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VALERIA BOLANOS and FANNY THORNG

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

VALERIA BOLANOS, as an individual on
behalf of herself and on behalf of all others
similarly situated,

Plaintiff,
vs.

NEWPORT FAB, LLC, a Delaware Limited
Liability Corporation; TOWER
SEMICONDUCTOR NEWPORT BEACH,
INC., a Delaware Corporation; JAZZ
SEMICONDUCTOR TRUSTED FOUNDRY,
INC., a Delaware Corporation; TOWER
SEMICONDUCTOR USA, INC., a California
Corporation; JAZZ SEMICONDUCTOR, INC.,
an unknown entity; and DOES 1 to 100,
inclusive,

Defendants.

Case No. 30-2022-01280696-CU-OE-CXC

*Assigned for all purposes to:
Hon. Layne H. Melzer
Dept. CX-102*

**DECLARATION OF JOHN G. YSLAS IN
SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT,
AND REQUEST FOR ATTORNEYS'
FEES AND COSTS**

Date: June 26, 2025
Time: 2:00 p.m.
Dept.: CX-102

I, John G. Yslas, hereby declare as follows:

1. I am an attorney at law licensed to practice before all of the courts of the State of California. I am a Senior Partner at Wilshire Law Firm, PLC (“WLF”), co-counsel for Plaintiffs Fanny Thorng and Valeria Bolanos (“Plaintiffs”) in this matter. I am thoroughly familiar with and have personal knowledge of all of the facts set forth herein.

2. I submit this declaration in support of Plaintiffs’ Motion for Final Approval of Class Action and PAGA Settlement.

3. Plaintiffs are represented by WLF and Crosner Legal, P.C. The attorneys at WLF performed significant work and expended litigation costs in prosecuting this matter with no guarantee of payment.

4. WLF was selected by Best Lawyers and U.S. News & World Report as one of the nation’s Best Law Firms since 2020 and is comprised of more than 100 attorneys and over 600 employees. WLF is actively and continuously practicing in employment litigation, representing employees in both individual and class actions in both state and federal courts throughout California.

5. WLF is qualified to handle this Litigation because its attorneys are experienced in litigating Labor Code violations in individual, class action, and representative action cases. WLF has handled, and is currently handling, numerous wage and hour class action lawsuits, as well as class actions involving consumer rights and data privacy litigation.

6. I graduated from the University of California, Santa Barbara with High Honors in 1991 with Bachelor of Arts degrees in Psychology. I received my Juris Doctor from UCLA Law School in 1996.

7. Upon graduating from law school in 1996, I worked for a boutique law firm practicing general litigation which included employment law matters. Since 2000 (that is, the last 25 years) my practice has been exclusively focused on labor and employment matters including handling wage and hour class, collective and representative actions (including the California Private Attorneys General Act, or “PAGA”), including in the international law firms of Morgan, Lewis & Bockius LLP (where I was a senior associate), Foley & Lardner LLP (where I was a

1 partner and a national Vice Chair of the Labor and Employment Group), Norton Rose Fulbright
2 LLP (where I was a partner) and Seyfarth Shaw LLP (where I was a partner and member of the
3 Wage and Hour Practice Group). During my time at these law firms, I was the primary attorney or
4 took a major leading role in defending employers on numerous wage and hour class, collective and
5 representative actions.

6 8. In late June 2022 I left Seyfarth Shaw LLP and joined my current firm, Wilshire
7 Law Firm, PLC, to represent plaintiff employees. I have been and am handling many wage and
8 hour class and representative actions litigating such matters on behalf of plaintiff employees in
9 numerous Superior Courts and District Courts. From matters representing both plaintiffs and
10 defendants, I have successfully mediated the resolution of many wage and hour class, collective,
11 and representative actions. Just since starting to settle cases in late April 2023 I have already
12 successfully mediated matters in which I have been counsel or co-counsel resulting in **over**
13 **\$124 million** in settlements, many of which are in the process of being finalized, and with
14 numerous upcoming mediations scheduled. In those and numerous other matters, I have managed
15 and assisted with the litigation and settlement of many wage and hour PAGA and class actions. In
16 those actions, I performed similar tasks as those performed in the course of prosecuting this action.

17 9. I have received numerous awards for my legal work. For example, from 2015 to
18 2018, I was listed in Los Angeles Super Lawyers for Employment Litigation (Thomson Reuters).
19 have also served on numerous prominent boards and in other leadership positions, including
20 currently serving as Southern California Regional President for the Hispanic National Bar
21 Association and on the board of directors of the Mexican American Bar Foundation. I also
22 previously served on the 5-member Los Angeles Civil Service Commission, which generally
23 oversees the personnel decisions for the City of Angeles.

24 10. I have also published numerous blogs on labor and employment issues including on
25 wage and hour issues. For example, I published “Headline News: Wal-Mart v. Dukes-Impact on
26 Class Action Litigation” (while a partner with Foley & Lardner LLP) and “Are You Really
27 Protected From Wage-and-Hour Successor Liability in an Asset Purchase” (while a partner with
28 Seyfarth Shaw LLP). I have also been a presenter at numerous conferences, including being a

1 presenter involving the “Employment Law Update” at a National Employment Law Council
2 conference. My hourly rate while I was working on this case was \$850.00. This hourly rate is
3 reasonable given my years of experience in this practice area and is the usual hourly rate charged
4 for my services.

5 11. Samantha A. Smith is a Senior Attorney at WLF where her practice is focused on
6 managing wage and hour class action and PAGA settlements. Ms. Smith was admitted to the
7 California Bar in December of 2004, and received a J.D. from University of California, Hastings
8 College of the Law and a B.A. from University of California, Davis. Ms. Smith has dedicated her
9 20-year career to plaintiffs’-side class action litigation. Her wealth of experience includes
10 successful work on all stages of class action litigation, including class action appeals, class
11 certification motions, and class settlements. See, e.g., *Blue Diamond Growers Product Labeling*
12 *Cases*, JCCP No. 4822 (Los Angeles County Superior Court) (false advertising of Blue Diamond
13 food products); *Adam vs. eHealth, Inc.*, Case No. 17CV309050 (Santa Clara County Superior
14 Court) (employee data breach); *Overton v. Armour-Eckrich Meats, LLC*, Case No. CIVDS1501325
15 (San Bernardino County Superior Court) (unpaid wages, meal period and rest break claims, and
16 PAGA violations for non-exempt employees); *DeLeon et al. v. Westlake Services, LLC*, Case No.
17 BC 526750 (Los Angeles County Superior Court) (unpaid overtime, meal period and rest break
18 claims for call center employees); *Sawyer v. Retail Data, LLC*, Case No. 30-2014-00753767-CU-
19 OE-CXC (Orange County Superior Court) (unpaid wage and rest break claims for piece rate
20 workers); *Nguyen v. Pharmerica Corporation et al.*, Case No. 30-2014-00716072-CU-OE-CXC
21 (Orange County Superior Court) (unpaid wages and unreimbursed expenses for pharmacists);
22 *Laumea v. Performance Food Group, Inc.*, Case No. CIVDS1407509 (San Bernardino County
23 Superior Court) (unpaid wages, meal and rest break claims for non-exempt employees); *Durroh v.*
24 *East West Bank*, Case No. BC528860 (Los Angeles County Superior Court) (overtime claims for
25 failure to include bonuses in regular rate of pay for bank workers); *Gonzalez et al. v. SFFI*
26 *Company, Inc. et al.*, Case No. CIVDS1504287 (San Bernardino County Superior Court) (unpaid
27 wages, meal period and rest break claims for non-exempt employees). While working on this case,
28 Ms. Smith billed at an hourly rate of \$750.00. This hourly rate is reasonable given Ms. Smith’s

years of experience in this practice area and is the usual hourly rate charged for her services.

