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Attorneys for Plaintiff,
ANGELICA MACIAS, on behalf of herself and all similarly aggrieved employees

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF MONTEREY**

CECILIA ZAMUDIO, on behalf of herself
and all similarly aggrieved employees,

Plaintiff,

v.

CYPRESS HEALTHCARE PARTNERS,
LLC; and DOES 1 through 50, inclusive,

Defendants.

Case No. 20CV003329
[Related Case No. 21CV000056]

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

Date: March 10, 2023

Time: 8:30 a.m.

Dept.: 15

ANGELICA MACIAS, on behalf of herself
and all similarly aggrieved employees,

Plaintiff,

v.

CYPRESS HEALTHCARE PARTNERS,
LLC; and DOES 1 through 50, inclusive,

Defendants.

Complaint Filed: December 11, 2020
FAC Filed: February 23, 2021
Trial Date: Not Set

1 I, Laura L. Franklin, hereby declare and state as follows:

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

6 2. Based on their own independent investigation and evaluation, the Parties and their
7 respective counsel are of the opinion that settlement for the consideration and on the terms set forth
8 in the Joint Stipulation of Class Action Settlement ("Settlement Agreement") is fair, reasonable, and
9 adequate and is in the best interests of the Class and Defendant in light of all known facts and
10 circumstances and the expenses and risks inherent in litigation.

11 3. I have spent significant time researching and pursuing the claims that have been
12 alleged in this action. From the inception of the case, Class Counsel have zealously represented the
13 interests of the Class. Class Counsel have engaged in significant meet and confer discussions with
14 opposing counsel to obtain informal data and documents and to discuss the merits of the claims on
15 behalf of the Class. This settlement was obtained for the benefit of the Class, as opposed to the
16 individual Class Representatives. Based on my review of all the documents and information, and
17 based on my experience in class action litigation, I believe this settlement to be fair, adequate, and
18 reasonable.

19 4. I do not have a relationship with Legal Aid at Work, the proposed *cy pres*
20 beneficiary, nor am I aware of any relationship between Class Counsel and Legal Aid at Work.

21 5. My qualifications are as follows: I received my bachelor's degree with honors from
22 the University of California, Riverside, and my Juris Doctor degree from Monterey College of Law.
23 I was admitted to the State Bar of California in 2012 and my primary practice has been employment
24 law for the past ten years. Beginning in 2012, I practiced employment litigation and counseling and
25 general civil litigation at Bohnen, Rosenthal & Kreeft in Monterey California, the same firm at
26 which I had been employed in various litigation support staff roles during the preceding four years.
27 As an associate at Bohnen, Rosenthal & Kreeft, I represented both plaintiffs and defendants in wage
28 and hour class action cases, and I was a member of a litigation team that obtained a \$12.5 million

verdict for a single plaintiff following a 5-week jury trial. In January 2016, I continued my employment practice at the Salinas-based firm of L+G, LLP (now JRG Attorneys at Law), representing both public and private employers and employees. From July 2016, through January 2020, I practiced primarily employer-side employment litigation and counseling as an associate at Fenton & Keller in Monterey, California. Since January 2020, I have been an associate attorney at Fitzpatrick & Swanston where I practice labor and employment litigation, primarily Plaintiff-side class and representative actions.

6. Over the past ten years, I have litigated numerous wage and hour class and PAGA actions, both as counsel for the plaintiff(s)/class and as defense counsel, and I have been certified as class counsel in numerous wage and hour class actions in California. Currently, I serve as counsel for plaintiff(s)/the class in multiple ongoing wage and hour class and PAGA actions in Alameda County Superior Court, Monterey County Superior Court, Nevada County Superior Court, Santa Clara Superior Court, San Benito Superior Court, Santa Cruz Superior Court, Ventura County Superior Court, and the United States District Court, Northern District of California. Moreover, I have been approved as class counsel in connection with numerous class settlements.

7. My co-counsel and I will adequately represent the Class Members in this action. Class Counsel have and will zealously represent Plaintiffs and the Class and pursue this lawsuit to its conclusion. I have no conflicts with the Class and will adequately represent the Class.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and if called as a witness I could and would competently testify to each of the matters stated herein, and I state that these matters are based upon my own personal knowledge acquired through first-hand observation, except where stated otherwise. This declaration was executed by me on February 15, 2023, in Salinas, California.

/s/ Laura L. Franklin

Laura L. Franklin