuts

Detailed Practice Areas

By Matter Type

2019 -- Real Rates for Partners, Associates, and Paralegals | **Trend Analysis (Mean)**

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

Section I: High-Level Data Cuts

Detailed Practice Areas

By Matter Type

2019 -- Real Rates for Partners, Associates, and Paralegals | **Trend Analysis (Mean)**

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

Section I: High-Level Data Cuts

Detailed Practice Areas

By Matter Type

2019 -- Real Rates for Partners, Associates, and Paralegals | **Trend Analysis (Mean)**

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

Section I: High-Level Data Cuts

Detailed Practice Areas

By Matter Type

2019 -- Real Rates for Partners, Associates, and Paralegals | **Trend Analysis (Mean)**

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

Section I: High-Level Data Cuts

Detailed Practice Areas

By Matter Type

2019 -- Real Rates for Partners, Associates, and Paralegals | **Trend Analysis (Mean)**

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

Section I: High-Level Data Cuts

Detailed Practice Areas

By Matter Type

2019 -- Real Rates for Partners, Associates, and Paralegals | **Trend Analysis (Mean)**

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

Section I: High-Level Data Cuts

Cities

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section I: High-Level Data Cuts

Cities

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section I: High-Level Data Cuts

Cities

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section I: High-Level Data Cuts

Cities

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section I: High-Level Data Cuts

Cities

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section I: High-Level Data Cuts

Cities

By Matter Type

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section I: High-Level Data Cuts

Cities

By Matter Type

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section I: High-Level Data Cuts

Cities

By Matter Type

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section I: High-Level Data Cuts

Cities

By Matter Type

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section I: High-Level Data Cuts

Cities

By Matter Type

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section I: High-Level Data Cuts

Cities

By Matter Type

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section I: High-Level Data Cuts

Cities

By Matter Type

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section I: High-Level Data Cuts

Cities

By Matter Type

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section I: High-Level Data Cuts

Cities

By Years of Experience

2019 -- Real Rates for Partners | **Trend Analysis (Mean)**

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

Section I: High-Level Data Cuts

Cities

By Years of Experience

2019 -- Real Rates for Partners | **Trend Analysis (Mean)**

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

Section I: High-Level Data Cuts

Cities

By Years of Experience

2019 -- Real Rates for Partners | **Trend Analysis (Mean)**

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

Section I: High-Level Data Cuts

Cities

By Years of Experience

2019 -- Real Rates for Partners | **Trend Analysis (Mean)**

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

Section I: High-Level Data Cuts

Cities

By Years of Experience

2019 -- Real Rates for Associates | **Trend Analysis (Mean)**

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

Section I: High-Level Data Cuts

Cities

By Years of Experience

2019 -- Real Rates for Associates | **Trend Analysis (Mean)**

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

Section I: High-Level Data Cuts

Cities

By Years of Experience

2019 -- Real Rates for Associates | **Trend Analysis (Mean)**

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

Section I: High-Level Data Cuts

Firm Size

By Matter Type

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section II:
Industry Analysis

Section II: Industry Analysis

Industry Groups

2019 -- Real Rates for Partners, Associates, and Paralegals | **Trend Analysis (Mean)**

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

Section II: Industry Analysis

Industry Groups

By Matter Type

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section II: Industry Analysis

Basic Materials and Utilities

By Practice Area and Matter Type

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section II: Industry Analysis

Consumer Goods

By Practice Area and Matter Type

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section II: Industry Analysis

Consumer Services

By Practice Area and Matter Type

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section II: Industry Analysis

Consumer Services

By Practice Area and Matter Type

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section II: Industry Analysis

Financials Excluding Insurance

By Practice Area and Matter Type

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section II: Industry Analysis

Financials Excluding Insurance

By Practice Area and Matter Type

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section II: Industry Analysis

Financials Excluding Insurance

By Practice Area and Matter Type

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section II: Industry Analysis

Healthcare

By Practice Area and Matter Type

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section II: Industry Analysis

Industrials

By Practice Area and Matter Type

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section II: Industry Analysis

Industrials

By Practice Area and Matter Type

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section II: Industry Analysis

Technology and Telecommunications

By Practice Area and Matter Type

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section II: Industry Analysis

Technology and Telecommunications

By Practice Area and Matter Type

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section III:
Practice Area Analysis

Section III: Practice Area Analysis

Bankruptcy and Collections

By City

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

Section III: Practice Area Analysis

Bankruptcy and Collections

By Years of Experience and Matter Type

2019 -- Real Rates for Partners

Trend Analysis (Mean)

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

2019 -- Real Rates for Associates

Trend Analysis (Mean)

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

Section III: Practice Area Analysis

Bankruptcy and Collections

By Firm Size and Matter Type

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section III: Practice Area Analysis

Commercial

By City

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section III: Practice Area Analysis

Commercial

By City

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section III: Practice Area Analysis

Commercial

By Years of Experience and Matter Type

2019 -- Real Rates for Partners

Trend Analysis (Mean)

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

2019 -- Real Rates for Associates

Trend Analysis (Mean)

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

Section III: Practice Area Analysis

Commercial

By Firm Size and Matter Type

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section III: Practice Area Analysis

Corporate - Mergers, Acquisitions, and Divestitures

By City

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section III: Practice Area Analysis

Corporate - Mergers, Acquisitions, and Divestitures

By Years of Experience and Matter Type

2019 -- Real Rates for Partners

Trend Analysis (Mean)

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

2019 -- Real Rates for Associates

Trend Analysis (Mean)

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

Section III: Practice Area Analysis

Corporate - Mergers, Acquisitions, and Divestitures

By Firm Size and Matter Type

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section III: Practice Area Analysis

Corporate - Regulatory and Compliance

By City

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section III: Practice Area Analysis

Corporate - Regulatory and Compliance

By Years of Experience and Matter Type

2019 -- Real Rates for Partners

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

2019 -- Real Rates for Associates

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

Section III: Practice Area Analysis

Corporate - Regulatory and Compliance

By Firm Size and Matter Type

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section III: Practice Area Analysis

Corporate - Other

By City

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section III: Practice Area Analysis

Corporate - Other

By City

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section III: Practice Area Analysis

Corporate - Other

By Years of Experience and Matter Type

2019 -- Real Rates for Partners — **Trend Analysis (Mean)**

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

2019 -- Real Rates for Associates — **Trend Analysis (Mean)**

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

Section III: Practice Area Analysis

Corporate - Other

By Firm Size and Matter Type

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section III: Practice Area Analysis

Employment and Labor

By City

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section III: Practice Area Analysis

Employment and Labor

By City

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

Section III: Practice Area Analysis

Employment and Labor

By Years of Experience and Matter Type

2019 -- Real Rates for Partners

Trend Analysis (Mean)

