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Attorneys for Plaintiff,
HEA YON SUZZIE DORN, on behalf of herself and all other similarly situated employees

SUPERIOR COURT OF CALIFORNIA

COUNTY OF MONTEREY

HEA YON SUZZIE DORN, on behalf of
herself and all similarly aggrieved
employees,

Plaintiff,

v.

CENTRAL COAST FEDERAL CREDIT
UNION; and DOES 1 through 50, inclusive,

Defendants.

Case No. 22CV000335

(Assigned to the Honorable Thomas W. Wills,
Dept. 15)

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

Date: March 8, 2024

Time: 8:30 a.m.

Dept.: 15

Complaint Filed: February 3, 2022

Trial Date: Not Set

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

2 1. I am an attorney at law, duly licensed to practice before all Courts in the State of
3 California, and I am an associate with the law firm Fitzpatrick & Swanston, counsel of record
4 for Plaintiff Hea Yon Suzzie Dorn (“Plaintiff”).

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

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

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

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

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

10 This declaration was executed by me on February 9, 2024, in Salinas, California.

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