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Attorneys for Plaintiffs, the Class and Aggrieved Employees

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

MELISSA HEBDON, on behalf of herself
and all similarly aggrieved employees,

Plaintiff,

v.

MISSION HEALTHCARE SERVICES,
LLC; HEALTHY LIVING NETWORK
RESOURCES, LLC; HEALTHY LIVING
AT HOME - MONTEREY, LLC; and DOES
1 through 50, inclusive,

Defendants.

Case No.: 22CV000226

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

Date: July 1, 2025
Time: 10:00 a.m.
Dept.: 14

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

2 1. I am an attorney duly admitted to practice in the State of California and am the
3 owner of the law firm of Fitzpatrick & Swanston, counsel of record for Plaintiffs Melissa
4 Hebdon and Annette Lewis (collectively "Plaintiffs"). I have personal knowledge of the facts
5 set forth 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 Settlement Class Members as a whole, in light of all known facts and
9 circumstances and the expenses and risks inherent in litigation.

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

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

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

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

7 6. 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
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 June 6, 2025, in Salinas, California.

13 

14 Laura L. Franklin