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

2019 -- Real Rates for Associates

Trend Analysis (Mean)

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

Section III: Practice Area Analysis

Employment and Labor

By Firm Size and Matter Type

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section III: Practice Area Analysis

Environmental

By City

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section III: Practice Area Analysis

Environmental

By Years of Experience and Matter Type

2019 -- Real Rates for Partners

Trend Analysis (Mean)

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

2019 -- Real Rates for Associates

Trend Analysis (Mean)

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

Section III: Practice Area Analysis

Environmental

By Firm Size and Matter Type

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section III: Practice Area Analysis

Finance and Securities

By City

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section III: Practice Area Analysis

Finance and Securities

By City

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

Section III: Practice Area Analysis

Finance and Securities

By Years of Experience and Matter Type

2019 -- Real Rates for Partners

Trend Analysis (Mean)

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

2019 -- Real Rates for Associates

Trend Analysis (Mean)

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

Section III: Practice Area Analysis

Finance and Securities

By Firm Size and Matter Type

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section III: Practice Area Analysis

General Liability - Litigation Only

By City

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section III: Practice Area Analysis

General Liability - Litigation Only

By City

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section III: Practice Area Analysis

General Liability - Litigation Only

By Years of Experience and Matter Type

2019 -- Real Rates for Partners

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

2019 -- Real Rates for Associates

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

Section III: Practice Area Analysis

General Liability - Litigation Only

By Firm Size and Matter Type

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

Section III: Practice Area Analysis

Insurance Defense - Litigation Only

By City

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section III: Practice Area Analysis

Insurance Defense - Litigation Only

By City

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section III: Practice Area Analysis

Insurance Defense - Litigation Only

By City

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section III: Practice Area Analysis

Insurance Defense - Litigation Only

By Years of Experience and Matter Type

2019 -- Real Rates for Partners

Trend Analysis (Mean)

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

2019 -- Real Rates for Associates

Trend Analysis (Mean)

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

Section III: Practice Area Analysis

Insurance Defense - Litigation Only

By Firm Size and Matter Type

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section III: Practice Area Analysis

Intellectual Property - Patents

By City

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section III: Practice Area Analysis

Intellectual Property - Patents

By Years of Experience and Matter Type

2019 -- Real Rates for Partners

Trend Analysis (Mean)

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

2019 -- Real Rates for Associates

Trend Analysis (Mean)

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

Section III: Practice Area Analysis

Intellectual Property - Patents

By Firm Size and Matter Type

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section III: Practice Area Analysis

Intellectual Property - Trademarks

By City

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

Section III: Practice Area Analysis

Intellectual Property - Trademarks

By Years of Experience and Matter Type

2019 -- Real Rates for Partners

Trend Analysis (Mean)

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

2019 -- Real Rates for Associates

Trend Analysis (Mean)

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

Section III: Practice Area Analysis

Intellectual Property - Trademarks

By Firm Size and Matter Type

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section III: Practice Area Analysis

Intellectual Property - Other

By City

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

Section III: Practice Area Analysis

Intellectual Property - Other

By Years of Experience and Matter Type

2019 -- Real Rates for Partners

Trend Analysis (Mean)

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

2019 -- Real Rates for Associates

Trend Analysis (Mean)

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

Section III: Practice Area Analysis

Intellectual Property - Other

By Firm Size and Matter Type

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section III: Practice Area Analysis

Real Estate

By City

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section III: Practice Area Analysis

Real Estate

By City

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section III: Practice Area Analysis

Real Estate

By Years of Experience and Matter Type

2019 -- Real Rates for Partners

Trend Analysis (Mean)

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

2019 -- Real Rates for Associates

Trend Analysis (Mean)

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

Section III: Practice Area Analysis

Real Estate

By Firm Size and Matter Type

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section IV: In-Depth Analysis for Select US Cities

Section IV: In-Depth Analysis for Select US Cities

Boston MA

By Practice Area and Firm Size

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section IV: In-Depth Analysis for Select US Cities

Chicago IL

By Practice Area and Firm Size

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section IV: In-Depth Analysis for Select US Cities

Chicago IL

By Practice Area and Firm Size

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

Section IV: In-Depth Analysis for Select US Cities

Chicago IL

By Practice Area and Firm Size

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section IV: In-Depth Analysis for Select US Cities

Los Angeles CA

By Practice Area and Firm Size

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section IV: In-Depth Analysis for Select US Cities

Los Angeles CA

By Practice Area and Firm Size

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section IV: In-Depth Analysis for Select US Cities

New York NY

By Practice Area and Firm Size

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section IV: In-Depth Analysis for Select US Cities

New York NY

By Practice Area and Firm Size

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section IV: In-Depth Analysis for Select US Cities

New York NY

By Practice Area and Firm Size

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

Practice Area	Firm Size	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Employment and Labor: Discrimination, Retaliation and Harassment / EEO	201-500 Lawyers	Associate	13	$335	$390	$415	$454	$447	$616
	501-1,000 Lawyers	Partner	28	$450	$473	$546	$571	$622	$533
		Associate	27	$290	$315	$325	$326	$421	$317
	More Than 1,000 Lawyers	Partner	11	$640	$758	$829	$753	$735	$746
Employment and Labor: Other	50 Lawyers or Fewer	Partner	21	$490	$646	$796	$630	$588	$562
		Associate	18	$303	$383	$475	$405	$391	$372
	51-200 Lawyers	Partner	11	$610	$680	$750	$662	$547	$602
	201-500 Lawyers	Partner	73	$553	$695	$760	$685	$648	$645
		Associate	73	$350	$410	$595	$466	$426	$426
	501-1,000 Lawyers	Partner	107	$470	$585	$810	$690	$753	$730
		Associate	72	$325	$411	$680	$515	$596	$532
	More Than 1,000 Lawyers	Partner	35	$715	$815	$1,193	$911	$969	$856
		Associate	39	$419	$621	$863	$641	$614	$557
Employment and Labor: Union Relations and Negotiations / NLRB	201-500 Lawyers	Partner	12	$450	$450	$461	$438	$428	$434
		Associate	13	$264	$320	$360	$310	$265	$285
	501-1,000 Lawyers	Partner	13	$470	$505	$541	$590	$692	$809
Environmental	51-200 Lawyers	Partner	12	$350	$390	$515	$426	$405	$393
Finance and Securities: Debt/Equity Offerings	501-1,000 Lawyers	Partner	40	$944	$1,055	$1,330	$1,099	$1,119	$1,086
		Associate	64	$505	$680	$847	$692	$683	$669
	More Than 1,000 Lawyers	Partner	29	$624	$910	$1,316	$998	$912	$940
		Associate	19	$359	$414	$528	$447	$537	$595
Finance and Securities: Investments and Other Financial Instruments	51-200 Lawyers	Partner	22	$764	$807	$850	$825	$771	$825
		Associate	17	$400	$591	$653	$540	$567	$507
	201-500 Lawyers	Partner	44	$819	$1,027	$1,111	$970	$1,042	$1,016
		Associate	47	$428	$512	$692	$561	$587	$554
	501-1,000 Lawyers	Partner	257	$939	$1,199	$1,460	$1,208	$1,155	$1,134
		Associate	465	$560	$680	$867	$713	$698	$697
	More Than 1,000 Lawyers	Partner	134	$871	$1,075	$1,276	$1,104	$1,057	$1,085
		Associate	106	$466	$615	$743	$608	$662	$695

