

THIS IS AN IMPORTANT COURT-APPROVED NOTICE. READ CAREFULLY.

Sanchez v. JSR Micro, Inc., et al.
Santa Clara County Superior Court, Case No. 21CV383516

If you worked as a non-exempt employee in California for JSR Micro, Inc., JSR North America Holdings, Inc. or JSR Life Sciences, LLC at any time from December 18, 2016 through April 22, 2022, a class action lawsuit may affect your rights.

This is a court-authorized notice. It is not a solicitation from a lawyer.

- You have been identified as a Class Member in a lawsuit brought by a former employee against JSR Micro, Inc., JSR North America Holdings, Inc. and JSR Life Sciences, LLC (“Defendants”).
- The Court has preliminarily approved a class action settlement with Defendants, which will affect all non-exempt employees employed by the Defendants in California at any time between December 18, 2016 through April 22, 2022 (the “Class Period”).
- If the Court grants final approval of the Settlement, there will be money available to you.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT	
PARTICIPATE IN THE SETTLEMENT – <u>NO ACTION REQUIRED</u>	Stay in this Lawsuit. Receive a payment. Give up certain rights. By doing nothing, you become part of the Class and will collect a settlement award as detailed below. But you give up certain rights to sue Defendants separately for the legal claims raised in this Lawsuit.
OBJECT TO THE SETTLEMENT	Stay in this Lawsuit. May give up certain rights. If you object to the settlement, you will remain a member of the Class, and if the Court approves the settlement, you will be bound by the terms of the settlement in the same way as Class Members who do not object.
ASK TO BE EXCLUDED	Get out of this Lawsuit. Get no payment from it. Keep rights. If you ask to be excluded from the settlement, you won’t receive any payment from the class settlement award. But you keep any rights to sue Defendants separately for the legal claims raised or that could have been raised in this Lawsuit.

- **Regardless of the option you choose, you will not be retaliated against for exercising your rights.**
- Your options are explained in this notice. To object to the settlement or to ask to be excluded, you must act before December 6, 2022.
- **Any questions?** Read on or contact Class Counsel or the Settlement Administrator listed below.

BASIC INFORMATION

1. Why did I get this notice?

Defendants' records show that you worked for Defendants in California at some point between December 18, 2016 through April 22, 2022 as a non-exempt employee. This notice explains that the Court has given preliminary approval to a settlement in a conditionally certified class action lawsuit that may affect you.

The Court has determined only that there is sufficient evidence to suggest that the proposed settlement might be fair, adequate, and reasonable. Any final determination of those issues will be made at the final hearing. You have legal rights and options that you may exercise as part of this settlement. Judge Patricia Lucas of the Superior Court of the State of California, County of Santa Clara, is overseeing this lawsuit. The lawsuit is known as *Sanchez v. JSR Micro, Inc., et al.*, Case No. 21CV383516.

2. What is this lawsuit about?

This lawsuit is about whether Defendants paid non-exempt employees minimum and overtime wages, provided proper meal periods and rest periods, reimbursed necessary business expenses, paid all wages owed upon termination of employment, and provided proper wage statements as required by applicable California laws, including California's Unfair Competition Laws.

Throughout the litigation, Defendants have denied—and continue to deny—the factual and legal allegations in the case and have maintained that they have valid defenses to the claims. Defendants deny any wrongdoing and assert that their pay practices at all times complied with the law. Defendants further deny that they owe the monies claimed in the lawsuit. However, Defendants have voluntarily agreed to the terms of a negotiated settlement in order to avoid the burden and expense of continued litigation.

3. What is a class action and who is involved?

In a class action lawsuit such as this, a person called the "Class Representative" sues on behalf of other people who may have similar claims. The people together are a "Class" or "Class Members." The person who is the Class Representative is also called the Plaintiff. The company sued is called the Defendant. In class action litigation, one Court resolves the issues for everyone in the Class in one lawsuit, except for those people who choose to exclude themselves from the Class.

This class action also includes a "Private Attorney General Act" (PAGA) claim where the Plaintiff is attempting to recover penalties for the State of California. In a PAGA action, the State receives 75% of the civil penalties, while employees receive 25% of the civil penalties. This settlement will resolve all claims by the State for civil penalties arising from claims made by Plaintiff in the Lawsuit during the period of June 23, 2020 through April 22, 2022 (the "PAGA Period") and aggrieved employees covered by the Lawsuit will be barred from bringing another lawsuit on behalf of the State for such penalties.

