

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

Larry W. Lee (SBN: 228175)
DIVERSITY LAW GROUP, P.C.
515 South Figueroa Street, Suite 1250
Los Angeles, California 90071
Telephone: (213) 488-6555
Facsimile (213) 488-6554

Attorneys for Plaintiffs,
MARIA MARAVILLA and JUAN TORRES REYES
on behalf of themselves and all similarly situated employees

SUPERIOR COURT OF CALIFORNIA
COUNTY OF MONTEREY

MARIA MARAVILLA and JUAN TORRES
REYES on behalf of themselves and all similarly
situated employees,

v.

GREENGATE FRESH, LLLP; and DOES 1
through 50, inclusive,

Defendants.

Case No. 21CV001258

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

Date: January 12, 2024
Time: 8:30 a.m.
Dept: 14

Complaint Filed: April 15, 2021
FAC Filed: May 20, 2022
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 California, and I
3 am an associate with the law firm of Fitzpatrick & Swanston, counsel of record for Plaintiffs Maria
4 Maravilla and Juan Torres Reyes (“Plaintiffs”). I have personal knowledge of the facts set forth below
5 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 the opinion
7 that the proposed settlement is fair, reasonable, and adequate and is in the best interest of the Class
8 Members as a whole, in light of all known facts and circumstances and the expenses and risks inherent
9 in litigation.

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

24 4. Over the past eleven years, I have litigated numerous wage and hour class actions, both
25 as counsel for the plaintiff(s)/class and as defense counsel, and I have been certified as class counsel in
26 numerous wage and hour class actions in California. Currently, I serve as counsel for plaintiff(s)/the
27 class in multiple ongoing wage and hour class actions in Alameda County Superior Court, Monterey
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1 County Superior Court, Nevada County Superior Court, Santa Clara Superior Court, San Benito
2 Superior Court, Santa Cruz Superior Court, Ventura County Superior Court, and the United States
3 District Court, Northern District of California, where we will seek class certification by way of a
4 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 foregoing is
7 true and correct and if called as a witness I could and would competently testify to each of the matters
8 stated herein, and I state that these matters are based upon my own personal knowledge acquired
9 through first-hand observation, except where stated otherwise. This declaration was executed by me on
10 November 9, 2023, in Salinas, California.

11 

12 Laura L. Franklin