Section IV: In-Depth Analysis for Select US Cities

New York NY

By Practice Area and Firm Size

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section IV: In-Depth Analysis for Select US Cities

New York NY

By Practice Area and Firm Size

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section IV: In-Depth Analysis for Select US Cities

Philadelphia PA

By Practice Area and Firm Size

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section IV: In-Depth Analysis for Select US Cities

Philadelphia PA

By Practice Area and Firm Size

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section IV: In-Depth Analysis for Select US Cities

Philadelphia PA

By Practice Area and Firm Size

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section IV: In-Depth Analysis for Select US Cities

San Francisco CA

By Practice Area and Firm Size

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section IV: In-Depth Analysis for Select US Cities

Washington DC

By Practice Area and Firm Size

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section IV: In-Depth Analysis for Select US Cities

Washington DC

By Practice Area and Firm Size

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section IV: In-Depth Analysis for Select US Cities

Washington DC

By Practice Area and Firm Size

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section V: International Analysis

Section V: International Analysis

Countries

2019 -- Real Rates for Partners, Associates, and Paralegals | **Trend Analysis (Mean)**

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

Section V: International Analysis

Countries

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

Section V: International Analysis

Countries

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

Section V: International Analysis

Countries

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

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

Section V: International Analysis

Australia

By Role

2019 -- Real Rates for Partners, Associates, and Paralegals					Trend Analysis (Mean)		
Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Partner	154	$375	$484	$588	$498	$516	$536
Associate	221	$234	$302	$409	$325	$342	$339
Paralegal	38	$134	$156	$210	$205	$184	$198

Section V: International Analysis

Australia

By Practice Area and Matter Type

2019 -- Real Rates for Partners, Associates, and Paralegals | **Trend Analysis (Mean)**

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

Section V: International Analysis

Australia

By Industry Group and Matter Type

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section V: International Analysis

Australia

By Firm Size

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section V: International Analysis

Canada

By Role

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

Section V: International Analysis

Canada

By Practice Area and Matter Type

2019 -- Real Rates for Partners, Associates, and Paralegals | **Trend Analysis (Mean)**

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

Section V: International Analysis

Canada

By Practice Area and Matter Type

2019 -- Real Rates for Partners, Associates, and Paralegals | **Trend Analysis (Mean)**

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

Section V: International Analysis

Canada

By Industry Group and Matter Type

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section V: International Analysis

Canada

By Firm Size

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section V: International Analysis

France

By Role

2019 -- Real Rates for Partners, Associates, and Paralegals					Trend Analysis (Mean)		
Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Partner	179	$476	$514	$649	$552	$547	$554
Associate	362	$275	$350	$450	$375	$367	$350
Paralegal	61	$170	$195	$248	$203	$210	$197

Section V: International Analysis

France

By Practice Area and Matter Type

2019 -- Real Rates for Partners, Associates, and Paralegals | **Trend Analysis (Mean)**

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

Section V: International Analysis

France

By Industry Group and Matter Type

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section V: International Analysis

France

By Firm Size

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section V: International Analysis

Germany

By Role

2019 -- Real Rates for Partners, Associates, and Paralegals | **Trend Analysis (Mean)**

Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
Partner	265	$365	$500	$638	$513	$516	$508
Associate	422	$328	$366	$469	$412	$391	$378
Paralegal	80	$167	$204	$234	$218	$211	$196

Section V: International Analysis

Germany

By Practice Area and Matter Type

2019 -- Real Rates for Partners, Associates, and Paralegals | **Trend Analysis (Mean)**

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

Section V: International Analysis

Germany

By Industry Group and Matter Type

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section V: International Analysis

Germany

By Firm Size

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section V: International Analysis

United Kingdom

By Role

2019 -- Real Rates for Partners, Associates, and Paralegals | **Trend Analysis (Mean)**

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

Section V: International Analysis

United Kingdom

By Practice Area and Matter Type

2019 -- Real Rates for Partners, Associates, and Paralegals | **Trend Analysis (Mean)**

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

Section V: International Analysis

United Kingdom

By Practice Area and Matter Type

2019 -- Real Rates for Partners, Associates, and Paralegals | **Trend Analysis (Mean)**

