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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. Layne H. Melzer  
Dept. CX-102

**NOTICE OF MOTION AND PLAINTIFFS'  
MOTION FOR FINAL APPROVAL OF  
CLASS ACTION AND PAGA SETTLEMENT,  
AND REQUEST FOR ATTORNEY'S FEES  
AND COSTS**

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

1 TO ALL PARTIES AND TO THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that on June 26, 2025, at 2:00 p.m., or as soon thereafter as the  
3 matter may be heard, in Department CX-102 of the above-captioned Court, located at 751 West  
4 Santa Boulevard, Santa Ana, California 92701, plaintiffs Valeria Bolanos and Fanny Thorng on  
5 behalf of themselves and the conditionally certified settlement class, will and hereby do move the  
6 Court for an order granting final approval of the proposed class action and PAGA settlement,  
7 approving the payment of civil penalties, approving the Class Representative Service Payments  
8 provided for the class action settlement, and approving payment of the Settlement Administrator's  
9 fees and expenses. Plaintiffs also will and hereby do move the Court for an order granting an  
10 award of attorney's fees in the amount of \$1,300,000.00 (one-third (1/3) of the Gross Settlement  
11 Amount) and costs in the amount of \$26,681.90, as provided in the proposed class action  
12 settlement.

13 This motion is brought under California Rule of Court 3.769, on the grounds that the  
14 settlement is fair, reasonable and adequate and in the best interests of the class, and meets all  
15 requirements for class certification. The requested Class Representative Service Payment is fair  
16 and reasonable under the circumstances of the case. The requested attorney's fees and costs are  
17 fair and reasonable under the circumstances of the case.

18 This motion will be based on this Notice of Motion and Motion, the accompanying  
19 Memorandum of Points and Authorities, the Settlement Agreement, the accompanying  
20 Declarations of Sepideh Ardestani, John G. Yslas, Valeria Bolanos and Yami Burns, the Court's  
21 entire file herein, and on such further evidence and argument as may be presented at the hearing.

22 Dated: June 10, 2025

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

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