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Attorneys for Plaintiff,
EDWARD GNAT, on behalf of himself and all similarly aggrieved employees

SUPERIOR COURT OF CALIFORNIA

COUNTY OF MONTEREY

EDWARD GNAT, on behalf of himself and
all similarly aggrieved employees,

Plaintiff,

v.

QUINN COMPANY; and DOES 1 through
50, inclusive,

Defendants.

Case No. 20CV003431

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

Date: February 23, 2024
Time: 8:30 a.m.
Dept.: 15

Action Filed: December 21, 2020
Trial Date: Not Set

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

2 1. I am an attorney duly licensed to practice before all courts in the State of
3 California, and I am an associate with the law firm of Fitzpatrick & Swanston, counsel of
4 record for Plaintiff Edward Gnat ("Plaintiff"). I have personal knowledge of the facts set forth
5 below and if called to testify I could and would do so competently.

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

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

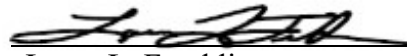
26 4. Over the past eleven years, I have litigated numerous wage and hour class
27 actions, both as counsel for the plaintiff(s)/class and as defense counsel, and I have been
28 certified as class counsel in numerous wage and hour class actions in California. Currently, I

1 serve as counsel for plaintiff(s)/the class in multiple ongoing wage and hour class actions in
2 Alameda County Superior Court, Monterey County Superior Court, Nevada County Superior
3 Court, Santa Clara County Superior Court, San Benito County Superior Court, San Bernardino
4 County Superior Court, Santa Cruz County Superior Court, Ventura County Superior Court,
5 and the United States District Court, Northern District of California, where we will seek class
6 certification by way of a settlement or a class certification motion.

7 5. Counsel do not have any conflicts of interest with proposed *cy pres* recipient.

8 I declare under penalty of perjury under the laws of the State of California that the
9 foregoing is true and correct and if called as a witness I could and would competently testify to
10 each of the matters stated herein, and I state that these matters are based upon my own
11 personal knowledge acquired through first-hand observation, except where stated otherwise.

12 This declaration was executed by me on January 30, 2024, in Salinas, California.

13 
14 Laura L. Franklin