4. Why is this Lawsuit a class action?

As part of the settlement, Plaintiff and Defendants agreed to conditionally certify the Class with respect to all of the claims Plaintiff alleged against Defendants as a class action, for settlement purposes only,

and to ask the Court to approve the settlement. The Court has not ruled on the merits of these claims, and the decision to certify the agreed-upon Class for settlement purposes should not be viewed as a prediction or agreement that Plaintiff or the Class would ultimately prevail on the merits of the action.

5. What are the terms of the proposed Settlement?

The major terms of the settlement are as follows:

1. Defendants have agreed to pay \$1,000,000.00 to settle the claims made in this lawsuit. This amount is also known as the “Gross Settlement Amount.”
2. Plaintiff Anthony Sanchez has agreed to release all of his claims in this lawsuit against Defendants.
3. Plaintiff seeks the following deductions from the \$1,000,000.00 Gross Settlement Amount:
 - a. Up to one-third (1/3) of the Gross Settlement Amount (currently equal to \$333,333.33) for Class Counsel’s attorneys’ fees.
 - b. Up to \$30,000.00 for reimbursement of Class Counsel’s litigation costs.
 - c. An incentive award of up to \$10,000.00 to Plaintiff Anthony Sanchez for filing the Lawsuit, performing work in connection with the Lawsuit, and undertaking the risks of filing the Lawsuit.
 - d. Up to \$10,000 to cover the costs of the Settlement Administrator.
 - e. The Parties have agreed to allocate \$50,000 of the Gross Settlement Amount to resolve the claims arising under PAGA. Pursuant to PAGA, 75% of this, or \$37,500.00, will be paid to the California Labor and Workforce Development Agency. The remaining \$12,500 will be paid to PAGA Group Members, as described below.

If the Court approves each of the requested deductions from the Gross Settlement Amount, the Parties estimate there will be approximately \$566,666.67 remaining before deducting for taxes, to be distributed to Settlement Class Members. The remaining funds will be referred to as the “Net Settlement Amount.” Any amounts not requested or awarded by the Court will be included in the Net Settlement Amount. The Net Settlement Amount will be distributed to Class Members who do not request exclusion (the “Settlement Class Members”) on a pro rata basis according to the number of weeks they worked during the Class Period. This is called the “Individual Settlement Amount.”

PAGA Settlement Payments. A portion of the Gross Settlement Amount in the amount of \$12,500 will be set aside for Class Members who worked for Defendants in California at some point between June 23, 2020 through April 22, 2022 (“PAGA Group Members”). If you are a PAGA Group Member, you will receive a pro rata share of the \$12,500, regardless of whether you opt-out of the settlement. This is called the “PAGA Settlement Amount” You will not be able to pursue any claim on behalf of the State for such penalties.

Your estimated Individual Settlement Payment is listed in Section 8 of this Notice. Each Individual Settlement Payment will represent wages and penalties allocated using the following formula: 40% allocated to wages and 60% allocated to penalties and interest. The PAGA Settlement Amount represents 100% penalties. Applicable taxes will be withheld from your payment.

WHO IS IN THE CLASS?

6. Am I part of this Class?

The “Class” includes: All current and former non-exempt employees who are or were employed by Defendants in California at any time between December 18, 2016 through April 22, 2022.

7. I’m still not sure if I am included.

If you still are not sure whether you are included in the Class, you can get free help by contacting CPT Group, the “Settlement Administrator”, at the designated phone number for this matter at 1(888) 846-0373 or by calling or writing the lawyers representing the Class in this case ("Class Counsel"), at the phone number or address listed in Sections 13.

YOUR RIGHTS AND OPTIONS

You have to decide whether to stay in the Class, or ask to be excluded from the settlement. These options are further explained below, including any dates by which you need to take any actions.

8. What is my approximate Individual Settlement Payment?

According to payroll records maintained by Defendants, the total number of weeks you worked in California for Defendants as a non-exempt employee during the Class Period is <<MainClass Workweeks>>. The total number of pay periods you worked during the PAGA Period is <<PAGAClass PayPeriods>>.

Based on information provided above, anticipated court-approved deductions, and preliminary calculations of Qualifying Workweeks and pay periods, it is estimated your share of the settlement will be <<Total estAmount>>, less applicable taxes and withholdings.

You do not need to do anything further to receive your Individual Settlement Payment, other than to ensure that the Settlement Administrator has an accurate mailing address for you. It is important that you contact and inform the Settlement Administrator listed in Section 16, below, of any changes to your mailing address for timely payment.

Settlement Payment checks returned as undeliverable, unclaimed, and/or uncashed 180 days after issuance and delivered checks remaining uncashed for more than 180 days after issuance will be void. The funds from any voided checks will be distributed to the Legal Aid Foundation of Los Angeles.

