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17 Attorneys for Plaintiff,
18 JUAN RAMON TORRES REYES on behalf of himself
19 and all similarly aggrieved employees

20 **SUPERIOR COURT OF CALIFORNIA**

21 **COUNTY OF MONTEREY**

22 JUAN RAMON TORRES REYES, on behalf
23 of himself and all similarly aggrieved
24 employees,

25 Plaintiff,

26 v.

27 MB LABOR CONTRACTING, INC.;
28 D'ARRIGO BROS. CO., OF CALIFORNIA;
and DOES 1 through 50, inclusive,

Defendants.

Case No. 22CV000682

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

Date: June 28, 2024

Time: 8:30 A.M.

Dept.: 14

Complaint Filed: March 11, 2022

Trial Date: None Set

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

2 1. I am an attorney duly licensed to practice before all courts in the State of
3 California, and I am an associate at Fitzpatrick & Swanston, counsel of record for Juan Ramon
4 Torres Reyes (“Plaintiff”). I have personal knowledge of the facts set forth below and if called
5 to testify I could and would do so competently.

6 2. Based on their own independent investigation and evaluation, the Parties and
7 their respective counsel are of the opinion that settlement is fair, reasonable, and adequate and
8 is in the best interests of the Class and Defendants MB Labor Contracting, Inc. and D’Arrigo
9 Bros. Co., of California (collectively “Defendants”) in light of all known facts and
10 circumstances and the expenses and risks inherent in litigation.

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

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

1 class counsel in numerous wage and hour class actions in California. The firm currently has
2 wage and hour cases in Alameda County Superior Court, Monterey County Superior Court,
3 Nevada County Superior Court, Santa Clara Superior Court, San Benito Superior Court, San
4 Bernardino County Superior Court, San Joaquin County Superior Court, Santa Cruz Superior
5 Court, Ventura County Superior Court, and the United States District Courts for the Eastern
6 and Northern District of California. Moreover, I have been approved as class counsel in
7 connection with numerous class settlements.

8 5. Plaintiff and Counsel also believe in the fairness of the settlement that is based
9 on factoring in the uncertainty and risks to Plaintiff in not prevailing on one or more of the
10 causes of action or theories alleged in the operative Complaint, the possibility of appeals.

11 6. Plaintiffs and Counsel are adequate representatives in that they have no conflicts
12 with the class and will adequately represent the class.

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

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

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21 Laura L. Franklin
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