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

Section V: International Analysis

United Kingdom

By Industry Group and Matter Type

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

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

Section V: International Analysis

United Kingdom

By Firm Size

2019 -- Real Rates for Partners and Associates | **Trend Analysis (Mean)**

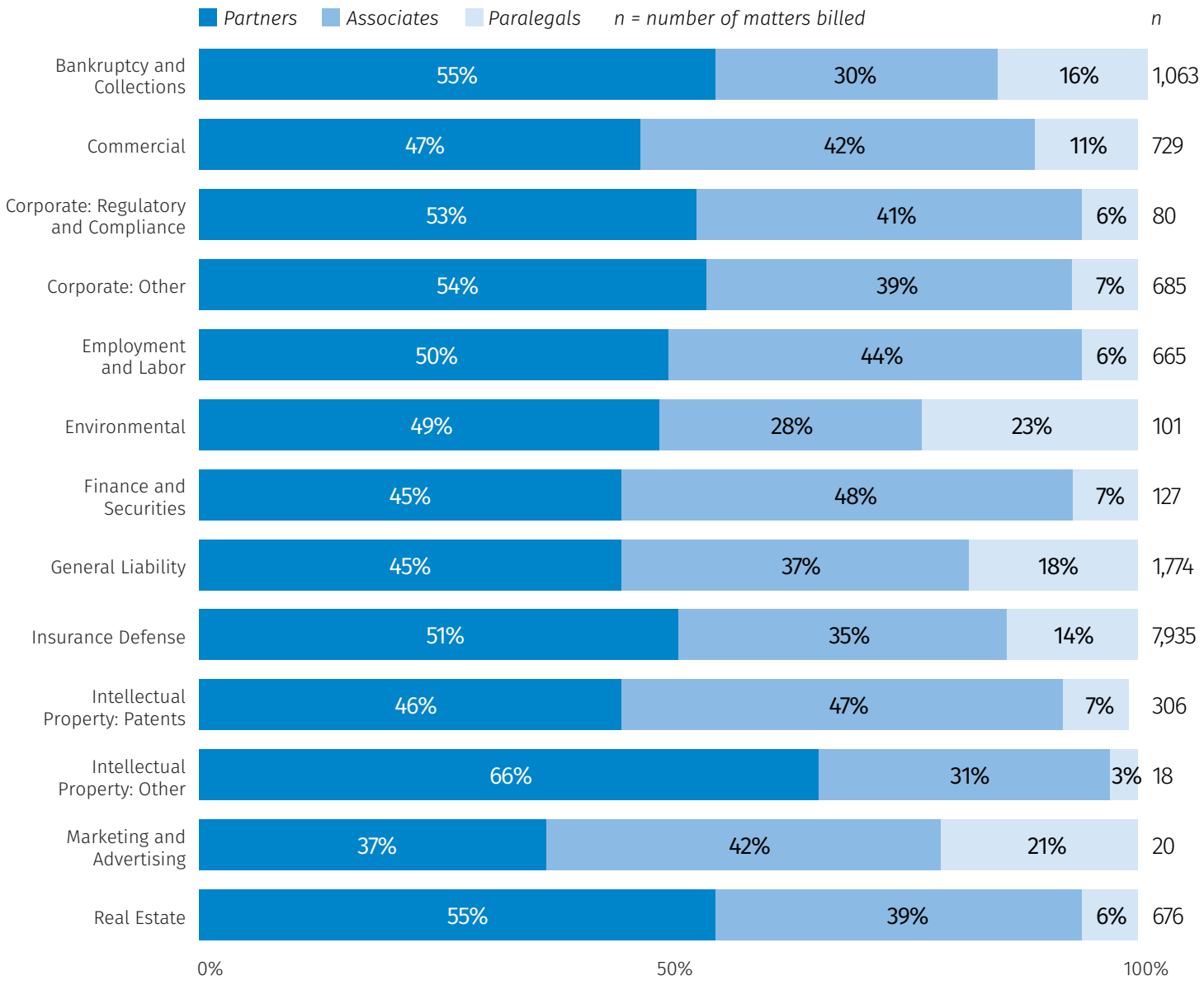
Firm Size	Role	n	First Quartile	Median	Third Quartile	2019	2018	2017
50 Lawyers or Fewer	Partner	15	$610	$626	$667	$602	$529	$449
	Associate	20	$305	$340	$393	$351	$413	$390
51-200 Lawyers	Partner	22	$255	$317	$504	$437	$483	$483
	Associate	25	$268	$309	$393	$347	$373	$351
201-500 Lawyers	Partner	38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

Section VI: Matter Staffing Analysis

Section VI: Matter Staffing Analysis

Short Litgation Matters, 40 to 100 Total Hours Billed

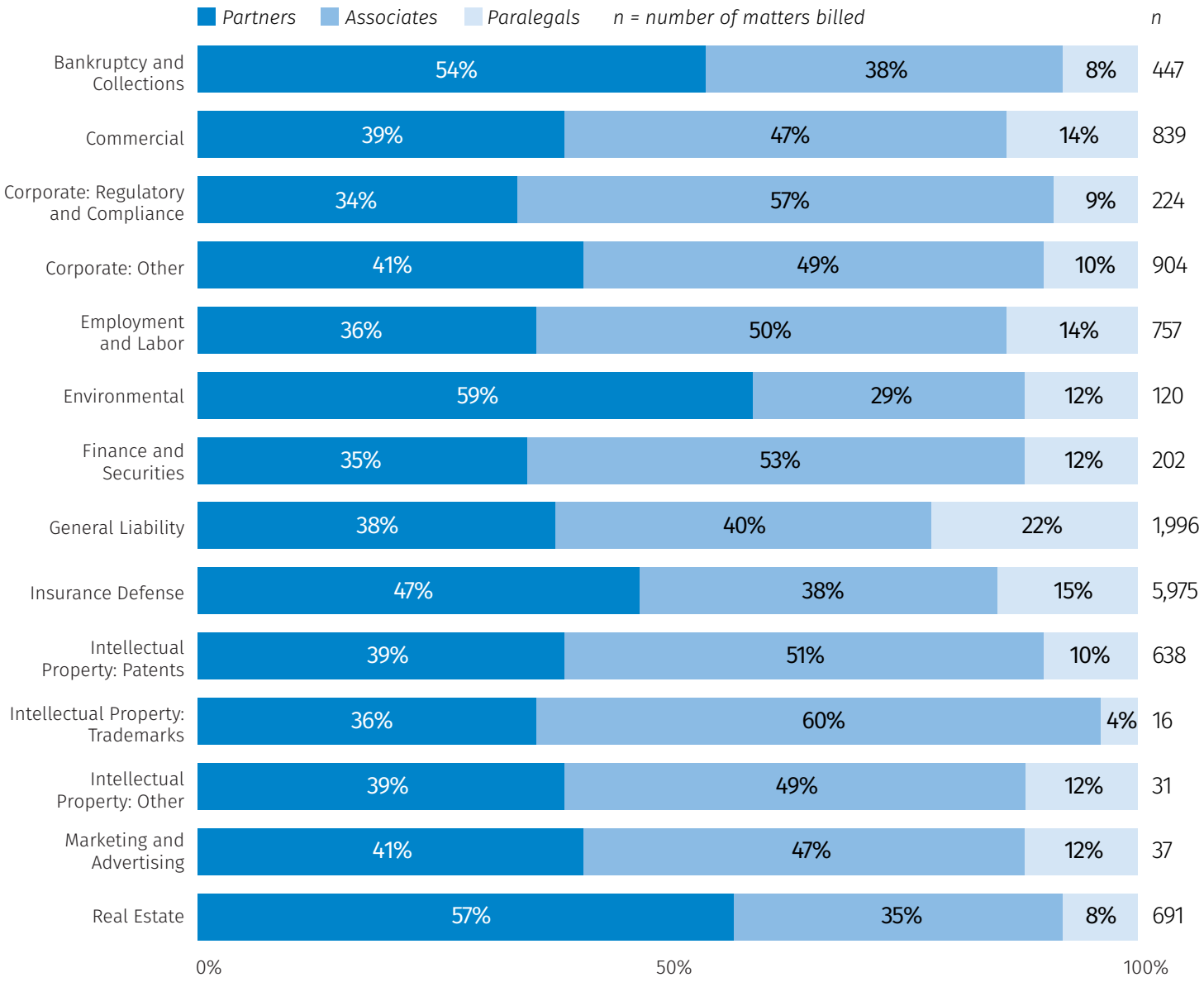
2017 to 2019 -- Percentage of Hours Billed per Matter