Disputing Your Payment Amount

If you believe your total weeks worked during the Class Period or pay periods worked during the PAGA Period shown above are not correct, you may contact the Settlement Administrator indicating what you believe is correct. You should also send any documents or other information that supports your belief that the information set forth above is incorrect. The Settlement Administrator will attempt to resolve any dispute based upon Defendants’ records and any information you provide. Any disputes not otherwise resolved by the Settlement Administrator will be resolved by the Court. Any such dispute must be mailed to the Settlement Administrator no later than December 6, 2022.

9. What rights am I releasing if I participate in the Settlement?

If the Court grants final approval of the Settlement and you do not opt out of the Settlement, you will be deemed to have released Defendants from any and all claims that were alleged or reasonably could have been alleged based on the facts in Plaintiff’s operative complaint during the Class Period. These claims include, but are not limited to: (1) failure to pay minimum wages (2) failure to pay overtime wages (3) failure to provide meal periods (4) failure to permit rest breaks (5) failure to reimburse business expenses (6) failure to provide accurate itemized wage statements (7) failure to pay all wages due upon separation of employment; and (8) violation of Business and Professions Code §§ 17200, et seq. (“Released Claims”).

Additionally, if you worked during the PAGA Period, you are a PAGA Group Member and you will also release the right to bring a claim for civil penalties on behalf of the State (and other employees) based on the same facts or theories as the Released Claims, which arose during the PAGA Period, even if you have formally opted-out of being a Settlement Class Member.

10. How do I object to the Settlement?

You may object to the proposed settlement in writing. All written objections, supporting papers and/or notices of intent to appear at the Final Approval Hearing must (a) clearly identify the case name and number (*Sanchez v. JSR Micro, Inc., et al.*, Case Number 21CV383516), (b) be submitted to the Court either by mailing the objection to: Clerk of the Court, Superior Court of California, County of Santa Clara, 191 N. 1st Street, San Jose, California 95113 or by contacting the court by email (complex@scscourt.org) or telephone (408-882-2286); (c) also be mailed to the Settlement Administrator and (d) be filed or postmarked on or before December 6, 2022.

You may also appear at the Final Approval Hearing to make an oral objection remotely whether or not any notice of appearance has been provided. Further instructions to appear remotely can be found in Section 17 below.

11. Why would I ask to be excluded?

You have the right to exclude yourself from the Class (and the settlement). If you exclude yourself from the Class—sometimes called "opting-out" of the Class – you will not get any money or benefits from the settlement. However, you may then be able to sue or continue to sue Defendants for your own claims if permitted by law. If you exclude yourself, you will not be legally bound by the Court's disposition of

this lawsuit. If you exclude yourself, you should talk to your own lawyer soon, because your claims may be subject to a statute of limitations (thus, claims may expire in a short period of time).

12. How do I ask to be excluded from the Class?

If you are a member of the Class described above and would like to exclude yourself from the Class (“opt-out”), you, or your authorized representative, need to submit a written statement requesting exclusion from the Class and mail it to the Settlement Administrator at the address in Section 16 below. The statement must be signed by you or your authorized representative and must be postmarked on or before December 6, 2022. The date of the postmark on the mailing envelope shall be the exclusive means used to determine whether a Request for Exclusion has been timely submitted. Any Class Member who requests to be excluded from the Class will not be entitled to any recovery under the settlement and will not be bound by the settlement or have any right to object, appeal, or comment thereon. Class Members who fail to submit a valid and timely request for exclusion on or before December 6, 2022 will be bound by all terms of the settlement and any final disposition entered in this Class Action if the Settlement is approved by the Court. However, Class Members cannot opt out of releasing PAGA claims, as those claims technically belong to the State of California and Plaintiff has agreed to release those claims acting as a proxy for the State. This means that even if a Class Member opts-out from the settlement, they will still be paid their allocation of the PAGA Settlement Amount, if any, and will remain bound by the release of the PAGA Released Claims regardless of their request to opt out.

THE LAWYERS REPRESENTING YOU

13. Do I have a lawyer in this case?

Lawyers for the Class

Samuel A. Wong
Kashif Haque
Jessica L. Campbell
Kristy R. Connolly
AEGIS LAW FIRM, PC
9811 Irvine Center Drive, Suite 100
Irvine, CA 92618
Tel: 949-379-6250
Kconnolly@aegislawfirm.com

The Court decided that Aegis Law Firm, PC is qualified to represent you and all Class Members. The law firm is called "Class Counsel" in the context of this case. More information about this law firm, their practice, and their lawyers' experience is available at www.aegislawfirm.com.

