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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

**DECLARATION OF VALERIA BOLANOS**

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

1 I, VALERIA BOLANOS, declare as follows:

2 1. I am an adult over the age of eighteen (18) years old. I am a Named Plaintiff who  
3 filed the above-captioned lawsuit. I have personal knowledge of the facts set forth in this  
4 declaration. I make this declaration in support of Plaintiffs' Motion for Preliminary Approval of  
5 Class Action Settlement.

6 2. I was hired by Defendant Newport Fab on July 7, 2020 as an Operator Assistant  
7 and subsequently promoted to a "Photo/Fab Operator" on December 7, 2020. I typically  
8 worked a night shift from 5:30 p.m. to 5:30 a.m. Sometime in 2021 I was injured and went on  
9 medical leave from the company. While working for Newport Fab I don't think I was paid  
10 properly for all of my time, especially for time spent off the clock putting on and taking off  
11 protective gear. Me and the other employees also had to go through a security check to  
12 enter/leave the building and that was done before or after we clocked in or out for the day. I  
13 also don't think I got all of my lunch breaks like I was supposed, and my lunches could be  
14 interrupted by calls from supervisors about work-related issues. These and other class and texts  
15 from supervisors came to my own personal cell phone, and I never received any reimbursement  
16 for using my own phone for company business.

17 3. I decided to bring this lawsuit because I did not feel that I was treated fairly as an  
18 employee of Defendant, especially with regard to not being paid properly for all the hours I  
19 worked, as well missed meal and rest breaks and not getting any expense reimbursement. As a  
20 result, I believe the class members and myself are owed additional compensation for all of the  
21 time we worked that was not paid for by Newport Fab, as compensation for not getting all our  
22 breaks, and to pay for our expenses.

23 4. It is my understanding this lawsuit could not have been prosecuted or settled  
24 unless I or some other employee decided to serve as a named plaintiff and pursue the case. In  
25 deciding to serve as a named plaintiff, I understood that my name would be publicly attached to  
26 this lawsuit and that my work experiences to some extent would be set forth in a public court  
27 file. I recognized that I would need to devote a certain amount of time that I could have spent  
28

1 otherwise. I also recognized that my bringing the lawsuit carried some degree of risk. Despite  
2 this, I decided to serve as the named plaintiff without any promise of recovery or compensation.

3 5. I am familiar with the work involved in prosecuting this case. I have participated  
4 in numerous meetings and communications with my lawyers regarding this case. I am familiar  
5 with the allegations and defenses of the claims in this case. I am familiar with the major events  
6 in this case, including the investigation performed by my lawyers, the mediation with Defendant  
7 that resulted in this settlement, and the preparation of settlement papers and the need to obtain  
8 court approval of the proposed settlement. I participated in all stages of the litigation and  
9 provided my lawyers with information and documents regarding my employment with  
10 Defendant.

11 6. I believe that the proposed settlement obtained on behalf of the other employees  
12 is excellent in view of the issues and risks involved with the case.

13 7. I believe I have fulfilled my duties as a named plaintiff and class representative,  
14 which required a significant amount of time and effort during the course of this case. These  
15 efforts required dedicating numerous hours to lawsuit activities including, but not limited to: (a)  
16 communicating with my attorneys to stay informed of ongoing developments in the case and to  
17 discuss the proposed settlement; (b) searching for and providing documents and other materials  
18 relating to my work experience; (c) responding to requests for information relating to my work  
19 experience; and (d) reviewing filings and key documents including drafts of the complaint and  
20 the settlement agreement. These tasks required my dedication of at least 20 hours of my time,  
21 which time I honestly could have spent on family, personal time, or work. My understanding is  
22 that future tasks may require several more hours of my time. I believe I have been diligent and  
23 that I have acted above and beyond that of which is expected of a named plaintiff to date and  
24 will continue to do so. To the best of my knowledge I have no conflicts of any kind with any  
25 other class member.

26 8. It is my opinion that \$10,000.00 is a fair and adequate award for my service as  
27 the named plaintiff and class representative for the unpaid wage and missed lunch/rest breaks  
28 claims that were brought in the lawsuit. I believe that amount is fair and reasonable in view of

1 the work I have and will continue to perform on behalf of the class members. I believe that my  
2 role in this lawsuit has resulted in a valuable benefit to the other employees, and I accepted the  
3 potential risk of being liable for the opposing parties' costs if we were unsuccessful in this  
4 lawsuit. I believed in this case, so I was willing to be the named plaintiff to risk this and pursue  
5 this class action. I also accepted the risk that news of this lawsuit could also potentially impact  
6 my ability to secure other work.

7 9. Based on the time, service, risk, stress, potential stigma, loss of benefits and  
8 excellent outcome of this case, I believe the enhancement for me is fair and reasonable.

9 I declare under penalty of perjury under the laws of California that the foregoing is true  
10 and correct. Executed on 06 / 11 / 2024, at Long Beach, California.  
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17 Valeria Bolanos  
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