

B. James Fitzpatrick (SBN: 129056)
Laura L. Franklin (SBN: 282642)
FITZPATRICK & SWANSTON
555 S. Main Street
Salinas, CA 93901
Telephone: (831) 755-1311
Facsimile: (831) 755-1319

Larry W. Lee (SBN: 228175)
Kristen M. Agnew (SBN: 247656)
DIVERSITY LAW GROUP, P.C.
515 South Figueroa Street, Suite 1250
Los Angeles, California 90071
Telephone: (213) 488-6555
Facsimile (213) 488-6554

Andrew H. Swartz (SBN: 58429)
SWARTZ & KENNEDY
215 W Franklin Street, 5th Floor
Monterey, CA 93940-2816
Telephone: (831) 373-3235
Facsimile: (831) 373-8211

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
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: October 11, 2024
Time: 8:30 a.m.
Dept.: 14

1 I, Laura L. Franklin, declare 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 Plaintiffs
4 Melissa Hebdon and Annette Lewis (collectively “Plaintiffs”). I have personal knowledge of
5 the facts set forth below and if called to testify I could and would do so competently.

6 2. Based on my own independent investigation and evaluation, I am of the opinion
7 that settlement is fair, reasonable, and adequate and is in the best interests of the Class in light
8 of all known facts and circumstances and the expenses 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
11 College of Law. I was admitted to the State Bar of California in 2012 and my primary practice
12 has been employment law for the past ten years. Beginning in 2012, I practiced employment
13 litigation and counseling and general civil litigation at Bohnen, Rosenthal & Kreeft in
14 Monterey California, the same firm at which I had been employed in various litigation support
15 staff roles during the preceding four years. As an associate at Bohnen, Rosenthal & Kreeft, I
16 represented both plaintiffs and defendants in wage and hour class action cases, and I was a
17 member of a litigation team that obtained a \$12.5 million verdict for a single plaintiff
18 following a 5-week jury trial. In January 2016, I continued my employment practice at the
19 Salinas-based firm of L+G, LLP (now JRG Attorneys at Law), representing both public and
20 private employers and employees. From July 2016 through January 2020, I practiced primarily
21 employer-side employment litigation and counseling as an associate at Fenton & Keller in
22 Monterey, California. Since January 2020, I have been an associate attorney at Fitzpatrick &
23 Swanston 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. Moreover, I have been approved as class counsel in
5 connection with numerous class settlements.

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

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

11 7. I do not have any conflicts of interest with the proposed *cy pres* recipient,
12 California State Bar's Justice Gap Fund.

13 I declare under penalty of perjury under the laws of the State of California that the
14 foregoing is true and correct and if called as a witness I could and would competently testify to
15 each of the matters stated herein, and I state that these matters are based upon my own
16 personal knowledge acquired through first-hand observation, except where stated otherwise.
17 This declaration was executed by me on September 13, 2024, in Salinas, California.

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20 Laura L. Franklin
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