

Randy Renick (SBN 179652)
rrr@hadsellstormer.com
Cornelia Dai (SBN 207435)
cdai@hadsellstormer.com
HADSELL STORMER RENICK & DAI LLP
128 North Fair Oaks Avenue, Suite 204
Pasadena, California 91103-3645
Telephone: (626) 585-9600
Facsimile: (626) 577-7079

Richard G. McCracken (SBN 62058)
rmccracken@msh.law
Sarah Grossman-Swenson (SBN 259792)
sgs@msh.law
McCRACKEN, STEMERMAN & HOLSBERRY, LLP
475 14th Street, Suite 1200
Oakland, CA 94612
Telephone: (415) 597-7200
Facsimile: (415) 597-7201

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 ALICIA GRIJALVA
LEWIS 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 ALICIA GRIJALVA LEWIS

I, ALICIA GRIJALVA LEWIS, 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 Theme Park Hair Stylist at the Disneyland Park in Anaheim, California (“Disneyland”), under the designation “Cosmetology I” on October 28, 2017. My employer is Walt Disney Parks and Resorts U.S., Inc., which controls my wages, hours, and working conditions.

3. I have worked as a Theme Park Hair Stylist at Disneyland since October 28, 2017, until I was furloughed on March 16, 2020 due to the COVID-19 pandemic. I returned to work at Disneyland in the same role on April 11, 2021.

4. My job duties involved working on hair and makeup for performers at many different Disney venues, including but not limited to the Hyperion Theater Frozen Show, Mickey’s Magical Map, Dora Milaje, Dr. Strange, Bistro, Magic Happens, Halloween, Soundsational, Coco, Christmas Parade, Santas, Star Wars Galaxy Edge, Talent, Paint the Night, and Animatronics. This included getting trained on each venue, taking care of wigs, putting wigs on performers, cleaning wigs, doing performers’ make-up, and helping to build various parades, including but not limited to Magic Happens and the Christmas Parade. Since February 2023, I have also been a new hire trainer.

5. My hourly rate on January 1, 2019, was \$12/hour. I received a raise to \$17/hour on October 24, 2019, which was made retroactive to June 30, 2019. Per my union contract, my pay rate increased to \$17.25/hour on July 1, 2020.

6. I understand that as a class representative, I have had a special responsibility in helping with this case, which I have taken very seriously.

7. 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 back wages.

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8. In April 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 hair stylist, 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 15 hours talking with the attorneys and gathering information to assist with this case.

9. I spent considerable time responding to written discovery, producing relevant documents, and preparing for and having my deposition taken by Defendant. 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 25 hours responding to written discovery, preparing for an attending my deposition on May 14, 2021, and providing information for declarations.

10. In June 2023, I communicated with counsel via email and telephone calls to discuss the appeal hearing. I spent approximately 1.5 hours discussing the status of the appeal.

11. 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 2 hours on settlement-related negotiations and preparation.

12. 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 5 hours meeting or on calls with my attorneys and class members discussing the terms of the settlement.

13. 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

1 details of the litigation. During the litigation, I spent approximately 15 hours speaking to my former co-
2 workers about the facts and status of the case and contacting the attorneys to get updates about the case.
3 I have spoken with over 100 co-workers.

4 14. From the commencement of the case through the entire settlement process, I have spent
5 approximately 63.5 hours assisting with this lawsuit.

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

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

20 17. The \$20,000 service payment is requested to compensate me for my role in coming
21 forward on behalf of the other Class Members and: (1) initiating my litigation and being an active
22 participant throughout the entire case; (2) participating in multiple conferences with my attorneys since
23 before the case was filed, spending numerous hours speaking with them, and exchanging emails or text
24 messages; (3) searching for and providing relevant documents to my attorneys and answering written
25 questions concerning my experiences on the job; (4) preparing for and having my deposition taken by
26 Defendant; (5) bringing a class action lawsuit against my former employer with risk of retaliation; (6)
27 consenting to the Settlement, and then reviewing and signing the Settlement Agreement; and (7) signing
28 off on a release of any claims I might have had against Defendants The Walt Disney Company and Walt

1 Disney Parks and Resorts, US Inc.

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

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ALICIA GRIJALVA LEWIS