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Attorneys for Plaintiffs & Plaintiff Class

**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 RANDY RENICK
IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Judge: Hon. William D. Claster

Dept.: CX101

Action Filed: December 6, 2019

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1. I am a partner at the law firm of Hadsell Stormer Renick & Dai LLP. I am a member of the California Bar, and I am counsel for Plaintiffs in the above-captioned case, as well as counsel for the certified Plaintiff Class. I offer this declaration in support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement.

3. My partner Cornelia Dai and I, as well as Richard McCracken and Sarah Grossman-Swenson of McCracken, Stemerman & Holsberry, LLP seek appointment as Class Counsel in this matter. As set forth below, my firm has handled dozens of similar wage and hour class actions, as well as other types of class and complex litigation.

4. My firm Hadsell Stormer Renick & Dai LLP and co-counsel McCracken, Stemerma n & Holsberry, LLP are highly experienced class action lawyers, having handled dozens of similar wage and hour class actions, as well as other types of class and complex litigation. My firm's qualifications are discussed in detail below and the qualifications of McCracken, Stemerma n & Holsberry, LLP are set forth separately in the Swenson Declaration. Both firms, based on their many years of experience, recommend the proposed settlement and believe that it is in the best interests of the Settlement Class.

5. My firm, Hadsell Stormer Renick & Dai LLP, has substantial litigation experience in wage and hour class actions. I am fully familiar with the legal and factual issues in this case, having handled dozens of wage and hour class actions as well as other types of class action and complex litigation. I specialize in complex cases and class action litigation, including wage and hour, antitrust, employment, civil rights and public interest litigation. I am a graduate of Southwestern School of Law and have been specializing in complex litigation since 1995, first with Hadsell & Stormer, Inc., and from January 1, 2000, until December 31, 2007, with the Law Offices of Randy Renick. Since January 1, 2008, I have been a partner with Hadsell Stormer Keeny Richardson & Renick, LLP, and its successors Hadsell Stormer Richardson & Renick, LLP and Hadsell Stormer Renick & Dai LLP. I was

1 selected as a “Rising Star” by the Los Angeles Magazine and Law & Politics Magazine for 2004 and
2 have also been selected as a “Super Lawyer” by Los Angeles Magazine and Law & Politics Magazine
3 for the last fourteen (14) years. I have been one of only a few plaintiff-side employment lawyers
4 selected for inclusion on the “Best Lawyers in America” list each year since 2007. My C.V. is attached
5 hereto as Exhibit A.

6 6. I am regularly asked to give lectures regarding public interest and class action litigation
7 to lawyers, law students and public interest organizations, including by the following organizations: the
8 University of California at Los Angeles School of Law; the State Bar of California Labor and
9 Employment Section; the Los Angeles County Bar Labor and Employment Section; the Coalition
10 Against Slavery and Trafficking; and the Western Trial Lawyers Association.

11 7. Cornelia Dai is a partner at Hadsell Stormer Renick & Dai LLP, and was formerly an
12 associate with Hadsell & Stormer, Inc. Ms. Dai is frequently asked to speak on employment and wage
13 and hour topics by legal organizations and law schools. Ms. Dai is a 1995 graduate of U.C. Berkeley,
14 and she earned her Juris Doctorate from U.S.C. Law School in 1999. Over the last 20 years, in
15 particular, she has litigated numerous wage and hour class actions, including *Wang v. Chinese Daily*
16 *News*, a class action in federal court involving violations of overtime and meal and rest break laws that
17 ultimately settled after more than 10 years of litigation. Ms. Dai was also one of the plaintiffs’ counsel
18 in *South Central Farmers Feeding Families v. City of Los Angeles*, a case brought on behalf of over 300
19 low-income families in a struggle to preserve land for a much-needed urban community garden in South
20 Los Angeles. In addition, she was one of the Doe plaintiffs’ counsel in the state litigation of the
21 international human rights case *Doe v. Unocal*.

