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Attorneys for Plaintiffs

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

KATHLEEN GRACE, REGINA DELGADO,
ALICIA GRIJALVA, JAVIER TERRAZAS,
and all others similarly situated,

Plaintiffs,

v.

THE WALT DISNEY COMPANY, WALT
DISNEY PARKS AND RESORTS, US INC.,
SODEXO, INC., SODEXOMAGIC, LLC, and
Does 1-100,

Defendants.

Case No. 30-2019-01116850-CU-OE-CXC

**DECLARATION OF REGINA DELGADO
IN SUPPORT OF PLAINTIFFS' MOTION
FOR ORDER GRANTING FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

Judge: Hon. William D. Claster
Hearing Date: September 12, 2025
Time: 9:00 a.m.
Dept.: CX-101

Action Filed: December 6, 2019

DECLARATION OF REGINA DELGADO

I, REGINA DELGADO, hereby declare as follows:

1. I am over eighteen years of age. I submit this declaration in support of Plaintiffs' Motion for an Order Granting Final Approval of the Class Action Settlement. I make this declaration based on my own personal knowledge, and I could and would testify competently to the following facts if called upon to do so.

2. I was hired as a CT Food Service Worker on June 7, 2013, by Walt Disney Parks and Resorts U.S., Inc. at the hourly rate of \$9.58/hour. I worked in this role until July 5, 2013, when I left for another opportunity. I returned to work for Walt Disney Parks and Resorts U.S., Inc. as a CT Food Service Worker at the Plaza Inn located within the Disneyland Park in Anaheim, California ("Disneyland") on June 1, 2014. My employer is Walt Disney Parks and Resorts U.S., Inc., which controls my wages, hours, and working conditions.

3. I worked as a CT Food Service Worker at Plaza until I went on medical leave from December 4, 2019, through September 8, 2020. On September 8, 2020, I was furloughed due to the COVID-19 pandemic.

4. As a food service worker, I helped to prepare the front counters for breakfast, put out utensils, set up food, made sure the restaurant and beverage counter were stocked for dinner, received customer payment, took the restaurant area apart to clean, and prepared the space for the next morning, among other tasks.

5. My hourly rate on January 1, 2019, was \$12/hour. I received a raise to \$15/hour on September 1, 2019.

6. My employment ended on June 27, 2022.

7. I understand that as a class representative, I have had a special responsibility in helping with this case.

8. I volunteered to serve as a class representative. I decided to become a class representative to bring claims for Defendants' failure to compensate in accordance with Anaheim's Living Wage Ordinance. I felt it was important for all the workers to get compensated for unpaid wages.

9. In May 2019, I spoke to attorneys from Hadsell Stormer Renick & Dai LLP and McCracken, Stemerman & Holsberry, LLP about my employment at Disneyland and answered questions regarding the work I performed as a food service worker, particularly with respect to hourly pay, work shifts, schedules, and duties. I gave the attorneys detailed information based on my own experience. I also spent time reviewing my records and searching for documents that my attorneys requested or had questions about. Prior to the filing of the Complaint on December 6, 2019, I spent approximately 20 hours talking with the attorneys and gathering information to assist with this case.

10. I spent considerable time responding to written discovery, producing relevant documents, and preparing for and having my deposition taken by Defendant. I traveled to and from my attorneys' office in Pasadena, paid for parking, and participated via Zoom. The deposition took several hours. Also, in addition to this declaration, I provided a declaration in support of Plaintiffs' motion for class certification. I spent time providing information for the declaration, reviewing and signing the declaration. I have spent approximately 30 hours responding to written discovery, preparing for and attending my deposition on June 11, 2021, and providing information for my declaration.

11. In June 2023, I communicated with counsel via email and telephone calls to discuss the appeal hearing, and I ultimately attended the appellate oral argument. I spent approximately 8 hours communicating about, driving to and from, parking at, and attending the appeal hearing.

12. I also worked closely with my attorneys in anticipation of mediation. The mediation was held on July 12, 2024, with retired Judge Layn Phillips. On July 17, 2024, we reached an agreement to settle the case. I made sure to be available for the attorneys during the mediations. I spent approximately 4 hours on settlement-related negotiations and preparation.

13. After a settlement was reached, I spent time meeting or on calls with my attorneys to understand the terms of the settlement, and I met and spoke with other class members to inform them of the terms of the settlement. I spent approximately 10 hours meeting or on calls with my attorneys and class members discussing the terms of the settlement.

14. As a class representative, I have made myself available to the other class members throughout the litigation of this case. My former co-workers know that I am a named plaintiff in this case, so they often called to ask me what was going on in the case. I answered their questions if I could,

or I contacted my attorneys to let them know about the questions. Whenever I received an update about the case from my attorneys, I also contacted the other class members I know to advise them about the details of the litigation. During the litigation, I spent approximately 10 hours speaking to my former co-workers about the facts and status of the case and contacting the attorneys to get updates about the case. I have spoken with over 45 of my former co-workers.

15. From the commencement of the case through the entire settlement process, I have spent approximately 82 hours assisting with this lawsuit.

16. From the time the lawsuit was filed in December 2019, through the present, I have also stayed in regular contact with my attorneys regarding this case. The attorneys and their paralegals have contacted me and provided me with information and documents to keep me up-to-date throughout the litigation. I have also actively participated in all stages of the case by calling the attorneys if I had questions, and meeting or speaking on the telephone with them when they needed information or had questions.

17. When I brought this case, I understood that there was a risk of retaliation by my employer in having my name associated with this lawsuit. I also understood that it could give me a reputation as an employee who will file a lawsuit against her employer, which has the real potential of jeopardizing future employment for me. Even though I have experienced and will continue to endure the stress of knowing that I may be prevented from future employment for bringing this lawsuit on behalf of the Class, I decided to bring it anyway to make sure that employees at my job were paid their wages at the proper rate required by the Anaheim living wage ordinance and in accordance with other applicable laws.

18. The \$20,000 service payment is requested to compensate me for my role in coming forward on behalf of the other Class Members and: (1) initiating my litigation and being an active participant throughout the entire case; (2) participating in multiple conferences with my attorneys since before the case was filed, spending numerous hours speaking with them, and exchanging emails or text messages; (3) searching for and providing relevant documents to my attorneys and answering written questions concerning my experiences on the job; (4) preparing for and having my deposition taken by Defendant; (5) bringing a class action lawsuit against my former employer with risk of retaliation; (6)

consenting to the Settlement, and then reviewing and signing the Settlement Agreement; and (7) signing off on a release of any claims I might have had against Defendants The Walt Disney Company and Walt Disney Parks and Resorts, US Inc.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on 08/12/2025 at Chino, California.



REGINA DELGADO