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Attorneys for Plaintiff,
CURTIS WHITE on behalf of himself, the Class, and all similarly aggrieved employees

SUPERIOR COURT OF CALIFORNIA

COUNTY OF SAN JOAQUIN

CURTIS WHITE on behalf of himself and
all similarly aggrieved employees,

Plaintiff,

v.

CORTECH WEST STAFFING, LLC;
THYSSENKRUPP MATERIALS NA, INC.;
THYSSENKRUPP SUPPLY CHAIN
SERVICES NA INC.; TESLA, INC. dba
TESLA MOTORS, INC.; and DOES 1
through 50, inclusive,

Defendants.

Case No. STK-CV-UOE-2023-0000029

(Assigned to the Hon. Erin Guy Castillo, Dept.
10B)

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

Date: January 14, 2025

Time: 9:00 A.M.

Dept.: 10B

Action Filed: January 3, 2023

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 Curtis
4 White ("Plaintiff"). I have personal knowledge of the facts set forth below and if called to
5 testify I could and would do so competently.

6 2. I am familiar with all aspects of this case and all tasks undertaken by the various
7 members of this firm in litigating this case.

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

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

5. Over the past 12 years, I have litigated numerous wage and hour class actions, both as counsel for the plaintiff(s)/class and as defense counsel, and I have been certified as class counsel in numerous wage and hour class actions in California. The firm currently has wage and hour cases in Alameda County Superior Court, Monterey County Superior Court, Nevada County Superior Court, Santa Clara Superior Court, San Benito Superior Court, San Bernardino County Superior Court, San Joaquin County Superior Court, Santa Cruz Superior Court, Ventura County Superior Court, and the United States District Courts for the Eastern and Northern District of California.

6. I do not have any conflicts of interest with Plaintiff or the Class Members.

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

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and if called as a witness I could and would competently testify to each of the matters stated herein, and I state that these matters are based upon my own personal knowledge acquired through first-hand observation, except where stated otherwise. This declaration was executed by me on December 19, 2024, in Salinas, California.

For Ethel

Laura L. Franklin