22 8. Ms. Dai has been named to the Southern California Super Lawyers® list as a Rising Star
23 or Super Lawyer each year since 2005 and has been listed in The Best Lawyers in America every year
24 since 2012. In 2017, 2019, 2022, and 2023, she was named Lawyer of the Year in Southern California
25 by Best Lawyers for Litigation - Labor and Employment (Pasadena). In 2018, she was named Lawyer
26 of the Year in Southern California by Best Lawyers for Employment Law – Individuals (Pasadena). In
27 addition, Ms. Dai has been named to the Top 50: 2023 Women Southern California Super Lawyers List.
28 Ms. Dai serves on the Board of the California Employment Lawyers Association, and she is Chair of the

Los Angeles County Bar Association’s Labor and Employment Law Section.

9. My firm is highly experienced in class action and other complex litigation and has substantial experience litigating living wage ordinance class actions and wage and hour class actions. We are fully familiar with the legal and factual issues in this case. Based on our experience and knowledge, we believe that the settlement is fair, reasonable, and adequate. In assessing the value of the claims, we considered the Disney Defendants’ defenses to penalties, the chances of prevailing on penalties, applicable case law and regulations, the circumstances of the case, and potential risks and delays.

10. On December 6, 2019, my firm served a Labor Code 2699.3 Notice Letter to the California Labor and Workforce Development Agency (“LWDA”) stating that on December 6, 2019, the Named Plaintiffs in this action filed a civil complaint against Defendants The Walt Disney Company and Walt Disney Parks and Resorts, US Inc. on behalf of themselves and other similarly situated employees, alleging violations of the Anaheim Living Wage Ordinance (“LWO”), Anaheim Municipal Code, Chapter 6.99, violation of Labor Code § 203 (Waiting Time Penalties), Unfair Business Practices in violation of Business and Professions Code § 17200 et seq., Violation of Labor Code §§ 510, 1194 & 1198 (Overtime Wages), and the Private Attorneys General Act. A true and correct copy of the December 6, 2019, Notice to the LWDA and proof of service is attached hereto as Exhibit B.

11. On December 1, 2023, my firm served an Amended Labor Code 2699.3 Notice Letter to the California Labor and Workforce Development Agency (“LWDA”) amending the December 6, 2019, Notice Letter to provide notice that Plaintiffs were pursuing penalties for violations of Labor Code § 226 for inaccurate wage statements. A true and correct copy of the December 1, 2023, Amended Notice to the LWDA and proof of service is attached hereto as Exhibit C.

12. Ten (10%) percent of the Settlement, or \$23,300,000, is allocated to PAGA penalties, of which 75% (\$17,475,000) will be paid to the California Labor and Workforce Development Agency (“LWDA”), as required by law. The proof of service of the settlement agreement on the LWDA and confirmation is attached here to as Exh. D.

13. The total settlement is \$233,000,000, which includes payment to the Class Members, the

1 Named Plaintiffs' service awards, the LWDA payment for PAGA penalties, attorneys' fees and costs,
2 the employees' share of payroll taxes, and administration costs. Plaintiffs' counsel will apply for up to
3 fifteen percent of the common fund (\$34.5 million) in fees and for the reimbursement of no more than
4 \$740,000 in costs. Plaintiffs intend to seek a service award for each of the three Class Representatives
5 of \$20,000, for a total of \$60,000. Payment to the LWDA for PAGA penalties will be \$17,475,000
6 (75% of the PAGA Allocation). The Parties expect administration costs will be no greater than
7 \$200,000. This means that Class members will share in the sum of at least \$179,575,000.

8 14. After the parties reached agreement on all material terms, I interviewed numerous class
9 action administrators to determine which administrator was best qualified to administer the settlement in
10 this matter. Given the size of the class, and the abundance of payroll and timecard data we had gathered
11 in this matter, we prioritized finding an administrator that had managed large and complex class action
12 settlements. After identifying three administrators who we believed to be qualified we provided all
13 three the specific administration criteria so that they could bid for the assignment. Ultimately, we
14 received bids from two administrators. The bid from A.B. Data, Ltd. ("AB Data") was the lowest at
15 \$146,158. Given my experience with large class action settlements, I am aware that complications in
16 the administration often arise resulting in additional costs. AB Data has agreed that their costs will not
17 exceed \$200,000.