14. How will the lawyers be paid?

As part of the Settlement with Defendants, Class Counsel has requested one-third of the Gross Settlement Amount (currently equal to \$333,333.33) in attorneys' fees, plus costs not to exceed \$30,000, to be paid from the Gross Settlement Amount to compensate Class Counsel for their work on this matter. You will not have to pay Class Counsel's fees and costs from your Individual Settlement Payment.

15. How will the Plaintiff be paid?

As part of the Settlement with Defendants, Class Counsel has requested an incentive award of up to \$10,000.00 to be paid to Plaintiff Anthony Sanchez for his effort in this matter during initial investigation, discovery, mediation and the like, while serving as Class Representative and taking on the burden and risks of litigation.

THE SETTLEMENT, APPROVAL, AND PAYMENT PROCESS**16. Who is handling the Settlement Administration process?**

Anthony Sanchez v. JSR Micro, Inc. Settlement Administrator
c/o CPT Group Inc.
50 Corporate Park
Irvine, CA 92606
Telephone: 1(888) 846-0373
Fax: 949-419-3446

17. When is the Final Fairness and Approval Hearing and do I have to attend?

The Final Fairness and Approval Hearing has been set for January 18, 2023, at 1:30 p.m. in Department 3 of the Santa Clara County Superior Court for the State of California, located at 191 N. 1st Street, San Jose, California 52113. You do not need to attend the hearing to be a part of the Settlement. However, if you wish to object to the Settlement, you may appear at the hearing. Please note that the hearing may be continued without further notice to the Class.

Class members may appear at the final approval hearing remotely using the Microsoft Teams link for Department 3 (Afternoon Session). Instructions for appearing remotely are provided at https://www.scscourt.org/general_info/ra_teams/video_hearings_teams.shtml and should be reviewed in advance. Class members who wish to appear remotely are encouraged to contact class counsel at least three days before the hearing is possible, so that potential technology or audibility issues can be avoided or minimized.

18. When will I get money after the hearing?

The Court will hold a hearing on January 18, 2023, to decide whether to approve the settlement. If the Court approves the settlement, after that there may be appeals if anyone objects. It is always uncertain when these objections and appeals can be resolved, and resolving them can take time.

If the Court approves the settlement and if you do not opt out, your individual payment set forth in Section 8 above is expected to be distributed after Defendants make payment to the Settlement Administrator. If there are no objections or appeals, Defendants will have thirty days from the date the Court grants final approval of the settlement to transfer the Gross Settlement Amount plus Defendants' share of employer-side payroll taxes into a Qualified Settlement Fund established by the Settlement Administrator either directly or by sending the funds to the Settlement Administrator to be deposited and distributed. The Settlement Administrator will have ten court days after receiving the Defendants' payment to use these funds to fund payment of the Individual Settlement Payments to Participating Class

Members, Class Counsel's attorneys' fees and costs, the Incentive Award, and the Settlement Administration Costs.

If there are objections or appeals, the payment can be delayed by at least 65 days, or even over a year. To check on the progress of the settlement, contact the Settlement Administrator or Class Counsel at the phone number or address listed in Sections 13, 16, and 19.

GETTING MORE INFORMATION

19. Are more details available?

The above is a summary of the basic terms of the Settlement. For the precise terms and conditions of the Settlement, you are referred to the detailed Settlement Agreement, which is on file with the Clerk of the Court. The pleadings and other records in this litigation, including the Settlement Agreement, may be examined (a) online on the Superior Court of California, County of Santa Clara's Electronic Filing and Service Website at <https://portal.scscourt.org/>, or (b) in person at Records, Superior Court of California, County of Santa Clara, 191 N. 1st Street, San Jose, California 95113, between the hours of 8:30 a.m. and 4:00 p.m., Monday through Friday, 5 excluding Court holidays and closures.

To view this Notice, Settlement Agreement and the Court's Order Granting Preliminary Approval of the Settlement online, you can also visit <https://www.cptgroupcaseinfo.com/JSRMicroSettlement>.

Any questions regarding this Class Notice or the Lawsuit may be directed to the Settlement Administrator at the below address and telephone number. Alternatively, you may contact your own attorney, at your own expense, to advise you, or you may contact Class Counsel at the address, telephone number or email address set forth above. If your address changes, or is different from the address on the envelope enclosing this Notice, please promptly notify the Settlement Administrator.

Settlement Administrator:

Anthony Sanchez v. JSR Micro, Inc. Settlement Administrator
c/o CPT Group Inc.
50 Corporate Park
Irvine, CA 92606
Telephone: 1(888) 846-0373
Fax: 949-419-3446

**PLEASE DO NOT CALL THE COURT, OR ANY OF DEFENDANTS' MANAGERS,
SUPERVISORS, OR DEFENDANTS' ATTORNEYS WITH QUESTIONS ABOUT THIS
NOTICE.**