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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO

HECTOR J. MEJIA on behalf of himself
and all others similarly situated,

Plaintiffs,

v.

WALMART INC., a Delaware corporation;
and DOES 1 through 10, inclusive,

Defendant.

Case No.: CIVSB-2207614

[Assigned for all purposes to the Hon. David E.
Driscoll, Dept. S26]

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

Date: April 16, 2024
Time: 8:30 a.m.
Dept.: S26

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25 Attorneys for Plaintiffs and the Class
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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 with the law firm of Fitzpatrick & Swanston, counsel of record
4 for Dearl Powell, Christina Gast, and Elijha Gonzalez (“Plaintiffs”). I have personal knowledge
5 of the facts set forth below and if called to testify I could and would do so competently.

6 2. Based on their own independent investigation and evaluation, the Parties and their
7 respective counsel are of the opinion that settlement is fair, reasonable, and adequate and is in the
8 best interests of the Class and Defendants Wal-Mart, Inc., Wal-Mart Associates, Inc. and Wal-
9 Mart Stores, Inc. (collectively, “Defendant”) in light of all known facts and circumstances and
10 the expenses and risks inherent in litigation.

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

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

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

11 6. Plaintiffs and Plaintiffs' counsel are adequate representatives in that they have no
12 conflicts 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 personal
17 knowledge acquired through first-hand observation, except where stated otherwise. This
18 declaration was executed by me on March 21, 2024, in Salinas, California.
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22 _____
23 Laura L. Franklin
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