18 15. The proposed Notice that is set forth as Exhibit A to the Settlement Agreement attached
19 as Exhibit 1 to the Swenson Declaration includes the following information for class members: 1) a
20 class definition; 2) a description of the substantive issues and proceedings to date; 3) a neutral
21 description of the proposed settlement; 4) the amount of attorneys' fees and costs sought; 5) the right to
22 request to be excluded from the Class and the opt-out procedure and 60-day period for submitting the
23 request for exclusion; 6) the right to challenge the data used to calculate the individual class member's
24 allocation; 7) the right to object within 60 days and the procedure for submitting a written objection; 8)
25 the consequences of remaining a class member; 9) the date, time, and place of the final approval
26 hearing; and 10) contact information for Plaintiffs' counsel.

27 16. Additionally, the Notice will include an estimated value of each individual claim as well
28 as the data used to calculate the allocation. The Class Notice will be translated into Spanish, and both

English and Spanish versions will be provided to each Class Member. Based on our extensive communications with class members and understanding of the primary languages spoken by the class, we do not believe there is a need to provide the notice in languages other than English and Spanish, but it will be made available in other language upon request. The Notice contains (1) contact information for class counsel; (2) a website that includes links to the notice and important case documents; and (3) the Court's website for those who wish to review the case docket.

17. In addition, the Claims Administrator will maintain a website, which will include the Class Notice, the Motions for Preliminary and Final Approval, and the Motion for Attorneys' Fees and Costs. The Motion for Attorneys' Fees and Costs and any related filings shall be available on the website for a reasonable period of time of no less than 16 calendar days prior to the deadline for Class Members to submit a written objection to the Settlement.

18. The Administrator shall take specific measures to ensure (a) the highest percentage of Class Members receive the Notice; and (b) that it has the most current and accurate addresses for Class Members by performing a National Change of Address database search for all returned mail and by conducting skip trace searches on all mail and checks returned as undeliverable so that Class Members can participate in the Settlement and share in the money recovered.

19. The Administrator shall also provide toll-free telephone support and a post office box to facilitate Class Member communications; maintain appropriate databases to fulfill its duties; receive, control, and account for all returned Notices, disputes, requests for exclusion, and objections; calculate the Class Members' payments; and prepare and deliver regular reports to Class Counsel and Counsel for Defendants containing information concerning Notice, administration, and implementation of the Settlement Agreement.

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20. The Administrator shall also provide proof of payment of penalties to the LWDA. In addition to the duties identified above, the Administrator shall prepare final declarations, reports, and invoices that accurately describe the notice process, the level of participation, and actions taken to ensure that the best possible notice of the Settlement was provided to Class Members.

I declare under penalty of perjury pursuant to the laws of the United States and the State of California that the foregoing is true and correct and that this declaration was executed on December 13, 2024, at Pasadena, California.

/s/ Randy Renick

Randy Renick

Declaration of Randy Renick
EXHIBIT A

Randy Renick, a partner with Hadsell Stormer Renick & Dai LLP in Pasadena, California, specializes in complex cases and class action litigation, including wage and hour, antitrust, employment, civil rights, and public interest litigation. Mr. Renick was selected as a “Rising Star” by the Los Angeles Magazine and Law & Politics Magazine for 2004 and has also been selected as a “Super Lawyer” each year since 2005. He was one of only a few Plaintiff-side Employment Lawyers selected for the “Best Lawyers in America” each year since 2007.

Mr. Renick is regularly asked to give lectures regarding public interest and class action litigation to lawyers, law students and public interest organizations; including the National Employment Lawyers Association; the University of California at Los Angeles School of Law, State Bar of California Labor and Employment Section; Los Angeles County Bar Labor and Employment Section, California Employment Lawyers Association, The Coalition Against Slavery and Trafficking, and the Western Trial Lawyers Association.