12. Jeffrey C. Bils is a Junior Partner at WLF. He graduated from the University of Wisconsin-Madison with a Bachelor of Arts in Journalism and German, and received his Juris Doctor from the University of California, Los Angeles School of Law in 2014. During law school, Mr. Bils was a senior editor on the UCLA Law Review and an articles editor on the entertainment law review. Mr. Bils served as a judicial extern for the Hon. Consuelo Bland Marshall of the United States District Court for the Central District of California, and for the Hon. Sandra R. Klein of the United States Bankruptcy Court for the Central District of California. He graduated 7th in his graduating class in law school and was admitted to practice law in the State of California the same year. Since graduating from law school, Mr. Bils has focused his legal work primarily on employment matters, including wage and hour class and representative action litigation, and has helped obtain dozens of settlements on behalf of employees, as well as on behalf of employers during his years practicing employment defense. He is a member of the Beverly Hills Bar Association, where he is a past member of the Board of Governors and a past Chair of the Labor & Employment Law Section Executive Committee. Mr. Bils is also a member of the California Employment Lawyers Association. While working on this case, Mr. Bils billed at an hourly rate of \$650.00. This hourly rate is reasonable given Mr. Bils' experience in this practice area and is the usual hourly rate charged for his services.

13. Aram Boyadjian is a fifth-year Associate Attorney at WLF. Mr. Boyadjian graduated from the University of California, Los Angeles with a Bachelor of Arts in Political Science. He received his Juris Doctor from Loyola Law School. During law school, he was a member of the student editorial board for the International and Comparative Law Review. Since being admitted to practice law in California in January 2021, his practice has mainly been focused on wage and hour class action litigation. While working on this case, Mr. Boyadjian billed at an hourly rate of \$550.00. This hourly rate is reasonable given Mr. Boyadjian's experience in this practice area and is the usual hourly rate charged for his services.

14. Andrew Sandoval is a third-year Associate Attorney at WLF. Mr. Sandoval graduated from Azusa Pacific University with a Bachelor of Arts in Economics. He received his

Juris Doctor from Loyola Law School. During law school, he was a Vice-President of La Raza de Loyola. Since being admitted to practice law in California in 2022, his practice has mainly been focused on wage and hour class action litigation. While working on this case, Mr. Sandoval billed at an hourly rate of \$450.00. This hourly rate is reasonable given Mr. Sandoval's experience in this practice area and is the usual hourly rate charged for his services

15. WLF's requested fees have been approved by other courts in California. *See, e.g., Matthew Veliz v. DrinkPak, LLC*, Los Angeles County Superior Court, Case No. 22STCV37384, *Ismael Villegas-Sanchez v. COE Orchard Equipment, Inc.*, Sutter County Superior Court Case No. CVCS22-0002261; *Jessica Bronsal v. PTI Technologies Inc.*, Ventura County Superior Court, Case No. 202200570361CUOE; *Miguel A. Vigil Ruiz v. The De Ruosi Group, LLC*, San Joaquin County Superior Court, Case No. STK-CV-UOE-2022-8780; *Gutierrez v. Top Drawer Merch, LLC et al*, Los Angeles County Superior Court, Case No. 23STCV04299; *Wing v. Road Machinery, LLC et al*, Kern County Superior Court, Case No. BCV-22-102896; *Hernandez v. SGPS Showrig Los Angeles, Inc.*, Los Angeles County Superior Court, Case No. 22STCV28155; *Azevedo v. Tulare Nursing & Rehabilitation Hospital, Inc.*, Tulare County Superior Court, Case No. VCU293325; *Haser v. Universal Chain of California, Inc.*, Sacramento County Superior Court, No. 34-2022-00332268; *Caldera v. Performance Online, Inc. et al*, Riverside County Superior Court, No. CVRI2306013; *Goosby v. CiminoCare, Inc.*, Sacramento County Superior Court, No. 34-2022-00329033; *Rooks v. Hot Cakes Restaurant Group, Inc.*, San Joaquin County Superior Court, No. STK-CV-UOE-2022-11056; *Garcia v. Compassionate Heart*, Orange County Superior Court, No. No. 30-2022-01294409-CU-OE-CXC; *Parra v. Citrus Valley Management Services, Inc.*, Riverside County Superior Court, No. CVRI2301768; *Torres v. HomeShield Pest Control Inc.*, Placer County Superior Court, No. S-CV-0049525; *Cabrera v. Creekside Auto Group*, Santa Clara County Superior Court, No. 23CV415661; *Simpson v. Arcos*, Riverside Superior Court, No. CVRI2303337; *Payne v. Planned Parenthood: Shasta-Diablo, Inc.*, San Francisco County Superior Court, No. CGC-23-607359.. The total hours expended on this action are reasonable and in line with comparable cases.

1 16. WLF has performed significant work and incurred litigation costs in prosecuting
2 this matter with no guarantee of any payment. The efforts expended by Class Counsel to achieve
3 this result include, but are not limited to, the following:

- 4 a. the investigation of the matter, including meeting with Plaintiffs, reviewing
5 Defendant's policies, and requesting and reviewing Plaintiffs' time and pay records,
6 personnel files, and exploring the corporate structure of Defendant;
- 7 b. drafting the initial class and PAGA complaints and related documents;
- 8 c. attending status conferences and meeting and conferring with Defendants regarding
9 the case;
- 10 d. meeting and conferring with Defendant regarding mediation, exchange of informal
11 discovery beforehand, and negotiating with co-counsel and opposing counsel
12 regarding the parameters thereof;
- 13 e. selecting a mediator and mediation date;
- 14 f. working with opposing counsel and expert consultants for the receipt of a
15 representative sampling and analyzing the same with the aid of expert consultants
16 and Plaintiffs to perform analyses of liability and exposure prior to attendance of
17 the mediation in this matter;
- 18 g. reviewing policy documents from Defendant and researching applicable defenses;
- 19 h. preparation of a mediation brief and damages model for use at mediation;
- 20 i. attendance at mediation by all Parties and Counsel;
- 21 j. drafting the amended complaint;
- 22 k. communicating with Plaintiffs who requested updates or other information
23 regarding this matter;
- 24 l. negotiating, finalizing and fully executing the initial settlement agreement;
- 25 m. preparing and filing the Motion for Preliminary Approval and supporting
26 documents;
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- 28

- n. negotiating, finalizing and fully executing the amendments to the initial settlement agreement pursuant the Court's request, which are ultimately encompassed within the Settlement Agreement;
- o. preparing the supplemental documents in support of the Motion for Preliminary Approval;
- p. attending the hearings on Motion for Preliminary Approval;
- q. preparing the instant Motion for Final Approval and supporting documents;