Section VI: Matter Staffing Analysis

Long Litgation Matters, More Than 100 Total Hours Billed

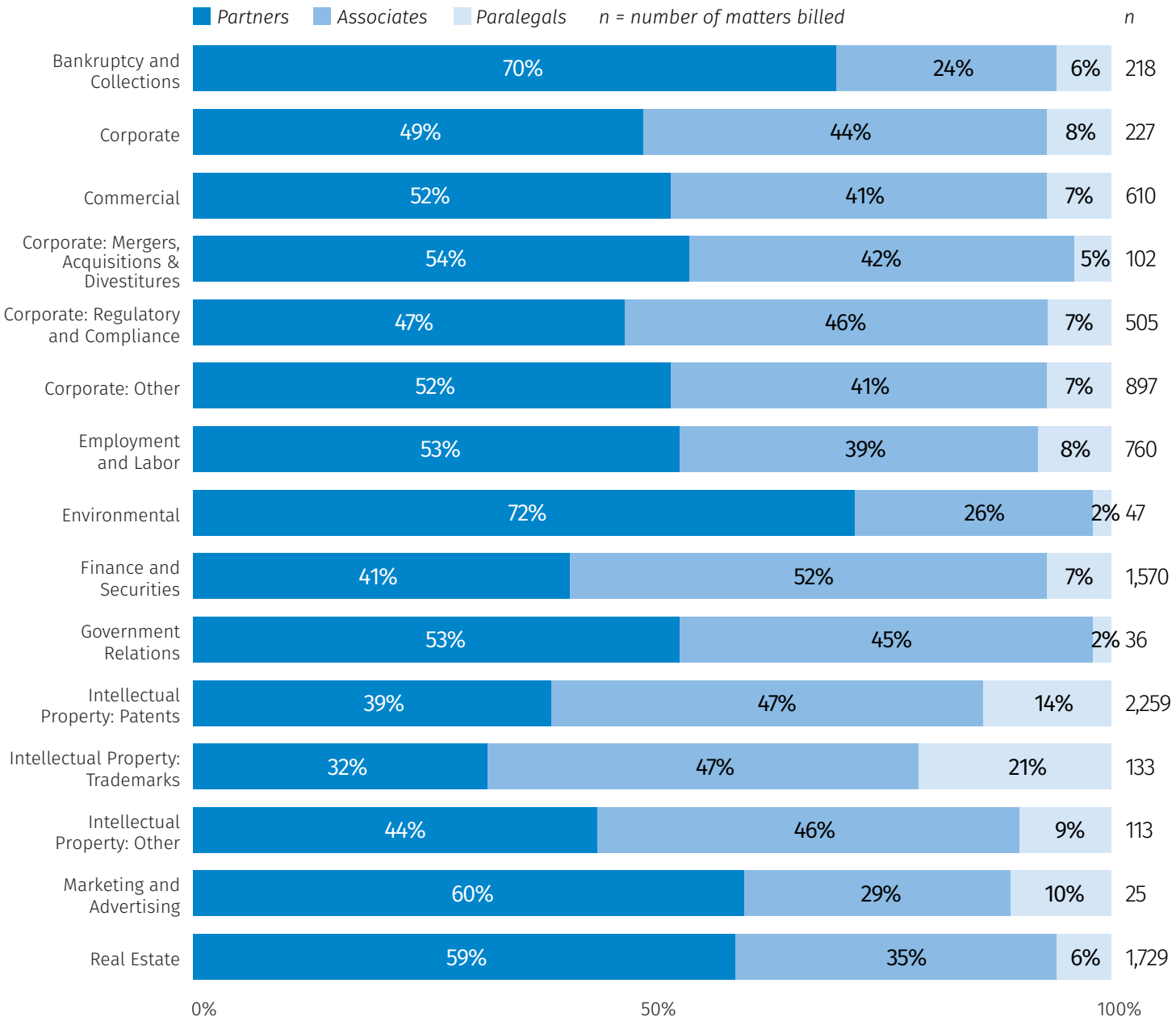
2017 to 2019 -- Percentage of Hours Billed per Matter



Section VI: Matter Staffing Analysis

Short Non-Litgation Matters, 40 to 100 Total Hours Billed

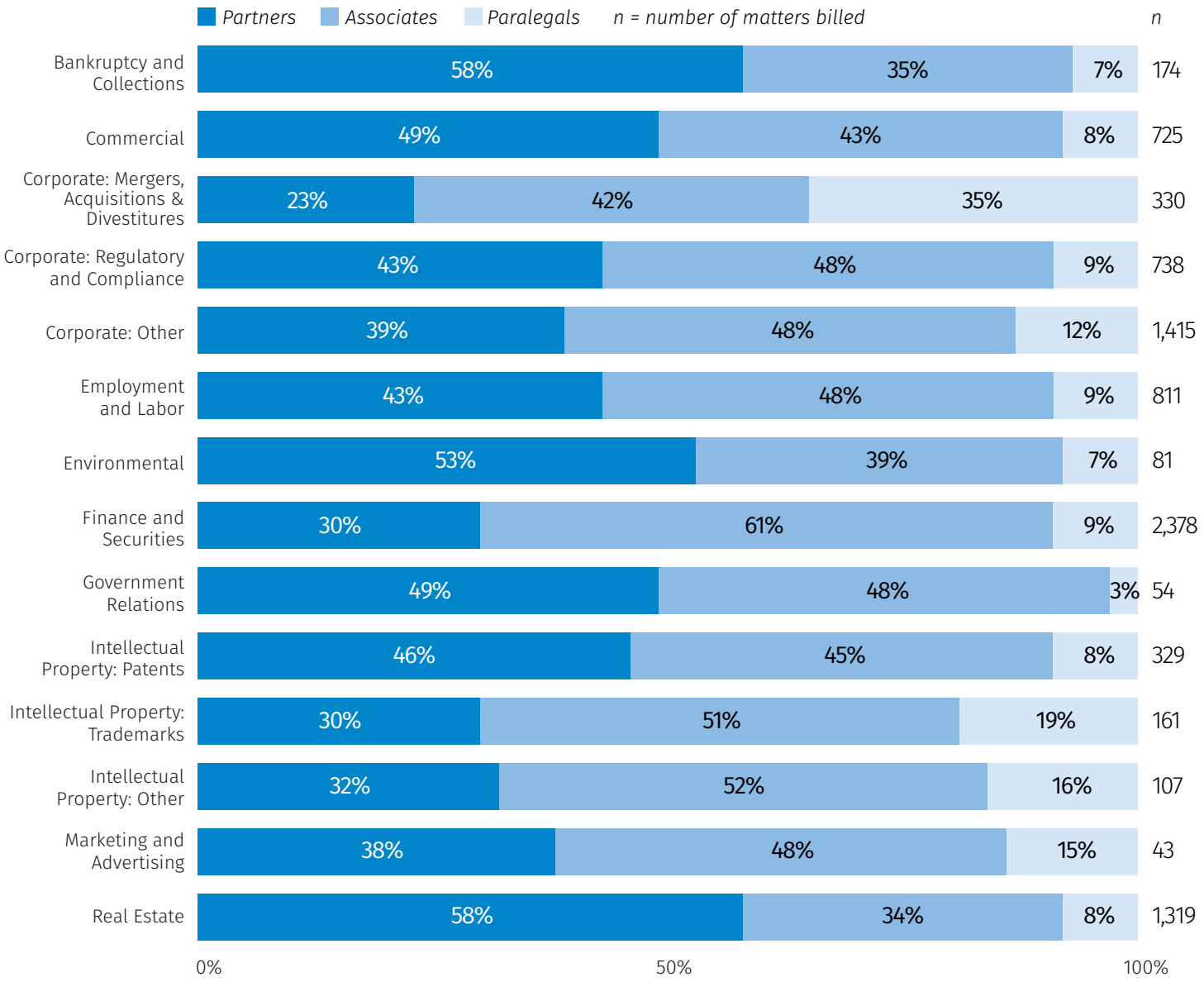
2017 to 2019 -- Percentage of Hours Billed per Matter