Mr. Renick is a graduate of Southwestern School of Law and has been specializing in complex litigation since 1995, first with Hadsell & Stormer, Inc. and from January 1, 2000, until December 31, 2007, with the Law Offices of Randy Renick. Since January 1, 2008, Mr. Renick has been a partner with Hadsell Stormer Renick & Dai LLP.

During his career, Mr. Renick has served as Lead or Class Counsel in a significant number of important individual and class action cases, including:

Wang v. Chinese Daily News, Case No. CV-04-1498 CBM, U.S. District Court for the Central District of California. Served as Lead Counsel in a jury trial representing a class of hourly newspaper employees involving claims of unpaid overtime and other wage and hour violations. After jury and bench trial, obtained a judgment in favor of his clients for more than \$5,200,000 in 2015. Opinion at (*Wang v. Chinese Daily News, Inc.* (9th Cir. 2010) 623 F.3d 743.). Matter settled in 2016 for \$7.8 Million. It was the tenth largest class action settlement in California in 2016.

City of Los Angeles Service Charge Cases, Lead Case BC377050, Los Angeles Superior Court, Judge William Highberger. Class Counsel in five separate actions on behalf of hourly workers against various Century Boulevard hotels alleging violations of the City of Los Angeles Service Charge Ordinance. Defended the constitutionality of the Ordinance on Appeal in the published decision of *Garcia v. Four Points Sheraton LAX* (2010) 188 Cal. App. 4th 36.

Grace v. The Walt Disney Company, Case No. 30-2019-01116850, Orange County Superior Court, Judge William D. Claster. Appointed Class Counsel for class of more than 25,000 Class Members seeking to recover unpaid wages, penalties and interest pursuant to the City of Anaheim’s Living Wage Ordinance. Matter is ongoing.

Guzman v. Dow Agrosciences LLC, Case No. 3:22-CV-04962-RS, United States District Court for the Northern District of California. Served as Co-Lead Counsel in action brought on behalf of Operators for reporting time and on-call violations. Matter settled in 2024 for \$3,800,000. 194 class members recovered \$14,129 on average.

Craig v. Corteva, Inc., Case No. 3:19-cv-07923-JCS, U.S. District Court for the Northern District of California. Served as Co-Lead Counsel in action brought on behalf of Operators for meal and rest break violations. Matter settled in 2022 for \$3,800,000 with 223 class members receiving a check averaging \$12,511.

Espino v. Sky Chefs, Inc., 19STCV44265, Los Angeles Superior Court. Appointed Class Counsel for 1,231 airline catering workers in action to recover unpaid living wages. Obtained settlement in 2022 for \$5,000,000 resulting in average payment of \$2,611.

Kendig v. ExxonMobil Oil Corp., Case No. 2:18-cv-09224, U.S. District Court for the Central District of California. Served as Co-Lead Counsel in action brought on behalf of Oil Refinery Operators for rest break violations. Matter settled in 2019 for \$4,391,585 with 335 class members receiving a check averaging \$9,500.

Valliere v. Tesoro Refining and Marketing Company LLC, Case No. 3:17-cv-00123-JST, United States District Court for the Northern District of California. Served as Co-Lead Counsel in action brought on behalf of Oil Refinery Operators for rest break violations. Matter settled in 2019 for \$15,250,000. It was the fourteenth largest settlement in California in 2019.

Berlanga, et al. v. Equilon Enterprises LLC, et al., Case No. 4:17-cv-00282-MMC, United States District Court for the Northern District of California. Rest break case brought on behalf of Refinery Operators. Matter settled in 2019 for \$7,750,000 with 497 class members receiving a check averaging over \$11,000.

Clack v. Chevron Corporation, Chevron U.S.A. Inc. dba Chevron Products Company and ChevronTexaco Global Lubricants, Case No. BC649514. Los Angeles Superior Court of Central District of California, Judge Amy D. Hogue. Served as Co-Lead Counsel in action brought on behalf of approximately 1,500 Oil Refinery Operators for rest break violations. Matter settled in 2020 for \$17,375,000. It was the largest labor and employment settlement in California in 2020.