17. WLF's current lodestar reflects 373.60 hours of work resulting in \$266,420.00 in fees. The specific tasks performed on the case and the time spent on each task by each attorney is set forth in the time records, a true and correct copy of which is attached hereto as **Exhibit 1**. The time records were kept and created contemporaneously. The chart below shows the calculation of hours spent by each of WLF's attorneys on this case:

Attorney	Hours	Hourly Rate	Total
John G. Yslas	176.3	\$850.00	\$149,855.00
Samantha A. Smith	27	\$750.00	\$20,250.00
Jeffrey C. Bils	82.7	\$650.00	\$53,755.00
Aram Boyadjian	31.4	\$550.00	\$17,270.00
Andrew Sandoval	56.2	\$450.00	\$25,290.00
	373.60		\$266,420.00

18. The risk factors present in this case favor the application of a multiplier. To begin, Class Counsel has assumed the risk and costs of litigation purely on a contingency basis. And, while Plaintiffs are confident in the merits of their claims, a legitimate controversy exists as to each cause of action posing and actual risk that Plaintiffs may not succeed at class certification and/or trial. Any of these obstacles could have prevented recovery completely, meaning Class Counsel would have been left with no compensation for all the time and money invested in litigating this case. Despite these risks, Class Counsel took this case on a contingency basis so that Class members (a particularly vulnerable group of hourly paid workers) could be compensated for

1 their unpaid wages. Consequently, Class Counsel was precluded from focusing on, or taking on,
2 other cases which could have resulted in a larger, and less risky, monetary gain. This time could
3 have been spent on other potentially lucrative cases. This amount also does not include the time
4 Class Counsel will spend at the final approval hearing and assisting the Settlement Administrator
5 following final approval. WLF dedicated significant resources to this case by dividing the tasks
6 required according to skill level, and the hours spent by each attorney are reasonable and not
7 duplicative. WLF's lodestar reflects the efficiencies achieved by attorneys experienced in this field.

8 19. In litigation costs, WLF has spent \$18,468.91 on items such as filing fees, service
9 fees, and expert fees. True and correct copies of WLF's cost report in this matter is attached hereto
10 as **Exhibit 2**. All of the costs incurred were reasonable and necessary for the prosecution of this
11 case.

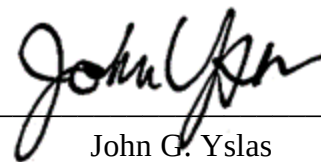
12 20. Class Counsel has negotiated a settlement here that they believe is fair, reasonable,
13 and adequate based on their prior experience litigating these types of cases.

14 21. To date, the LWDA has not responded to or objected to the Settlement in this matter.

15 22. Attached hereto as **Exhibit 3** is a true and correct copy of Plaintiff Fanny Thorng's
16 Declaration in Support of Plaintiffs' Motion for Preliminary Approval submitted on June 12, 2024.

17 I declare under penalty of perjury under the laws of the State of California that the foregoing
18 is true and correct. Executed on May 28, 2025 at Los Angeles, California.

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John G. Yslas

EXHIBIT 1

Attorney	Date	Hours	Description
John Yslas	8/11/2022	4.90	Multiple review of background materisl, lawsuits, law and additional materials in connection with potential class action lawsuit
John Yslas	8/17/2022	5.70	Research re arbitration agreement issues
John Yslas	8/17/2022	3.40	Work on preparing complaint and re correct entities and analysis re related issues
John Yslas	8/25/2022	3.70	Analysis and research related to preparation of facts and mechanics to filing of class and PAGA action complaints
Aram Boyadjian	9/8/2022	0.20	Discuss matter with JY (John Yslas)
Aram Boyadjian	9/8/2022	0.30	Research Defendants; potential earlier filed lawsuits
Aram Boyadjian	9/8/2022	0.20	Review client intake
Aram Boyadjian	9/8/2022	0.30	Review personnel file
Aram Boyadjian	9/8/2022	0.70	Review draft of complaint
Aram Boyadjian	9/8/2022	0.50	Review draft of LWDA letter
Aram Boyadjian	9/9/2022	0.30	Review final drafts of compliants and initiating documents
John Yslas	9/9/2022	0.40	Finalize complaint for filing and submit LWDA notice letter
Aram Boyadjian	9/16/2022	0.10	Review internal email correspondence re service of complaint
Aram Boyadjian	9/21/2022	0.10	Review internal email correspondence re service of complaint
Aram Boyadjian	9/26/2022	0.80	Research re potential arbitration document
Aram Boyadjian	9/29/2022	0.20	Review CMC order
John Yslas	10/7/2022	4.60	Conference with defense counsel re release agreement, research law re same and formulate response argument
Aram Boyadjian	10/8/2022	0.40	Review document sent by OC
Aram Boyadjian	10/8/2022	0.10	Review email from OC
Aram Boyadjian	10/24/2022	0.30	Review email from OC re responsive pleading
John Yslas	10/25/2022	0.90	Analysis re release issues
Aram Boyadjian	10/31/2022	0.20	Review draft stipulation re D responsive pleading deadline
Aram Boyadjian	11/1/2022	0.30	Review email correspondences re joint stip to continue D's responsive pleading deadline

John Yslas	11/4/2022	3.90	Telephone conference with client re case (.4); prepare email re same to client (.2); analysis and evaluation and research regarding public policy issues and approach to take to invalidate agreement (3.3)
Aram Boyadjian	11/7/2022	0.20	Review internal correspondence re contact w client
John Yslas	11/7/2022	1.90	Analysis regarding multiple issues concerning purported general release
Aram Boyadjian	11/9/2022	0.20	Review correspondence from OC for D Newport Fab
Aram Boyadjian	11/10/2022	0.20	Review email correspondences from client
John Yslas	11/10/2022	3.80	Analysis and review re facts and attempt to reach client (.9); telephone conference with defense counsel re release issue and requests (.3); analysis and follow up re related issues and approach (2.6)
Aram Boyadjian	11/11/2022	0.20	Review internal correspondence re contact w client
John Yslas	11/11/2022	3.80	Review and finalize and revise First Amended Complaint and factual review of related issues
Aram Boyadjian	11/13/2022	1.00	Draft PAGA complaint
Aram Boyadjian	11/13/2022	0.20	Internal correspondences re document provided by OC
Aram Boyadjian	11/13/2022	0.30	Review document provided by OC
Aram Boyadjian	11/14/2022	0.30	Discuss matter and document provided by OC w team
John Yslas	11/14/2022	4.20	Analysis re facts and law pertaining to general release issues (1.9); finalize first amended complaint (2.3)
Aram Boyadjian	11/15/2022	0.70	Review first amended complaint for filing
Aram Boyadjian	11/15/2022	0.30	Review emails re document provided by D; potential dismissal
Aram Boyadjian	11/15/2022	0.70	Internal discussion re matter
John Yslas	11/17/2022	3.60	Analysis re facts and issues and prepare response regarding the enforceability of general release of claims
Aram Boyadjian	12/5/2022	0.20	Review email from OC re declaration re employer
John Yslas	12/6/2022	4.90	Analyze and evaluate aspects of defense counsel's latest information re class allegations
Aram Boyadjian	12/7/2022	0.20	Internal discussion re matter; potential joint prosecution agreement
John Yslas	12/7/2022	3.70	Telephone conference with Jamie Serb re cases; research and factual investigation follow up related thereto