Section VI: Matter Staffing Analysis

Long Non-Litgation Matters, More Than 100 Total Hours Billed

2017 to 2019 -- Percentage of Hours Billed per Matter



Appendix:
Data Methodology

2020 Real Rate Report

Appendix: Data Methodology

Invoice Information

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

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

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

Non-Invoice Information

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

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

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

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

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

Appendix: Data Methodology

A Note on US Cities

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

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

Appendix: Data Methodology

A Note on US Cities

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

Appendix: Data Methodology

A Note on US Cities

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

Appendix: Data Methodology

Anonymization of the Dataset

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

To further ensure anonymity and confidentiality:

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

A Note on Insurance Litigation

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

"Real Rate" Definition

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

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

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

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

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

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

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

Appendix: Data Methodology

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

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

A Note on Negotiated Rates and Billing

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

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

Types of Matters Included in the Analysis

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

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

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

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

Bankruptcy and Collections

Chapter 11
Collections
General/Other
Workouts and Restructuring

Appendix: Data Methodology

Commercial (Commercial Transactions and Agreements)

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

Corporate[1]

Antitrust and Competition
Corporate Development
General/Other
Governance
Information and Technology
Mergers, Acquisitions, and Divestitures
Partnerships and Joint Ventures
Regulatory and Compliance
Strategic Asset Management
Tax
Treasury
White Collar/Fraud/Abuse

Employment and Labor

ADA
Agreements
Compensation and Benefits
Discrimination, Retaliation, and Harassment/EEO
Employee Dishonesty/Misconduct
ERISA
General/Other
Immigration
OFCCP
Union Relations and Negotiations/NLRB
Wages, Tips, and Overtime
Wrongful Termination

Environmental

General/Other
Health and Safety
Permits
Superfund
Waste/Remediation

Finance and Securities

Commercial Loans and Financing
Debt/Equity Offerings
Fiduciary Services
General/Other
Investments and Other Financial Instruments
Loans and Financing
SEC Filings and Financial Reporting
Securities and Banking Regulations

General Liability

Asbestos/Mesothelioma
Auto and Transportation
Consumer Related Claims
Crime, Dishonesty and Fraud
General/Other
Personal Injury/Wrongful Death
Premises
Product and Product Liability
Property Damage
Toxic Tort

Government Relations

General/Other
Lobbying and Relations

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

Appendix: Data Methodology

Insurance Defense

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

Intellectual Property[2]

Copyrights
General/Other
Licensing
Patents
Trademarks

Marketing and Advertising

General/Other

Real Estate

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

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

About Wolters Kluwer's ELM Solutions

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

EXHIBIT D

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

MICHAEL MUEHE, ELAINE HAMILTON, CRYSTAL EVANS, and COLLEEN FLANAGAN, on behalf of themselves and all others similarly situated, Plaintiffs, vs. CITY OF BOSTON, a public entity, Defendant.	Case No.: 1:21-cv-11080-RGS

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

I, Linda M. Dardarian, hereby declare:

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

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

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

BACKGROUND AND EXPERIENCE OF GOLDSTEIN, BORGEN, DARDARIAN & HO

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

CASE BACKGROUND

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

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

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

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

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

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

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

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

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

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

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

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

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

REASONABLENESS OF REQUESTED HOURS

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

REASONABLENESS OF REQUESTED RATES

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

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

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

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

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

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

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

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

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

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

[1] *See* United States Bureau of Labor Statistics, CPI Inflation Calculator, bls.gov/data/inflation_calculator.htm.

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

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

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

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

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

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

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

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

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

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

REASONABLENESS OF COSTS AND EXPENSES

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

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

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

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

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

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

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

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

Linda M. Dardarian

Attorneys for Plaintiff and the proposed Settlement Class

EXHIBIT E

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

BRUCE SMITH, PAUL JOSEPH, MARTIN JOSEPH, KIM GADDY, BRIAN KEITH LATSON, MARWAN MOSS, LEIGHTON FACEY, LATEISHA ADAMS, KENNETH SOUSA and WILLIAM WOODLEY, Plaintiffs, v. CITY OF BOSTON, MASSACHUSETTS Defendant.	Civil Action No.: 1:12-10291-WGY

DECLARATION OF HAROLD LICHTEN

Harold Lichten, being duly sworn and deposed, states as follow:

1. I am a member in good standing of the bar of the Commonwealth of Massachusetts. I respectfully submit this declaration in support of Plaintiffs' Assented-to Motion to Final Approval of a Class Action Settlement. The following is based on my personal knowledge, and if called upon to do so, I could and would competently testify thereto.

LLR's Experience in Discrimination and Worker's Rights Lawsuits

2. I am a partner at the law firm of Lichten & Liss-Riordan, P.C. ("LLR") in Boston. Lichten and Liss-Riordan is a Boston-based labor and employment firm, with a focus on wage and hour class actions. A copy of LLR's firm bio is attached hereto as Exhibit A. A number of courts have commented upon the experience of LLR in this area. See, e.g., Scovil v. FedEx Ground Package Sys., Inc., 886 F. Supp. 2d 45, 47 (D. Me. 2012) (""Harold Lichten of the firm of Lichten & Liss–Riordan, P.C. has extensive experience in class action litigation, employment

litigation….").

