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Attorneys for Plaintiff,
OFELIA ORTEGA on behalf of herself
and all similarly aggrieved employees

SUPERIOR COURT OF CALIFORNIA

COUNTY OF MONTEREY

OFELIA ORTEGA, on behalf of herself
and all similarly aggrieved employees,

Plaintiff,

v.

SUNLIGHT BERRY FARMS, INC.; and
DOES 1 through 50, inclusive,

Defendants.

Case No. 20CV002558

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

Date: October 28, 2022

Time: 8:30 a.m.

Dept.: 14

Complaint Filed: September 24, 2020

FAC Filed: January 1, 2021

SAC Filed: January 6, 2022

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

2 1. I am an attorney at law, duly licensed to practice before all Courts in the State of
3 California, and am with the law firm Fitzpatrick & Swanston, counsel of record for Plaintiff
4 Ofelia Ortega (“Plaintiff”).

5 2. I am familiar with all aspects of this case and all tasks undertaken by the various
6 members of this firm in litigating this case. I have spent significant time researching and
7 pursuing the claims that have been alleged in this action. I believe this Settlement to be fair,
8 reasonable, and adequate, and in the best interest of the Class Members as a whole.

9 3. I do not have a conflict of interest with Plaintiff or any Class Member.

10 4. I do not have any association with the designated *cy pres* recipient that would
11 present a conflict of interest.

12 5. My qualifications are as follows: I received my bachelor’s degree with honors
13 from the University of California, Riverside and my Juris Doctor degree from Monterey
14 College of Law. I was admitted to the State Bar of California in 2012 and my primary practice
15 has been employment law for the past ten years. Beginning in 2012, I practiced employment
16 litigation and counseling and general civil litigation at Bohnen, Rosenthal & Kreeft in
17 Monterey California, the same firm at which I had been employed in various litigation support
18 staff roles during the preceding four years. As an associate at Bohnen, Rosenthal & Kreeft, I
19 represented both plaintiffs and defendants in wage and hour class action cases, and I was a
20 member of a litigation team that obtained a \$12.5 million verdict for a single plaintiff
21 following a 5-week jury trial. In January 2016, I continued my employment practice at the
22 Salinas-based firm of L+G, LLP (now JRG Attorneys at Law), representing both public and
23 private employers and employees. From July 2016 through January 2020, I practiced primarily
24 employer-side employment litigation and counseling as an associate at Fenton & Keller in
25 Monterey, California. Since January 2020, I have been an associate attorney at Fitzpatrick &
26 Swanston where I practice labor and employment litigation, primarily Plaintiff-side class and
27 representative actions.

1 6. Over the past ten years, I have litigated numerous wage and hour class actions,
2 both as counsel for the plaintiff(s)/class and as defense counsel, and I have been certified as
3 class counsel in numerous wage and hour class actions in California. Currently, I serve as
4 counsel for plaintiff(s)/the class in multiple ongoing wage and hour class actions in Alameda
5 County Superior Court, Monterey County Superior Court, Nevada County Superior Court,
6 Santa Clara Superior Court, San Benito Superior Court, Santa Cruz Superior Court, Ventura
7 County Superior Court, and the United States District Court, Northern District of California,
8 where we will seek class certification by way of a settlement or a class certification motion.

9 I declare under penalty of perjury under the laws of the State of California that the
10 foregoing is true and correct and if called as a witness I could and would competently testify to
11 each of the matters stated herein, and I state that these matters are based upon my own
12 personal knowledge acquired through first-hand observation, except where stated otherwise.
13 This declaration was executed by me on September 2, 2022, in Salinas, California.

14 /s/ Laura L. Franklin

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