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Attorneys for Plaintiff,  
11 KARYN MONDO, on behalf of herself  
and all similarly aggrieved employees  
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13 **SUPERIOR COURT OF CALIFORNIA**

14 **COUNTY OF MONTEREY**

15 KARYN MONDO, on behalf of herself  
and all similarly aggrieved employees,

16 Plaintiff,

17 v.

18 THE PAPE' GROUP, INC.; PAPE'  
19 MATERIAL HANDLING, INC.; and DOES  
1 through 50, inclusive,

20 Defendants.  
21

Case No. 20CV001665

**DECLARATION OF LAURA L.  
FRANKLIN IN SUPPORT OF  
PLAINTIFF'S MOTION TO APPROVE  
SETTLEMENT AGREEMENT  
PURSUANT TO THE PRIVATE  
ATTORNEYS GENERAL ACT**

22 Complaint Filed:

June 16, 2020

23 I, Laura L. Franklin, declare as follows:

24 1. I am an attorney duly licensed to practice before all Courts in the State of  
California, and I am with the law firm of Fitzpatrick & Swanston, counsel of record for Plaintiff  
25 Karyn Mondo ("Plaintiff").

26 2. I have worked on this case since its inception through the present. I am familiar  
27 with all aspects of this case and all tasks undertaken by the various members of this firm in  
28

1 litigating this case. I have spent significant time researching and pursuing the claims that have been  
2 alleged in this action. Based on my review of all the information, and based on my experience in  
3 class action litigation, I believe this settlement to be fair, adequate, and reasonable.

4 3. I have been practicing law in California with an emphasis on employment law and  
5 litigation for over 9 years. I received my bachelor's degree with honors from the University of  
6 California, Riverside and my Juris Doctor degree from Monterey College of Law. I was admitted  
7 to the State Bar of California in 2012. Upon graduation, I practiced employment law and litigation  
8 and general civil litigation at Bohnen, Rosenthal & Kreeft in Monterey, California, where I had  
9 been employed in various litigation support staff roles since 2008. While with Bohnen, Rosenthal  
10 & Kreeft, I represented both plaintiffs and defendants in wage and hour class action cases, and I  
11 was a member of a litigation team that obtained a \$12.5 million verdict for the plaintiff following a  
12 5-week jury trial. Following that firm's January 2016 merger with JRG Attorneys at Law  
13 (formerly Lombardo & Gilles), I accepted an associate position at Fenton & Keller in Monterey,  
14 California, where I practiced primarily employer-side employment litigation and counseling for  
15 four years. Since January 2020, I have been an associate at Fitzpatrick & Swanston, during which  
16 time I have handled numerous wage and hour class and individual actions, primarily representing  
17 plaintiffs.

18 I declare under penalty of perjury under the laws of the state of California that the  
19 foregoing is true and correct and if called as a witness I could and would competently testify to  
20 each of the matters stated herein, and that the matters stated herein are based upon my personal  
21 knowledge acquired through first-hand observation, except where the matters stated are opinions or  
22 beliefs, and as to all such opinions and/or beliefs, I do in fact believe them to be true. This  
23 declaration was executed by me on August 2, 2021, in Salinas, California.

24 /s/ Laura L. Franklin

25 Laura L. Franklin  
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