John Yslas	12/12/2022	2.80	Analysis and research re release issues and defenses
Aram Boyadjian	12/13/2022	0.30	Review meet and confer letter from OC re potential demurrer; discuss internally
Aram Boyadjian	12/13/2022	0.80	Internal discussion re matter; joint prosecution agreement
Aram Boyadjian	12/13/2022	0.30	Review personnel file
Aram Boyadjian	12/14/2022	0.40	Review letter to OC re potential demurrer; internal discussion
Aram Boyadjian	12/15/2022	0.20	Internal correspondence re potential joint prosecution agreement
John Yslas	12/16/2022	2.90	Evaluate key issues including potential dismissal of certain entities, and consolidation of cases and finalize reply (1.6); evaluate overall case strategy and call with co defense ocounsel (1.3)
Aram Boyadjian	12/20/2022	0.40	Review Declaration of OC re potential demurrer
John Yslas	12/28/2022	1.60	Analysis re arbitration and Viking River issues
John Yslas	1/3/2023	2.60	Analysis pertaining to issues concerning arbitraiton issues
Aram Boyadjian	1/4/2023	0.20	Review emails from OC re tolling agreement
Aram Boyadjian	1/11/2023	0.20	Review D draft joint stipulation and PO re dismissal of class claims
Aram Boyadjian	1/11/2023	0.30	Internal discussion re matter w team
John Yslas	1/13/2023	2.80	Analysis re dismissal issues and consolidation issues (1.9); email communications with co counsel and defense counsel re the same (.9)
Aram Boyadjian	1/16/2023	0.20	Internal discussion re matter; CM report
Aram Boyadjian	1/16/2023	0.80	Draft joint CM report
John Yslas	1/16/2023	3.30	Analysis and preparation of joint statement and evaluate dismissal and prosecution issues
John Yslas	1/16/2023	2.80	Analyze amending LWDA letter and related issues and outline key issues
Aram Boyadjian	1/17/2023	0.20	Internal discussion re PAGA statute of limitations
Aram Boyadjian	1/17/2023	0.20	Internal discussion re D edits to CM report
Aram Boyadjian	1/17/2023	0.30	Review D edits to CM report
Aram Boyadjian	1/18/2023	0.10	Internal correspondence re CM report
Aram Boyadjian	1/18/2023	0.10	Review OC edits to CM report
Aram Boyadjian	1/18/2023	0.20	Finalize CM report for filing
Aram Boyadjian	1/18/2023	0.40	Review D's answer to complaint

John Yslas	1/18/2023	2.80	Analysis and multiple communications with co defense counsel and with defense counsel re joint report and dismissal issues (1.2); analyze same (.4); finalize joint report (.5); strategize re next steps (.7)
John Yslas	1/20/2023	4.40	Analysis related to amending the LWDA letter and finalizing same
Aram Boyadjian	1/23/2023	0.70	Prepare for case management conference
John Yslas	1/23/2023	1.80	Prepare for status hearing including review facts and law and related items
Aram Boyadjian	1/24/2023	0.20	Review internal correspondence re CMC
Aram Boyadjian	1/24/2023	1.10	CMC - prepare / attend
John Yslas	1/24/2023	3.70	Analysis and review of court papers and facts in preparation for status conference (1.7); attend status conference (.4); analysis, communications and work re dismissal documents (1.6)
Aram Boyadjian	2/6/2023	0.20	Email OC re stipulation re dismissal
Aram Boyadjian	2/6/2023	1.10	Draft joint stipulation re dismissal
John Yslas	2/6/2023	2.80	Analysis and revisions to dismissal documents and review draft amended complaint and facts
Aram Boyadjian	2/7/2023	0.20	Review order re CMC
Aram Boyadjian	2/7/2023	0.30	Review OC edits to stipulation
John Yslas	2/8/2023	1.90	Analysis concerning the state of the case and dismissal contemplated and correspondence with defense counsel re same
Aram Boyadjian	2/17/2023	1.20	Draft stipulation re dismissal; associated documents
Aram Boyadjian	2/21/2023	0.20	Finalize joint status conference statement
Aram Boyadjian	2/21/2023	0.50	Draft Joint status conference statement
Aram Boyadjian	2/21/2023	0.30	Stipulation re dismissal
John Yslas	2/21/2023	4.50	Analysis re proposed First Amended Complaint and make suggested revisions and review facts and law re same (1.7); analysis re dismissal issues and revisions to the same to submit (.9); analysis and finalize ISC statement and tend to related issues (.9)
Aram Boyadjian	2/23/2023	0.20	Review court orders re dismissal
Aram Boyadjian	2/23/2023	0.80	Draft first Amended Complaint re PAGA / Class claims
Aram Boyadjian	2/27/2023	0.20	Discuss CMC and request for dismissal w team
Aram Boyadjian	3/1/2023	0.30	Internal discussion re amended complaint
Aram Boyadjian	3/14/2023	0.20	Internal correspondences re mediation
Jeffrey Bils	3/14/2023	1.00	Correspondence with co-counsel re mediation; strategize re mediation

Aram Boyadjian	3/17/2023	0.20	Review emails from co counsel re mediation
John Yslas	3/24/2023	1.10	Analysis related to issues concerning mediation (.9); follow up email to opposing counsel re same and not settling with individual class members or declaration gathering (.2)
Jeffrey Bils	3/28/2023	2.00	Further correspondence with co-counsel re mediation; further strategize re mediation
Jeffrey Bils	4/5/2023	0.40	Review CMC statement; correspondence among counsel re CMC statement
Aram Boyadjian	4/12/2023	0.20	Review CMC statement to be filed in Bolanos class case
Jeffrey Bils	4/12/2023	0.40	Review correspondence to opposing counsel re draft joint statement
Aram Boyadjian	4/13/2023	0.20	Review service copy of joint CMC statement (Bolanos)
John Yslas	4/13/2023	0.90	Analysis related to joint statement and facts and finalizing same
Jeffrey Bils	4/17/2023	6.20	Confer with J. Yslas re stipulation for defendant not to settle with individual class members in advance of mediation; correspondence with opposing counsel re contemplated stipulation; draft stipulation; correspondence with co-counsel re stipulation
John Yslas	4/17/2023	0.90	Analysis re draft statement re discovery issues and mediation and related issues
Jeffrey Bils	4/18/2023	0.40	Review correspondence with co-counsel re continued case management conference
Jeffrey Bils	4/21/2023	0.40	Review correspondence between co-counsel and opposing counsel re stipulation to file first amended complaint
John Yslas	4/21/2023	0.40	Finalize for filing joint stipulation to amend complaint
Aram Boyadjian	4/28/2023	0.20	Review joint statement in related matter
John Yslas	5/24/2023	1.20	Analysis re amended complaint and related issues
Jeffrey Bils	6/13/2023	1.70	Correspondence with opposing counsel re mediation; strategize re mediation
Aram Boyadjian	7/25/2023	0.10	Review internal correspondence re mediation
Jeffrey Bils	7/25/2023	0.30	Correspondence from mediator re mediation
Jeffrey Bils	7/27/2023	0.30	Review invoice re mediation
Andrew Sandoval	9/15/2023	2.50	Premediation discovery requests
Jeffrey Bils	9/15/2023	1.00	Strategize re mediation including pre-mediation informal discovery