Buzas v. Phillips 66 Company, Case No. 4:17-cv-00163-YGR, United States District Court for the Northern District of California. Served as Co-Lead Counsel in action brought on behalf of 500 Oil Refinery Operators for rest break violations. Matter settled in 2018 for \$5,500,000.

Murphy v. CVS Caremark, BC 464785, Los Angeles Superior Court. Class Counsel in wage and hour class action brought on behalf of more than 70,000 hourly employees. Suit alleged various violations, including the failure to pay employees while subject to employer control during security checks. Matter settled in 2017, prior to trial, for \$12,750,000. It was the eighth largest labor and employment settlement in California in 2017.

Diaz v. Accor Business and Leisure North America, Inc. dba Sofitel Hotel Los Angeles at Beverly Hills, Case No: BC 621422, Los Angeles Superior Court. Reached settlement on behalf of class with 450 estimated members in the Settling Class. Matter settled in 2017 for \$690,000.00.

Diaz v. Grill Concepts Services, Inc., dba Daily Grill, Case No. BC 542720, Los Angeles Superior Court. Served as Lead Counsel in bench trial to recover back wages, interest and waiting time penalties against hotel restaurant under the City of Los Angeles' Airport Hotel Living Wage Ordinance. In January 2017, plaintiffs prevailed on all claims at trial, and received a favorable judgement of \$864,756.84. The verdict was approved on appeal. *Diaz v. Grill Concepts Services, Inc.* (2018) 23 Cal.App.5th 859.

Aguilar v. Flying Foods Group Pacific, Inc., Case No. BC 553539, Los Angeles Superior Court. Represented Class of employees with claims of unpaid overtime and other wage and hour violations failures. As Class Counsel, sought damages, restitution, and other relief for the Class for the period from August 1, 2010, to the present. Matter settled in 2018 for \$4,150,000.00. It was the fourteenth largest labor and employment settlement in the U.S. in 2018.

Barrientos v. Hilton Los Angeles Airport, Case No. BC403925, Los Angeles Superior Court. The Lawsuit was filed on December 16, 2008, and the alleged class period dated back to December 16, 2004. Parties agreed to resolve the Lawsuit by way of settlement in 2011. Defendants paid \$2,500,000.

USW v. ConocoPhillips Company, CV 08-2068 PSG, United States District Court. Class Counsel brought on behalf of refinery operators for on-duty meal periods. Case settled in 2013, prior to trial, for \$15,500,000. Published opinion can be found at (*United Steel, Paper & Forestry, Rubber, Mfg. Energy v. ConocoPhillips Co.* (9th Cir. 2010) 593 F.3d 802.)

Ochoa v Brisam LAX, Case No. BC 493242, Los Angeles Superior Court. Class Counsel in wage and hour class action against hotel for failing to pay employees the Living Wage under the City of Los Angeles' Airport Hotel Living Wage Ordinance. Matter settled for \$390,000.

Parmer v. Ziba Beauty Center, Inc., Case No. BC 392872, Los Angeles Superior Court. For unpaid wages and statutory penalties, agreed upon resolution by Settling Parties at \$250,000 in 2012.

Andrade v. Terra Universal (2011), Case No. 00473739-CU-OE-CX, Orange County Superior Court. Parties agreed to settle this action for \$450,000. The settlement was made in 2011, after over a year of extensive discovery and hard-fought litigation, for an amount that was proposed by the mediator, retired Superior Court Judge Haley Fromholz.

Small v. Brinderson, Case No. 04CC00717, Orange County Superior Court. Served as Lead Counsel for certified class of more than 5,000 construction trade employees for overtime, meal and rest break claims. Case resolved in 2010 for \$5,250,000.

Diaz v. ABM Industries, Inc., Case No. BC362932, Los Angeles Superior Court. Lead Counsel for certified class of more than 5,000 employees seeking damages for employer's failure to provide meal periods. Case resolved in 2011 for \$4,900,000.

Morales v. Aramark Corporation., CV-09-05565, U.S. District Court for the Central District of California. Lead Counsel for class of more than 20,000 food service workers alleging claims for meal and rest period, and overtime violations. Case resolved in 2010 for \$3,900,000.