3. I am a 1977 graduate of New York University School of Law, and I graduated from the University of Pennsylvania in 1974. For the past four decades I have been a labor and employment attorney. Since 2005, I have developed a particular specialty in the field of discrimination against minority police officers and firefighters, including the discriminatory use of written examinations.

4. I have spent much of the past 30 years litigating against discriminatory hiring and promotional practices in Massachusetts police and fire departments. Starting in 1988, I represented a police officer who took the Boston Police lieutenants' examination and, hiring an expert, convinced the Civil Service Commission and the Massachusetts Court of Appeals to hold that a written multiple choice exam, which failed to test for supervisory skills, violates the statutory requirement of the Civil Service Law. See Carr v. Department of Personnel Administration, No. G-1461 (Mass. Civil Serv. Comm'n Dec. 21, 1989) (Lopez Ex. 41, Attachment C); Police Superior Officers Federation v. City of Boston, 35 Mass. App. Ct. 688, 693-94 (1993).

5. It was apparent at that time that a more widespread challenge to the use of written exams by police and fire departments across the Commonwealth would require the removal of consent decrees entered in the 1970s to increase diversity, but which resulted in unconstitutional reverse discrimination. In 2003, I began the work of removing the consent decrees by representing white police officers in a reverse-discrimination case. See Deleo v. City of Bos., Mass., No. CIV.A.03-12538-PBS (D. Mass.). After that, I represented a group of white firefighters in another reverse-discrimination case that led to the First Circuit striking down

Boston's 30-year-old hiring system for fire fighters as discriminatory. Quinn v. City of Boston, 325 F.3d 18 (1st Cir. 2003).

6. Following those rulings, I was able to then represent minorities challenging the use of written entry-level and promotional examinations were discriminatory in violation of Title VII and M.G.L. c. 151B. In 2005, I represented a group of minority firefighters challenging the use of an entry-level written civil service cognitive ability examination used in 2002 and 2004 to qualify and rank applicants. Bradley v. City of Lynn, 443 F. Supp. 2d 145, 148 (D. Mass. 2006).

7. In addition, from 2007 to 2017, I litigated Lopez v. City of Lawrence, et al., Civil Action No. 07–11693 (D.Mass.) on behalf of minority police officers across Massachusetts challenging the use of the 2005 and 2008 police sergeant promotional examination. The Lopez case involved litigation in the District Court, the First Circuit, Massachusetts Superior Court, and the Massachusetts Supreme Judicial Court. More importantly, the Lopez case led to a month-long trial on the issue of whether the sergeant's examination was valid under Title VII and Chapter 151B. The trial involved not only similar issues as those raised in the instant matter, but led to the production of a large amount of the record admitted at trial in the instant matter.

8. In addition to the Lopez lawsuit against the municipalities which proceeded to trial in federal court, I brought similar claims against the Commonwealth's Human Resources Division that were originally included in Lopez, but were removed from federal court by the First Circuit. Lopez v. State, 588 F.3d 69, 72–73 (1st Cir.2009). I then pursued my clients' claims against the Commonwealth in state court, including an appeal to the Supreme Judicial Court, which held that the Commonwealth could be liable for discrimination pursuant to M.G.L. c. 151B. Lopez v. Com., 463 Mass. 696, 698 (2012). Those claims are currently still pending in

state court. See Tatum v. Com., Appeal No. 2019-P-0835 (Mass. App. Ct.) (appeal of dismissal on res judicata grounds currently under advisement).

9. In another similar case, I have spent approximately nine years representing two minority police officers challenging the City of Worcester's discriminatory use of a written sergeants promotional examination in 1992 and 1994. City of Worcester v. Massachusetts Comm'n Against Discrimination, 96 Mass. App. Ct. 1106 (2019) (reversing lower court ruling dismissing case on res judicata grounds based on rulings in Lopez).

10. I have also litigated dozens of other important discrimination cases in Massachusetts including: Gannon v. City of Bos., 476 Mass. 786, 787, 73 N.E.3d 748, 751 (2017) (successfully argued at SJC on behalf of police office with handicap discrimination claim under M.G. L. c. 151B, § 4 (16)); Carleton v. Com., 447 Mass. 791 (2006) (represented hearing impaired individual denied employment as a fire fighter by the city of Marlborough up to the SJC); Gu v. Bos. Police Dep't, 312 F.3d 6 (1st Cir. 2002) (sex discrimination claims); Dahill v. Police Dep't of Bos., 434 Mass. 233, 233, 748 N.E.2d 956, 957 (2001) (argued certified question regarding the definition of the term "handicap" under M.G.L. c. 151B); Cox v. New England Tel. & Tel. Co., 414 Mass. 375, 382, 607 N.E.2d 1035, 1039 (1993) (argued landmark case on application of Massachusetts employment discrimination statute, G.L. c. 151B, in a case in which discrimination on account of handicap is alleged); Quercia v. Allmerica Fin., 84 F. Supp. 2d 222, 224 (D. Mass. 2000) (successfully litigated age discrimination claims); Blacklock v. Com. of Mass., Civil Action No. 90–10150–Z (D. Mass.) (age discrimination).

11. In addition, I have also dedicated my practice to cases involving the misclassification of employees as independent contractors. I currently serve as lead or co-lead

counsel in many labor and employment class and collective action cases in federal courts around the country, including unpaid overtime cases similar to this case.

12. I have successfully litigated numerous landmark cases in the field independent contractor misclassification. For example, in 2005, I became counsel for FedEx drivers in the states of Vermont, Massachusetts and Connecticut in nationwide MDL litigation challenging FedEx Ground's classification of its drivers as independent contractors. I have argued misclassification cases before the Massachusetts Supreme Court, the First Circuit, the Third Circuit, the Seventh Circuit, and the Eleventh Circuit. See, e.g., Schwann v. FedEx Ground Package Sys., Inc., 813 F.3d 429 (1st Cir. 2016) (reversing grant of summary judgment for defendants); Chambers v. RDI Logistics, Inc., 65 N.E.3d 1 (Mass. 2016) (successfully overturning a grant of summary judgment to defendants); Somers v. Converged Access, Inc., 911 N.E.2d 739 (Mass.2009) (landmark decision of the Massachusetts Supreme Judicial Court on independent contractor misclassification); Costello v. BeavEx, Inc., 810 F.3d 1045 (7th Cir. 2016) (earning summary judgment and class certification for class of delivery drivers misclassified as independent contractors); Scantland v. Jeffry Knight, Inc., 721 F.3d 1308 (11th Cir.2013) (reversing grant of summary judgment to Defendants on employment status of cable installers); Hargrove v. Sleepy's, LLC, 220 N.J. 289, 106 A.3d 449 (2015) (arguing landmark case before New Jersey Supreme Court on the employment test applicable under the New Jersey wage laws).