Andrew Sandoval	9/18/2023	1.60	Analysis and internal email re mediation
Andrew Sandoval	9/18/2023	0.80	Analysis and email to co-counsel re mediation
Andrew Sandoval	9/18/2023	1.90	Revise premediation discovery requests
Andrew Sandoval	9/18/2023	1.10	Analysis and email to co-counsel re mediation
Andrew Sandoval	9/18/2023	0.90	Analysis and internal email re mediation
Aram Boyadjian	9/18/2023	0.10	Review co counsel email re mediation
Jeffrey Bils	9/18/2023	1.10	Strategize re pre-mediation informal discovery; correspondence among counsel re pre-mediation informal discovery
Andrew Sandoval	9/19/2023	2.20	Analysis and email to opposing counsel re mediation
Aram Boyadjian	9/19/2023	0.10	review co counsel email re mediation; data
John Yslas	9/26/2023	3.70	Analysis of facts and law in preparation for mediation
Aram Boyadjian	9/27/2023	0.10	Review email re mediation confirmation
Jeffrey Bils	9/27/2023	0.30	Correspondence from mediator re mediation
Andrew Sandoval	9/28/2023	4.20	Analysis of mediation data
Aram Boyadjian	9/28/2023	0.30	Review OC email re mediation data; production
Aram Boyadjian	9/28/2023	0.10	Review email re mediation; payment
Jeffrey Bils	9/28/2023	0.80	Strategize re mediation data requests; correspondence with mediator re fees
Andrew Sandoval	9/29/2023	1.40	Analysis and email to opposing counsel re data
Andrew Sandoval	9/29/2023	0.80	Analysis and follow up email to opposing counsel re data
Jeffrey Bils	9/29/2023	0.30	Correspondence with opposing counsel re informal mediation production
Aram Boyadjian	10/3/2023	0.10	Review email from mediation expert re data; analysis
Jeffrey Bils	10/3/2023	0.40	Correspondence from economist re analysis of mediation data
John Yslas	10/13/2023	3.40	Analysis re facts and law in preparatin for mediation
Andrew Sandoval	10/16/2023	2.30	Analysis and call with client re facts
Andrew Sandoval	10/16/2023	3.20	Analysis of facts and law re mediation
John Yslas	10/16/2023	5.70	Analysis of facts, law and outline key issues for mediation
Aram Boyadjian	10/17/2023	0.20	Review internal correspondence re contact w client
Aram Boyadjian	10/17/2023	0.10	Email from co counsel re mediation
Jeffrey Bils	10/17/2023	2.00	Strategize re mediation brief; correspondence with co-counsel re mediation brief
Andrew Sandoval	10/18/2023	1.60	Analysis and internal email re mediation
Andrew Sandoval	10/18/2023	3.80	Analysis of second production of mediation data and records
Andrew Sandoval	10/18/2023	2.10	Analysis and email to expert re data

Aram Boyadjian	10/18/2023	0.10	Review email from co counsel re mediation data; mediation brief
John Yslas	10/18/2023	5.80	Multitple research and analysis related to preparing mediation brief and for mediation
John Yslas	10/18/2023	3.90	Analysis of mediation data, facts, law and next steps and prepare for mediation
Andrew Sandoval	10/19/2023	1.70	Analysis and call with expert re analysis
Andrew Sandoval	10/19/2023	1.20	Analysis and call with opposing counsel
Andrew Sandoval	10/19/2023	2.80	Analysis of CBA issues
Aram Boyadjian	10/19/2023	0.20	Review co counsel emails re mediation
Jeffrey Bils	10/19/2023	1.60	Correspondence with co-counsel re mediation brief and first amended complaint; strategize re mediation; review draft mediation brief
John Yslas	10/19/2023	4.80	Analysis of mediation brief and additions and the expert analysis and key issues
John Yslas	10/19/2023	0.50	Conference with co counsel re the mediation and key issues
Andrew Sandoval	10/20/2023	6.50	Review and revise draft mediation brief
Aram Boyadjian	10/20/2023	0.20	Review co counsel mediation brief
Jeffrey Bils	10/20/2023	1.00	Further review of mediation brief; correspondence with co-counsel and consultant re mediation informal discovery and mediation brief
John Yslas	10/20/2023	6.40	Extensive analysis of facts and law re mediation and make additions to mediation brief
Aram Boyadjian	10/23/2023	0.10	Review email from expert re mediation data; analysis
Andrew Sandoval	10/24/2023	3.20	Analysis and Settlement chart
Jeffrey Bils	10/24/2023	0.30	Strategize re settlement authority
John Yslas	10/24/2023	3.70	Multiple analysis of data, research key CBA issues and prepare for mediation
John Yslas	10/24/2023	5.90	Extensive analysis and review of caselaw, facts, mediation brief and outline key issues for mediaion
Jeffrey Bils	10/25/2023	7.70	Confer with J. Yslas re mediation; evaluate CBA and review applicable law; prepare for mediation including extensive research
John Yslas	10/25/2023	6.90	Continued preparation mediation including analysis of data, outlining arguments and coordinating
Andrew Sandoval	10/26/2023	7.90	mediation
Jeffrey Bils	10/26/2023	10.00	Mediation including preparation and planning next steps
John Yslas	10/26/2023	1.70	Analysis re key regular rate issues for mediation
John Yslas	10/26/2023	7.90	Attend mediation and analysis re next steps

Aram Boyadjian	10/27/2023	0.10	Review internal correspondence re mediation; outcome
John Yslas	10/31/2023	1.10	Analysis re facts and potential additional counteroffers
John Yslas	10/31/2023	2.50	Review potential settlement agreement
Aram Boyadjian	11/1/2023	0.10	Review online docket for CMC
Jeffrey Bils	11/1/2023	0.50	Correspondence with opposing counsel re joint statement; review joint statement
Jeffrey Bils	11/2/2023	0.30	Correspondence with co-counsel re service of joint statement
Andrew Sandoval	11/4/2023	1.10	Analysis of potential settlement
John Yslas	11/4/2023	3.90	Analysis re settlement and mediation and research related to CBA issues
Aram Boyadjian	11/7/2023	0.10	Review court order re continuance of CMC
Jeffrey Bils	11/7/2023	0.40	Strategize re status conference and next steps
Jeffrey Bils	11/20/2023	1.00	Strategize re settlement efforts; correspondence with opposing counsel re answer to complaint
Aram Boyadjian	1/3/2024	0.10	Review email from co counsel re mediation
Aram Boyadjian	1/4/2024	0.10	Review email correspondence from OC
Jeffrey Bils	1/4/2024	0.30	Correspondence with co-counsel re settlement efforts
Aram Boyadjian	1/9/2024	0.10	Review email correspondence from OC
Jeffrey Bils	1/9/2024	0.30	Correspondence with opposing counsel re potential resolution
Aram Boyadjian	1/10/2024	0.10	Review email correspondence from OC
Aram Boyadjian	1/12/2024	0.10	Review email correspondence from OC
Aram Boyadjian	1/16/2024	0.10	Review email correspondence from OC
Aram Boyadjian	1/16/2024	0.10	Review internal correspondence re mediation
Jeffrey Bils	1/16/2024	0.40	Strategize re settlement efforts; correspondence with co-counsel and mediator re settlement efforts
John Yslas	1/16/2024	3.50	Analysis of facts and data and call with mediator and co counsel re settlement issues
Aram Boyadjian	1/17/2024	0.10	Review email from co counsel re mediation
Jeffrey Bils	1/17/2024	0.40	Further strategize re settlement efforts
John Yslas	1/17/2024	1.70	Analysis of facts, review briefs and related issues and then respond to settlement demand
Aram Boyadjian	1/18/2024	0.10	Review internal correspondence re potential resolution
Jeffrey Bils	1/18/2024	0.30	Futher strategize re settlement efforts
John Yslas	1/18/2024	1.60	Additional analysis and settlement communications with mediator