Navarro v. Pacifica Hosts Hotels, Inc. (2008), Case No. BC352017, Los Angeles Superior Court. Class Counsel for class of more than 4,000 hourly employees at nineteen hotels in California with claims of unpaid overtime, missed meal and rest breaks. Matter settled for in 2008 for \$6,500,000.

John Amaro v. the Ritz-Carlton, Huntington Hotel & Spa, Case No. BC 376739, Los Angeles Superior Court. Lead Counsel for class of 800 hotel workers alleging employer failed to pay wages and provide meal and rest breaks. Settled case in 2008 for \$975,000.

Soto v. Starwood Hotels & Resorts Worldwide, Inc., Case No. BC 352849, Los Angeles Superior Court. Class Counsel for hourly hotel workers at Westin LAX hotel alleging meal and rest break and overtime violations. Settled in 2007 for \$3,000,000.

Hernandez v. Tyco International (US) Inc., Case No. BC315749, Los Angeles Superior Court. Lead Counsel for class of 450 hourly production employees with claims for unpaid overtime, meal and rest break violations. Case resolved in 2008 with settlement of \$4,900,000.

De La Rosa v. ICC Collision Centers, Case No. BC 389024, Los Angeles Superior Court. Represented class of body shop workers who were denied overtime. Case settled in 2009 for nearly \$250,000.

Rogers v. Weyerhaeuser Corp., Case No. CV-05-06076 NM, U.S. District Court for the Central District of California. Class Counsel for 125 hourly employees alleging meal and rest break and overtime violations against employer. Settled in 2005 for \$1,500,000.

Pinney v. Great Western Bank, Case No. BC 146276 and CV-95-2110-IH, U.S. District Court for the Central District of California and LA Superior Court. Served as counsel in securities fraud and invasion of privacy class action. The matter settled in 1996 for more than \$16 Million.

Levitan v. TV Fanfare Media Inc., Case No. BC 241713, Los Angeles Superior Court. Served as Lead Counsel in Wage and Hour Class Action Case representing class of individuals misclassified as Independent Contractors. Los Angeles Superior Court Judge Charles W. McCoy granted final approval to the \$1.85 Million settlement in April of 2004.

Ruiz v. Jackson (2004), Case No. SC076090, Los Angeles Superior Court. In 2004, obtained jury verdict of \$825,000 on behalf of Philippine plaintiff brought to Los Angeles and forced to work 18 hours per day for more than one year without pay. Prevailed on all claims including false imprisonment, fraud, assault, battery and negligence against defendants, one of whom was a lawyer and executive at Sony Pictures. Jury found that the defendants had wrongfully imprisoned Plaintiff by means of violence and threats.

Paige v. State of California, Case No. CV 94-0083 CBM U.S. District Court for the Central District of California. Served as Co-Lead Trial Counsel in the two-month class action trial involving claims against California Highway Patrol alleging discrimination in promotions against Non-White Officers.

Mesfun v. Hagos, Case No. CV 93-02182 MMM U.S. District Court for the Central District of California. Served as Lead Counsel in jury trial involving allegations of False Imprisonment and Labor Code Violations in front of Judge Margaret Morrow. Obtained a jury verdict on Labor Code claim against Defendant.

Mr. Renick also has substantial experience litigating antitrust class action cases in both state and federal courts. Mr. Renick is intimately familiar with the management and organization required to aggressively litigate complicated class action cases involving multiple cases and numerous co-counsel. Some of the antitrust matters in which he has served as counsel include:

In Re TFT-LCD (Flat Panel) Antitrust Litigation, MDL 7269 (Judge Illston) United States District Court, Northern District of California. Antitrust class action on behalf of direct purchasers of LCD screens alleging a nationwide class for price-fixing. The case settled for more than \$400,000,000.

In Re Dynamic Random-Access Memory Antitrust Litigation, MDL 1486 (Judge Hamilton) United States District Court, Northern District of California. Antitrust class action on behalf of direct purchasers of dynamic random-access memory (DRAM) alleging a nationwide class for price-fixing. The case settled for more than \$330,000,000.

