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10 Attorneys for Plaintiffs,
11 MARIA MARAVILLA and JUAN TORRES REYES
on behalf of themselves and all similarly situated employees
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14 **SUPERIOR COURT OF CALIFORNIA**
15 **COUNTY OF MONTEREY**

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

18 v.

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

21 Defendants.
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23
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Case No. 21CV001258

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

Date: July 26, 2024

Time: 8:30 a.m.

Dept: 14

Action Filed: April 15, 2021

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. I am familiar with all aspects of this case and all tasks undertaken by the various
7 members of this firm in litigating this case.

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

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

26 5. Over the past 12 years, I have litigated numerous wage and hour class actions, both as
27 counsel for the plaintiff(s)/class and as defense counsel, and I have been certified as class counsel in
28

1 numerous wage and hour class actions in California. The firm currently has wage and hour cases in
2 Alameda County Superior Court, Monterey County Superior Court, Nevada County Superior Court,
3 Santa Clara Superior Court, San Benito Superior Court, San Bernardino County Superior Court, San
4 Joaquin County Superior Court, Santa Cruz Superior Court, Ventura County Superior Court, and the
5 United States District Courts for the Eastern and Northern District of California.

6 6. I do not have any conflicts of interest with Plaintiffs or the Class Members.

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

8 I declare under penalty of perjury under the laws of the State of California that the foregoing is
9 true and correct and if called as a witness I could and would competently testify to each of the matters
10 stated herein, and I state that these matters are based upon my own personal knowledge acquired through
11 first-hand observation, except where stated otherwise. This declaration was executed by me on July 3,
12 2024, in Salinas, California.

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14 Laura L. Franklin