Aram Boyadjian	1/22/2024	0.10	Review internal correspondence re potential resolution
Jeffrey Bils	1/22/2024	0.40	Further strategize re settlement efforts
John Yslas	1/28/2024	1.90	Analysis of facts and follow up re mediation efforts
John Yslas	1/30/2024	1.20	Analysis re settlement evaluation and communicate with mediator
Jeffrey Bils	1/31/2024	0.30	Correspondence with co-counsel re joint report
Aram Boyadjian	2/1/2024	0.10	Review internal correspondence re CMC; attendance
Aram Boyadjian	2/2/2024	0.10	Review internal correspondence re potential resolution
Jeffrey Bils	2/2/2024	0.30	Further strategize re settlement efforts
Aram Boyadjian	2/7/2024	0.10	Internal correspondence re CM report
Aram Boyadjian	2/7/2024	0.40	draft cmc report
Aram Boyadjian	2/7/2024	0.10	Email correspondence w OC re joint report
Jeffrey Bils	2/7/2024	0.40	Strategize re joint report
Aram Boyadjian	2/14/2024	0.10	Review email correspondence re mediator's proposal
Aram Boyadjian	2/14/2024	0.10	Review internal correspondence re CMC; attendance
Aram Boyadjian	2/14/2024	0.10	Review minute order re CMC
Jeffrey Bils	2/14/2024	0.60	Review mediator's proposal and plan next steps
Jeffrey Bils	2/28/2024	0.50	Review costs in matter in furtherance of settlement
Aram Boyadjian	3/1/2024	0.10	Review email correspondence from OC
Jeffrey Bils	3/1/2024	2.10	Review draft settlement agreement; correspondence with opposing counsel re draft settlement agreement; confer with J. Yslas and A. Sandoval re settlement agreement
Aram Boyadjian	3/2/2024	0.10	Review OC email(s) re settlement agreement
Aram Boyadjian	3/4/2024	0.10	Review co counsel email(s) re preliminary approval; settlement
Jeffrey Bils	3/4/2024	0.40	Further review costs in preparation for settlement
Aram Boyadjian	3/5/2024	0.10	Review internal correspondence re settlement
Jeffrey Bils	3/5/2024	1.00	Strategize re approval process
Jeffrey Bils	3/18/2024	1.50	Strategize re settlement and preliminary approval; correponsence with opposing counsel and co-counsel re settlement agreement
Aram Boyadjian	3/19/2024	0.10	Review OC email re preliminary approval; settlement documents
Jeffrey Bils	3/19/2024	1.40	Strategize including with J. Yslas re next steps to effectuate settlement

Jeffrey Bils	3/20/2024	0.50	Correspondence with co-counsel and opposing counsel re settlement agreement and next steps
Jeffrey Bils	3/22/2024	1.00	Strategize re approval motion
Jeffrey Bils	4/2/2024	1.10	Review further revised settlement agreement; correspondence with co-counsel re further revised settlement agreement
Aram Boyadjian	4/3/2024	0.10	Review OC email re settlement agreement; edits
Jeffrey Bils	4/3/2024	0.20	Correspondence with co-counsel re settlement agreement
Aram Boyadjian	4/9/2024	0.10	Review co counsel email re settlement agreement; edits
Aram Boyadjian	4/17/2024	0.10	Review email from OC re class notice (settlement)
Jeffrey Bils	4/17/2024	2.00	Review further revisions to draft settlement agreement and class notice; correspondence with co-counsel re further revisions
Aram Boyadjian	4/18/2024	0.10	Review co counsel email re settlement agreement
Aram Boyadjian	4/18/2024	0.10	Review OC email re settlement documents
Jeffrey Bils	4/18/2024	0.30	Correspondence with co-counsel re approval motion
Jeffrey Bils	4/19/2024	0.40	Correspondence among counsel re approval motion
Jeffrey Bils	4/29/2024	1.20	Correspondence with co-counsel and opposing counsel re settlement agreement and next steps; review settlement agreement documents
Jeffrey Bils	5/2/2024	1.00	Strategize re execution of settlement agreement and next steps
Aram Boyadjian	5/8/2024	0.10	Review email from co counsel re settlement agreement
Jeffrey Bils	5/8/2024	0.30	Strategize with opposing counsel re settlement agreement
Jeffrey Bils	5/8/2024	0.40	Correspondence from opposing counsel with fully executed settlement agreement; strategize re preliminary approval
Aram Boyadjian	5/16/2024	0.10	Review co counsel email re settlement
Jeffrey Bils	5/16/2024	0.40	Correspondence with opposing counsel and co-counsel re preliminary approval motion
Jeffrey Bils	5/18/2024	1.70	Review draft preliminary approval motion and supporting papers; correspondence with co-counsel re draft preliminary approval motion; strategize re preliminary approval motion
Jeffrey Bils	5/20/2024	0.50	Review signed declaration in support of approval; strategize re next steps

Jeffrey Bils	5/21/2024	1.00	Correspondence with co-counsel re preliminary approval motion; review preliminary approval motion and supporting papers
Aram Boyadjian	5/22/2024	0.10	Review co counsel email re preliminary approval motion
Aram Boyadjian	5/23/2024	0.10	Review co counsel email(s) re preliminary approval motion
Aram Boyadjian	5/31/2024	0.10	Review co counsel email re settlement
Aram Boyadjian	5/31/2024	0.10	Review OC email re settlement
Jeffrey Bils	5/31/2024	0.40	Correspondence with opposing counsel and co-counsel re settlement agreement
Aram Boyadjian	6/6/2024	0.10	Review OC email re preliminary approval
Jeffrey Bils	6/10/2024	0.50	Further review preliminary approval papers; correspondence among counsel re preliminary approval papers
Jeffrey Bils	6/12/2024	0.40	Correspondence from co-counsel with service of preliminary approval motion; plan next steps
Jeffrey Bils	6/13/2024	0.30	Plan next steps re preliminary approval
Andrew Sandoval	6/21/2024	1.40	Joint Statement
Jeffrey Bils	6/21/2024	0.50	Correspondence among counsel re joint statement; review joint statement
Aram Boyadjian	6/24/2024	0.10	Review OC email(s) re joint report
Aram Boyadjian	6/24/2024	0.10	Review minute order re preliminary approval hearing
Jeffrey Bils	6/24/2024	0.60	Review minute order re preliminary approval; plan next steps re preliminary approval hearing
Aram Boyadjian	6/25/2024	0.40	CMC - prepare; review order re cmc continuance
Aram Boyadjian	6/25/2024	0.10	Review order re CMC continuance
Aram Boyadjian	7/18/2024	0.10	Review internal correspondence re contact w client
Aram Boyadjian	7/18/2024	0.10	Review internal correspondence re contact w client
Jeffrey Bils	7/18/2024	0.50	Teleconf with Plaintiff re status including preparation
Jeffrey Bils	8/19/2024	0.40	Strategize re settlement documents and approval process
Jeffrey Bils	8/20/2024	0.50	Correspondence with co-counsel re preliminary approval hearing and plan next steps
Jeffrey Bils	8/28/2024	1.00	Strategize re preliminary approval
Aram Boyadjian	9/20/2024	0.20	Review tentative ruling re motion for preliminary approval
Samantha Smith	9/20/2024	1.00	review and analysis of tentative ruling re MPA
Jeffrey Bils	9/20/2024	1.10	Review tentative ruling re preliminary approval motion; correspondence with co-counsel re preliminary approval motion

