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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. CX-103

**NOTICE OF MOTION AND MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

[Filed concurrently with Memorandum of Points
and Authorities; Declarations of Michael Jones,
Jeffrey C. Bills, Valeria Bolanos, Fanny Thorng, and
Michael Moore; [Proposed] Order

Date: September 20, 2024
Time: 1:30 p.m.
Dept.: CX-103

1 TO ALL PARTIES AND TO THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that on _____, 2024, at 1:30 p.m., or as soon thereafter as the
3 matter may be heard, in Department CX-103 of the above-captioned Court, located at 751 West
4 Santa Boulevard, Santa Ana, California, plaintiffs Valeria Bolanos and Fanny Thorng will move
5 the Court for preliminary approval of a proposed class action settlement in the above-captioned
6 action under Cal. Rule of Court 3.769. The terms of the settlement are contained within the Joint
7 Stipulation of Class Action Settlement and Release (“Settlement Agreement”), filed concurrently
8 herewith as Exhibit 1 to the Declaration of Michael Jones. In addition, Plaintiffs request that the
9 Court certify the class described in the Settlement Agreement for purposes of settlement only;
10 approve the form of class notice attached as Exhibit A to the Settlement Agreement; approve
11 Crosner Legal P.C. and Wilshire Law Firm, PLC as Class Counsel and plaintiffs Valeria Bolanos
12 and Fanny Thorng as the Class Representatives, approve Phoenix Settlement Administrators as
13 the Settlement Administrator, and set a final approval hearing.

14 This motion will be based on this Notice of Motion and Motion, the accompanying
15 Memorandum of Points and Authorities, the Settlement Agreement, the accompanying
16 Declarations of Michael Jones, John G. Yslas, Valeria Bolanos, Fanny Thorng, and Michael
17 Moore, the Court’s entire file herein, and on such further evidence and argument as may be
18 presented at the hearing.

19
20 Dated: June 11, 2024,

CROSNER LEGAL, P.C.
WILSHIRE LAW FIRM, PLC

21
22 By: _____

23 Zachary M. Crosner
24 Jamie K. Serb
25 Michael Jones
26 John G. Yslas
27 Jeffrey C. Bills
28 Attorneys for Plaintiffs Valeria Bolanos and
Fanny Thorng