In Re Vitamin Cases, J.C.C.P. No. 4076, San Francisco Superior Court. Antitrust class action on behalf of California indirect purchasers of vitamins. The case was settled for \$96,000,000.

In Re California Indirect Purchaser MSG Antitrust Cases, Master File No. 304471, San Francisco Superior Court. Antitrust class action on behalf of California indirect purchasers of Monosodium Glutamate. The case settled for more than \$11,000,000.

In Re Methionine Antitrust Litigation, MDL 1311, CRB, United States District Court, Northern District of California. A nationwide class action on behalf of direct purchasers of methionine alleging price-fixing. The case was settled for \$107,000,000.

In Re California Polychloroprene Cases, J.C.C.P. 4376, Los Angeles Superior Court. Statewide class on behalf of indirect purchasers for Polychloroprene. The matter settled for in excess of \$4,500,000.

In Re Urethane Cases, J.C.C.P. No. 4367, San Francisco Superior Court. Settlements of over \$9,000,000 in antitrust class action on behalf of all California indirect purchasers of urethane and urethane chemicals. Served as Co-Liaison Counsel for Plaintiffs and investigated and vetted the 42 California organization that were approved as recipients of nearly \$8 Million allocated cy pres.

In Re The Harman Press et al. v. International Paper Co. et al., (Consolidated Cases) Master File No. CGC-04-432167, San Francisco Superior Court. Antitrust class action on behalf of all California indirect purchasers of publication paper.

In Re Label Stock Cases, J.C.C.P. No. 4314, San Francisco Superior Court. Antitrust class action on behalf of all California indirect purchasers of high-pressure label stock.

In Re Richard Villa et al. v. Crompton Corporation et al., Consolidated Case No. CGC-03-419116, San Francisco Superior Court. Settlements of over \$2,000,000 antitrust class action on behalf of California indirect purchasers of EPDM.

In Re Russell Reidel et al. v. Norfalco LLC et al., Consolidated Case No. CGC-03-418080, San Francisco Superior Court. Antitrust class action on behalf of California indirect purchasers of sulfuric acid.

In Re Smokeless Tobacco Cases I-IV, J.C.C.P. Nos. 4250, 4258, 4259 and 4262, San Francisco Superior Court. Certified antitrust class action on behalf of California consumers of smokeless tobacco products. The case settled for \$99,000,000 with over \$25,000,000 allocated cy pres.

In Re Electrical Carbon Products Cases, J.C.C.P. No. 4294, San Francisco Superior Court (Private Entity Cases). Settlement of antitrust class action on behalf of California indirect purchasers of electrical carbon products.

In Re Laminate Cases, J.C.C.P. No. 4129, Alameda Superior Court. Antitrust class action on behalf of California indirect purchasers of high-pressure laminate.

In Re Compact Disk Cases, J.C.C.P. No. 4123, Los Angeles Superior Court. Antitrust class action on behalf of California consumers of prerecorded compact disks. Settled for more than \$100,000,000.

In Re Purchaser Auction House Cases, Master Case No. 310313. San Francisco Superior Court. Antitrust class action on behalf of California auction buyers and sellers.

In Re Western States Wholesale Natural Gas Litigation, MDL 1566. Settlements of over \$150,000,000 in antitrust class action on behalf of California buyers of natural gas.

In Re NBR Cases, J.C.C.P. No. 4369, San Francisco Superior Court. Antitrust class action on behalf of California indirect purchasers of NBR.

In Re Intel Corp. Microprocessor Antitrust Litigation, MDL 05-1717 (JJF) USDC, District of Delaware. Antitrust class action on behalf of all consumers in the United States that indirectly purchased Intel x86 microprocessors.

In Re Vitamin C Antitrust Litigation, MDL 06-1738 (DTG)(JO), USDC, Eastern District of New York. Antitrust class action on behalf of all California indirect purchasers of Vitamin C.