Jeffrey Bils	9/24/2024	0.50	Strategize re supplemental filing in support of preliminary approval
Jeffrey Bils	9/26/2024	0.40	Strategize re notice requirements and status thereof
Jeffrey Bils	10/9/2024	0.60	Correspondence from co-counsel re supplemental briefing for preliminary approval motion; plan next steps
Samantha Smith	10/15/2024	4.00	damages and valuation analysis of claims per MPA tentative
Samantha Smith	10/16/2024	0.50	telephone call w/co counsel re tentative ruling re MPA
Samantha Smith	10/16/2024	2.50	draft and circulate supplemental declaration re damages
Samantha Smith	10/22/2024	2.50	review and analysis of docs in response to tentative re MPA
Jeffrey Bils	10/22/2024	0.80	Strategize re amended settlement agreement
Samantha Smith	10/23/2024	0.50	finalize amended settlement agreement, get signatures
Samantha Smith	10/24/2024	1.00	meet and confer re edits to supplemental docs
Aram Boyadjian	11/8/2024	0.10	Review OC email re preliminary approval
Samantha Smith	11/8/2024	0.50	receipt and review of tentative granting MPA
Jeffrey Bils	11/8/2024	1.00	Strategize re preliminary approval hearing and next steps for final approval motion
Aram Boyadjian	11/9/2024	0.10	Review tentative ruling re motion for preliminary approval
Jeffrey Bils	11/11/2024	0.30	Strategize re final approval hearing
Samantha Smith	11/18/2024	0.50	reach out to administrator re notice
Jeffrey Bils	11/18/2024	0.40	Correspondence with administrator and among counsel re administration
Jeffrey Bils	11/19/2024	0.30	Stratigize re submission to LWDA
Jeffrey Bils	11/22/2024	0.40	Strategize re JPA
Samantha Smith	12/18/2024	0.50	review emails from admin re notice
Jeffrey Bils	12/30/2024	0.30	Correspondence with administrator re administration
Aram Boyadjian	1/10/2025	0.10	Review email from client
Aram Boyadjian	1/10/2025	0.10	Review internal correspondence re contact w client
Samantha Smith	1/10/2025	0.25	review weekly report from admin
Jeffrey Bils	1/10/2025	0.30	Correspondence with plaintiff re status
Samantha Smith	1/17/2025	0.25	review weekly report from admin
Samantha Smith	1/24/2025	0.25	review weekly report from admin
Samantha Smith	1/31/2025	0.25	review weekly report from admin
Samantha Smith	2/7/2025	0.50	respond to class member re notice
Samantha Smith	2/7/2025	0.25	review weekly report from admin

Samantha Smith	2/14/2025	0.25	review weekly report from admin
Samantha Smith	2/18/2025	0.50	meet and confer re class data
Jeffrey Bils	2/18/2025	0.30	Review notice of reassignment
Samantha Smith	2/21/2025	0.25	review weekly report from admin
Samantha Smith	2/28/2025	0.25	review weekly report from admin
Samantha Smith	3/6/2025	0.50	meet and confer re MFA hearing date
Jeffrey Bils	3/7/2025	0.30	Correspondence with all counsel re stip to continue final approval hearing
Samantha Smith	3/10/2025	0.50	review stip and order re MFA hearing date, approve for signature
Samantha Smith	3/26/2025	0.50	receipt and review of signed order re MFA
Jeffrey Bils	3/26/2025	0.40	Correspondence among counsel re court order re stipulation re new deadlines
Jeffrey Bils	4/18/2025	0.30	Correspondence with co-counsel re next steps in approval process
Jeffrey Bils	4/24/2025	0.30	Correspondence with administrator re administrator's declaration
Jeffrey Bils	5/4/2025	0.50	Correspondence with Plaintiff re case status and next steps
Aram Boyadjian	5/5/2025	0.10	Review email from client
Samantha Smith	5/6/2025	0.50	correspond w/co counsel re MFA
Jeffrey Bils	5/15/2025	0.30	Correspondence from co-counsel with draft approval motion
Jeffrey Bils	5/21/2025	0.60	Strategize re approval motion
Aram Boyadjian	5/22/2025	0.10	Review co counsel email re settlement; approval motion
Samantha Smith	5/22/2025	1.50	review court tentatives re MFA
Jeffrey Bils	5/22/2025	2.00	Further strategize re approval motion
Samantha Smith	5/23/2025	3.00	review/edit draft MFA
Samantha Smith	5/23/2025	4.00	draft declaration in support of MFA and supporting documents
Jeffrey Bils	5/23/2025	1.80	Further strategize re approval motion

TOTAL 373.60

EXHIBIT 2

Wilshire Law Firm, PLC
Client Costs Detailed Report

	All Transactions				
	Type	Date	Source Name	Amount	Balance
Court Filing Fees	Credit Card Charge	09/26/2022	Orange County Superior Court	22.50	22.50
	Credit Card Charge	11/16/2022	One Legal LLC	22.39	44.89
	Credit Card Charge	12/13/2022	Orange County Superior Court	8.97	53.86
	Credit Card Charge	12/13/2022	Orange County Superior Court	22.57	76.43
	Credit Card Charge	01/19/2023	One Legal LLC	179.34	255.77
	Credit Card Charge	02/22/2023	One Legal LLC	24.91	280.68
	Credit Card Charge	02/22/2023	One Legal LLC	44.47	325.15
	Credit Card Charge	02/23/2023	One Legal LLC	44.01	369.16
	Credit Card Charge	02/23/2023	One Legal LLC	45.56	414.72
	Credit Card Charge	02/07/2023	Orange County Superior Court	7.50	422.22
	Credit Card Charge	11/19/2024	Orange County Superior Court	7.50	429.72
	Bill	09/12/2022	Valpro Attorney Services, LLC	1,623.50	2,053.22
	Bill	09/19/2022	Valpro Attorney Services, LLC	45.00	2,098.22
	Bill	09/19/2022	Valpro Attorney Services, LLC	45.00	2,143.22
	Bill	09/22/2022	Valpro Attorney Services, LLC	45.00	2,188.22