13. In addition, I have successfully represented plaintiffs in many other cases involving delivery drivers who were labeled as independent contractors in both this District Court and across the United States. See, e.g., Vargas v. Spirit Delivery & Distribution Services, Inc., No. 13-12635 (D. Mass. July 24, 2018); Martins v. 3PD, Inc., 2013 WL 1320454, at *1 (D.

Mass. Mar. 28, 2013); Anderson v. Homedeliveryamerica.com, Inc., 2013 WL 6860745 (D. Mass. Dec. 30, 2013); Spates v. Roadrunner Trans. Sys., Inc., No. 15-8723 (N.D. Ill.); Brandon v. 3PD, Inc., No. 13-3745 (N.D. Ill.); Bokanoski v. LePage Bakeries, No. 15-0021 (D. Conn.); Tavares v. S-L Distribution Co., 2016 WL 1743268 (M.D. Pa. May 2, 2016); Ahlquist v. Bimbo Foods Bakeries Distribution, Inc., No. 12-1272 (D. Conn).

14. Based on my advocacy for worker's rights, I was named as one of the Massachusetts Lawyers Weekly "Lawyers of the Year" in both 2003 and 2015. Indeed, my award for 2015 was based on my success in the trial on liability held in this matter. https://www.llrlaw.com/wp-content/uploads/2016/01/Harold-Lawyers-Weekly.pdf.

LLR's Attorneys' Hourly Rates, Hours Spent on this Litigation, and Expenses

15. Along with the work that I performed on this litigation, Benjamin Weber (a former associate at my firm) also performed significant work in this case. He is a 2005 graduate of the University of Iowa School of Law, served as a Massachusetts Assistant Attorney General for four years before joining my firm where he worked in the Fair Labor Division, spent two years representing migrant farmworkers with wage claims with legal services throughout the South, and spent six years representing workers in wage and hour cases at my firm. In October 2018, Weber became Of Counsel at my firm and opened his own solo worker's rights practice (Law Office of Benjamin J. Weber).

16. In addition, Zach Rubin (an associate at my firm) performed significant work in this case. Rubin is a 2012 graduate of Cornell University and a 2015 graduate of Brooklyn Law School. Before coming to my firm in 2018, Rubin worked for a prominent union-side law firm in Connecticut and as in-house counsel at a labor union in Connecticut.

17. Based on my experience with fee awards in litigation across the country and my discussions with co-counsel regarding fee awards in the District of Massachusetts and the First Circuit, I believe the following rates are reasonable based on our firms' experience in the wage and hour field: $700/hr for Partner Harold Lichten, $450/hr for Benjamin Weber, and $350/hr for Zach Rubin, another associate working at my law firm.

Smith Case[1]

Attorney	Hours	Normal Rate	Billable Fees
Harold Lichten	662.9[2]	$700	$464,030
Benjamin Weber	780.6[3]	$450	$351,270
Zach Rubin	195.7	$350	$68,495
TOTALS	**1,635.2**		**$883,795**

18. If anything, this is a conservative estimate of the time logged on this lawsuit. This amount excluded approximately 20 hours logged by other associates at the law firm who worked intermittently on this case. In addition, both myself and associates at my firm often do not log their time on minor tasks.

[1] A true and accurate copy of my firm's logs for myself, Attorney Weber, and Attorney Rubin are attached as Ex. 1.

[2] From February 6, 2012 to May 28, 2015, I logged 388.9 hours on this case. See logs attached as Ex. A. I stopped keeping contemporaneous logs of my time toward the middle of 2015. From May 28, 2015 to the present, which included a failed mediation, briefing before the First Circuit, briefing on reconsideration, and trial on damages, I have spent an additional 274 hours working on this litigation.

[3] Attorney Weber logged 716.6 hours while he was an associate at my firm from May 2013 to January 2018. He logged an additional 60.02 hours working as Of Counsel from April 2019 to the present which is supported by his own logs which are attached as Ex. 2.

19. Based on contemporaneous business records of my law firm, our total expenses incurred in litigating this case have been $346,372.69. See Decl. of Rebecca Nelligan at ¶¶ 4-6 (attached to Plaintiffs' Petition as Ex. C). These fees include a large amount of fees related to experts, including the testimony and reports produced by Plaintiffs' experts Joel Wiesen ($248,395.32) and Leaetta Hough ($75,625.52), and $22,351.85 in other costs, consisting mostly of filing fees, deposition costs, copying and binding fees, and travel expenses. Id. at ¶ 6.

20. In addition, I am seeking fees and costs related to work done in the Lopez case. My firm logged over 3,500 hours on the Lopez case including appeals related to claims against the Commonwealth that are currently pending in Massachusetts state court. The portion of the Lopez case that relates to this case, which included the plaintiffs' claims against the City of Boston and the production of the record that was ultimately admitted in this case represents a smaller portion of those hours. From the filing of the case until the end of the trial before Judge O'Toole, my firm logged over 2,200 hours on the claims related to the City of Boston. For the purposes of this motion, however, I am only seeking compensation for the hours logged by myself, my partner Shannon Liss-Riordan, and Stephen Churchill, which are listed below:

Lopez Case[4]

Attorney	Dates	Hours	2011 Hrly. Rate	Total
Harold Lichten	1/8/2007 to 1/31/2011	728.7	$600	$437,220
Stephen Churchill[5]	1/7/2010 to 1/31/2011	447.9	$500	$223,950
Totals		**1,176.6**		**$661,170**

[4] A true and accurate copy of relevant logs kept by my firm are attached as Ex. 3.

[5] Attorney Liss-Riordan is a partner in my law firm and one of the most well-regarded employment lawyers in the country. She is a 1996 graduate of Harvard Law School and, as discussed in the motion for fees, has frequently been approved at the rate of $800 per hour.

21. In addition, for the trial in Lopez, I incurred expert fees which led to the production of much of the evidence relied on by this Court in Smith, including payments related to the production of two expert reports on the validity of the sergeants promotional examination and related testimony which were admitted into the record of this case and informed the Court's ruling on the lieutenant's promotional examination. These expert fees total $316,781. See Decl. of Rebecca Nelligan at ¶¶ 7-9.

22. Below is a summary of the total fees and costs to which my firm is entitled to in this case

Smith Attorney's Fees	$883,795
Smith Costs	346,372
Lopez Attorney's Fees	$674,620
Lopez Costs	$316,781
Total	**$2,221,568**

I swear under the pains and penalties of perjury that the foregoing is true and accurate.

/s/ Harold Lichten 6/26/2020
Harold L Lichten Date