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Attorneys for Plaintiff,
KARINA MOSQUEDA, on behalf of herself and all similarly situated employees

SUPERIOR COURT OF CALIFORNIA

COUNTY OF MONTEREY

KARINA MOSQUEDA, on behalf of
herself and all similarly aggrieved
employees,

Plaintiff,

v.

SANSEI GARDENS, INC.; NEW IMAGE
LANDSCAPE COMPANY; and DOES 1
through 50, inclusive,

Defendants.

Case No. 21CV000325

(Assigned to the Hon. Thomas W. Wills, Dept.
15)

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

Date: December 8, 2023

Time: 8:30 A.M.

Dept.: 15

Complaint Filed: February 3, 2021

FAC Filed: September 27, 2022

Trial Date: Not Set

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 I am an associate with the law firm Fitzpatrick & Swanston, counsel of record
4 for Plaintiff Karina Mosqueda (“Plaintiff”).

5 2. Based on Class Counsel’s independent investigations and evaluations, I am of
6 the opinion that the proposed settlement is fair, reasonable, and adequate and is in the best
7 interest of the Class Members as a whole, in light of all known facts and circumstances and the
8 expenses and risks inherent in litigation.

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

25 4. Over the past ten years, I have litigated numerous wage and hour class actions,
26 both as counsel for the plaintiff(s)/class and as defense counsel, and I have been certified as
27 class counsel in numerous wage and hour class actions in California. Currently, I serve as
28 counsel for plaintiff(s)/the class in multiple ongoing wage and hour class actions in Alameda

1 County Superior Court, Monterey County Superior Court, Nevada County Superior Court,
2 Santa Clara Superior Court, San Benito Superior Court, Santa Cruz Superior Court, Ventura
3 County Superior Court, and the United States District Court, Northern District of California,
4 where we will seek class certification by way of a settlement or a class certification motion.

5 5. I do not have any conflicts of interest with the proposed *cy pres* recipient.

6 I declare under penalty of perjury under the laws of the State of California that the
7 foregoing is true and correct and if called as a witness I could and would competently testify to
8 each of the matters stated herein, and I state that these matters are based upon my own
9 personal knowledge acquired through first-hand observation, except where stated otherwise.
10 This declaration was executed by me on November 10, 2023, in Salinas, California.

11 
12 _____
13 Laura L. Franklin