Wilshire Law Firm, PLC
Client Costs Detailed Report

	Type	All Transactions Date	Source Name	Amount	Balance
Total · Court Filing Fees	Credit Card Charge	02/07/2024	One Legal LLC	15.39	2,203.61
				<u>2,203.61</u>	<u>2,203.61</u>
	Legal Expenses				
	Credit Card Charge	09/10/2022	Department of Industrial Relations	75.00	75.00
	Bill	07/25/2023	Todd Smith, Esq., APC	4,500.00	4,575.00
				<u>4,575.00</u>	<u>4,575.00</u>
Total · Legal Expenses					
Process Service Fees	Bill	09/16/2022	Valpro Attorney Services, LLC	142.00	142.00
	Bill	09/21/2022	Valpro Attorney Services, LLC	142.00	284.00
	Bill	09/16/2022	Valpro Attorney Services, LLC	142.30	426.30
	Bill	09/16/2022	Valpro Attorney Services, LLC	62.00	488.30
	Bill	09/21/2022	Valpro Attorney Services, LLC	242.00	730.30
				<u>730.30</u>	<u>730.30</u>
Total · Process Service Fees					
Professional Fees	Bill	11/16/2023	Berger Consulting Group, LLC	10,960.00	10,960.00
				<u>10,960.00</u>	<u>10,960.00</u>
	TOTAL COSTS			<u>18,468.91</u>	<u>18,468.91</u>
Total · Professional Fees					

EXHIBIT 3

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Attorneys for Plaintiffs
VALERIA BOLANOS and FANNY THORNG

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ORANGE

VALERIA BOLANOS, as an individual on
behalf of herself and on behalf of all others
similarly situated,

Plaintiff,

vs.

NEWPORT FAB, LLC, a Delaware Limited
Liability Corporation; TOWER
SEMICONDUCTOR NEWPORT BEACH,
INC., a Delaware Corporation; JAZZ
SEMICONDUCTOR TRUSTED FOUNDRY,
INC., a Delaware Corporation; TOWER
SEMICONDUCTOR USA, INC., a California
Corporation; JAZZ SEMICONDUCTOR, INC.,
an unknown entity; and DOES 1 to 100,
inclusive,

Defendants.

Case No.: 30-2022-01280696-CU-OE-CXC

Assigned for all purposes to:
Hon. Lon Hurwitz
Dept. CX103

**PLAINTIFF FANNY THORNG'S
DECLARATION IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

[Filed concurrently with Notice of Motion
and Motion, Memorandum of Points and
Authorities, Declarations of Michael Jones,
John G. Yslas, Valeria Bolanos, and Sean
Hartranft; [Proposed] Order]

Date: , 2024
Time; 9:00 a.m.
Dept. CX-103

1 **DECLARATION OF FANNY THORNG**

2 I, FANNY THORNG, declare as follows:

3 1. I have personal knowledge of the facts set forth in this declaration and could and
4 would competently testify to them under oath if called as a witness.

5 2. I am the proposed class representative in this action and submit this declaration in
6 support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement. I believe I have
7 provided invaluable assistance during the course of this case, and I respectfully hope the Court will
8 approve my request of a \$10,000 service payment for my role as the Class Representative.

9 3. I am a former employee of Defendant Newport Fab, LLC. I worked for Defendant
10 from approximately May 22, 2017 to approximately February 10, 2022 as an hourly-paid, non-
11 exempt employee. Throughout the entirety of my employment, I was subject to Defendant's patterns
12 and practices that have been alleged as unlawful in the Class Action Complaint and Private Attorneys
13 General Action Notice sent to Defendant and the Labor & Workforce Development Agency.

14 4. I have pursued this lawsuit because I was concerned that I was not paid properly for
15 all the hours that I worked, and I was not provided all my meal and rest breaks. While working for
16 Defendant, my coworkers and I were asked to work long hours because of the amount of work,
17 sometimes without taking meal and rest breaks. My meal and rest breaks were often interrupted by
18 supervisors and co-workers asking me to perform work tasks. I frequently performed work tasks
19 while off-the-clock before the start of my shift and after the end of my shift. I also observed my co-
20 workers working long hours without taking breaks. I was not reimbursed for necessary business-
21 related expenses.

22 5. By participating in this lawsuit as a proposed Class Representative, I hoped that I
23 might be able to change Defendant's practices to better protect the working conditions of my co-
24 workers. I also understood it was my duty as the Class Representative to represent the best interests
25 of the class, know about the lawsuit, help my attorneys, and keep updated on the case.

26 6. Prior to commencing this case, I provided Wilshire Law Firm with a detailed account
27 of the facts related to my employment with Defendant. Based on our conversations, my attorneys
28 and I were able to identify instances when I was not paid correctly.

1 7. I have invested a lot of personal time and energy while this lawsuit has been pending.
2 I made it a priority to be actively involved because I wanted to do everything I could to help my
3 attorneys in prosecuting this case. I regularly communicated with my attorneys to discuss updates on
4 the case and to provide information. I communicated with my attorneys via phone calls. Some of
5 these phone calls lasted up to 30 minutes.

6 8. I made myself available during the mediation for this case, and I kept in regular
7 contact with my attorneys before and after the mediation to ensure that any questions the attorneys
8 had could be answered.

9 9. I also reviewed pleadings filed in this case, including the settlement-related
10 documents.

11 10. I believe the settlement is a good settlement, and I would recommend that the Court
12 approve it, because I believe it is fair, adequate, and reasonable. I am glad that I have had the
13 opportunity to represent the Class in this lawsuit, and that I was able to recover money through a
14 settlement for the Class. I have also observed my attorneys' work throughout this case, and I believe
15 they have been thorough, diligent, prompt, courteous, and professional.

16 11. Standing up for myself and the rights of others was not an easy decision, and I am
17 relieved that this is coming to an end. I estimate that I spent at least 45 hours on this case.

18 12. I did not make the decision to file a class action lightly. I was concerned by the
19 attention a publicly filed lawsuit, and especially a class action, would attract. My name would be
20 associated with a lawsuit that I filed against my former employer. I was aware that it is possible to
21 perform background checks of publicly filed documents on the Internet, sometimes with nothing
22 more than a simple Google search. I am mindful that employers might find out that I sued a former
23 employer, and this could hurt my employability.

24 13. I respectfully ask that the Court award me a \$10,000 service payment. I am receiving
25 no additional compensation other than the compensation provided for in the settlement. Based on
26 my involvement in this case and the benefits provided to my former co-workers, I can say I helped
27 stand up for the other workers who may have been too afraid to say anything to management because
28 they did not want to risk losing their jobs or risk the stigma of suing an employer. I was not afraid

1 to take that risk, because I strongly care about helping my current and former co-workers. I also
2 continue to fear that any employer may find out that I participated in this lawsuit and hold it against
3 me. In a competitive job market, this factor may weigh heavily against me. Nevertheless, I felt that
4 important rights were at stake that hurt myself and other employees.

5 I declare under penalty of perjury under the laws of the State of California that the
6 foregoing is true and correct.

7 Executed on the 20th day of May 2024, at Long Beach, California.

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9 DocuSigned by:
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