

1 B. James Fitzpatrick (SBN: 129056)
2 Laura L. Franklin (SBN: 282642)
3 FITZPATRICK & SWANSTON
4 555 S. Main Street
5 Salinas, CA 93901
6 Telephone: (831) 755-1311
7 Facsimile: (831) 755-1319

8 Larry W. Lee (SBN: 228175)
9 DIVERSITY LAW GROUP, P.C.
10 515 S. Figueroa Street, Suite 1250
11 Los Angeles, CA 90071
12 Telephone: (213) 488-6555
13 Facsimile: (213) 488-6554

14 Attorneys for Plaintiff,
15 REBECCA PINEDA, as an individual and on behalf of all others similarly situated

16 **SUPERIOR COURT OF CALIFORNIA**

17 **COUNTY OF MONTEREY**

18 REBECCA PINEDA, as an individual and
19 on behalf of all others similarly situated,

20 Plaintiffs,

21 vs.

22 IPPOLITO INTERNATIONAL L.P.; and
23 DOES 1 through 50, inclusive,

24 Defendants.

Case No. 20CV001851

**DECLARATION OF LAURA L.
FRANKLIN IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: November 16, 2021

Time: 9:00 A.M.

Dept.: 13

DECLARATION OF LAURA L. FRANKLIN

I, Laura L. Franklin, declare as follows:

1. I am an attorney at law, duly licensed to practice before all Courts in the State of California, and am with the law firm Fitzpatrick & Swanston, counsel of record for Named Plaintiff Rebecca Pineda ("Plaintiff"). I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. From the inception of the case, Class Counsel has zealously represented the interests of the Class. The Settlement was obtained for the benefit of the Class, as opposed to the individual Class Representative. Further, Class Counsel has been approved as class counsel on a number of prior cases, has litigated numerous other class action cases, and is competent to represent the Class.

3. I do not have any conflict of interest with Plaintiff or any Class Member. I believe the Settlement is fair, reasonable, and in the best interest of the Class.

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

I declare under penalty of perjury under the laws of the state of California that foregoing

1 is true and correct and if called as a witness I could and would competently testify to each of the
2 matters stated herein, and that I based the matters stated herein upon my personal knowledge
3 based on first-hand observation, except where the matters stated is an opinion or belief, and as to
4 all such opinions and/or beliefs, I do in fact believe them to be true. This declaration was
5 executed on October 22, 2021, in Salinas, California.

6
7 /s/ Laura L. Franklin

8 Laura L. Franklin
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28