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

LORENA RAMIREZ, on behalf of herself
and all similarly aggrieved employees,

Plaintiff,

v.

COVENANT SURGICAL PARTNERS,
INC.; SALINAS ENDOSCOPY CENTER,
LLC; AND DOES 1 through 50, inclusive,

Defendants.

Case No.: 22CV000081

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

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

Date: December 8, 2023
Time: 8:30 a.m.
Dept.: 15

Complaint Filed: January 10, 2022
Trial Date: None

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 for
4 Plaintiffs Lorena Ramirez and Teresa Martinez ("Plaintiff").

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

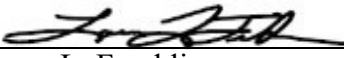
9 3. My qualifications are as follows: I received my bachelor's degree with honors
10 from the University of California, Riverside and my Juris Doctor degree from Monterey College
11 of Law. I was admitted to the State Bar of California in 2012 and my primary practice has been
12 employment law for the past ten years. Beginning in 2012, I practiced employment litigation and
13 counseling and general civil litigation at Bohnen, Rosenthal & Kreeft in Monterey California, the
14 same firm at which I had been employed in various litigation support staff roles during the
15 preceding four years. As an associate at Bohnen, Rosenthal & Kreeft, I represented both
16 plaintiffs and defendants in wage and hour class action cases, and I was a member of a litigation
17 team that obtained a \$12.5 million verdict for a single plaintiff following a 5-week jury trial. In
18 January 2016, I continued my employment practice at the Salinas-based firm of L+G, LLP (now
19 JRG Attorneys at Law), representing both public and private employers and employees. From
20 July 2016 through January 2020, I practiced primarily employer-side employment litigation and
21 counseling as an associate at Fenton & Keller in Monterey, California. Since January 2020, I
22 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 ten years, I have litigated numerous wage and hour class actions,
25 both as counsel for the plaintiff(s)/class and as defense counsel, and I have been certified as class
26 counsel in numerous wage and hour class actions in California. Currently, I serve as counsel for
27 plaintiff(s)/the class in multiple ongoing wage and hour class actions in Alameda County
28

1 Superior Court, Monterey County Superior Court, Nevada County Superior Court, Santa Clara
2 Superior Court, San Benito Superior Court, Santa Cruz Superior Court, Ventura County Superior
3 Court, and the United States District Court, Northern District of California, where we will seek
4 class certification by way of a settlement or a class certification motion.

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

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 personal
9 knowledge acquired through first-hand observation, except where stated otherwise. This
10 declaration was executed by me on November 10, 2023, in Salinas, California.

11
12 
13 _____
14 Laura L. Franklin