Mr. Renick has received numerous honors and awards throughout his years in practice, including:

- Southern California Super Lawyer, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023 and 2024
- Best Lawyers in America, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023 and 2024
- Best Lawyer, Lawyer of the Year - Individual Employment Pasadena 2017 and 2024
- Surfrider 2009 Wavemaker of the Year Award
- California Trout 2018 Streamkeeper Award
- Southern California Rising Star, 2004

Declaration of Randy Renick
EXHIBIT B

December 6, 2019

VIA ONLINE FILING

State of California Labor & Workforce Development
Agency/Department of Industrial Relations

Re: Labor Code Section 2699.3 Notice Letter

**On Behalf of All Aggrieved Employees Against The Walt Disney
Company, Walt Disney Parks and Resorts, US Inc., Sodexo, Inc., and
SodexoMAGIC, LLC**

Dear Secretary Julie Su:

This office represents Kathleen Grace, Thomas Bray, Regina Delgado, Alicia Grijalva, and Javier Terrazas, employees of The Walt Disney Company, Walt Disney Parks and Resorts, US Inc., Sodexo, Inc., and SodexoMAGIC, LLC. (collectively, “Defendants”), who, on December 6, 2019, filed a civil complaint against Defendants, on behalf of themselves and other similarly situated employees, alleging violations of Anaheim Living Wage Ordinance (‘LWO’) Anaheim Municipal Code, Chapter 6.99, violation of Labor Code § 203 (Waiting Time Penalties), Unfair Business Practices in violation of Business and Professions Code § 17200 *et seq.*, Violation of Labor Code Sections 510, 1194 & 1198 (Overtime Wages), and the Private Attorneys General Act. This letter is intended to provide notice pursuant to Labor Code section 2698 *et seq.*

The complaint alleges that Defendants failed to compensate Plaintiffs in accordance with Anaheim’s Living Wage Ordinance, Anaheim Municipal Code Chapter 6.99 (“Living Wage Ordinance” or “Chapter 6.99”), enacted by initiative as Measure L in November, 2018, which became effective on December 4, 2018. The Living Wage Ordinance requires all businesses in the hospitality industry in the Anaheim Resort and the Disneyland Resort who benefit from subsidies received from the City of Anaheim to pay their employees at least \$15 an hour effective January 1, 2019.

Hadsell Stormer Renick & Dai LLP

December 6, 2019

Page 2

The two Disney defendants have not complied with the Living Wage Ordinance in compensating Plaintiffs and the Plaintiff Class despite being the recipient of massive subsidies from Anaheim in the form of tax rebates. The two Sodexo defendants, subcontractors and/or lessees of Disney, are beneficiaries of the city subsidies and have also failed to comply with the Living Wage Ordinance.

The specific violations alleged in the complaint include:

- Violation of Anaheim Living Wage Ordinance, Anaheim Municipal Code, Chapter 6.99;
- Violation of Labor Code § 203 (Waiting Time Penalties);
- Violation of Business and Professions Code § 17200 *et seq.* (Unfair Competition Law);
- Violation of Labor Code §§ 510, 1194 & 1198 (Overtime Wages); and
- Representative Action for Civil Penalties, Labor Code § 2698 *et seq.*

On behalf of themselves and all other aggrieved employees, Plaintiffs seek to recover civil penalties, as provided by statute, for which Defendants are liable as a result of the foregoing violations of the Labor Code sections, including, but not limited to, penalties under Labor Code sections 558, 1197.1, 1199 and 2699(f) and the applicable IWC Wage Orders.

Please let me know within the time period set forth in Labor Code section 2699.3 whether the State will pursue these penalties or whether the employees are free to pursue their civil action against Defendants and seek those penalties.

Thank you for your courtesy and prompt attention to this matter.

Very truly yours,

HADSELL STORMER RENICK & DAI LLC

By /s/ --Randy Renick
Randy Renick

Hadsell Stormer Renick & Dai LLP

December 6, 2019

Page 3

Cc:

Via certified mail

THE WALT DISNEY COMPANY

500 South Buena Vista Street

Burbank, CA 91521

WALT DISNEY PARKS AND RESORTS, US INC.

500 South Buena Vista Street

Burbank, CA 91521

SODEXO, INC.

P.O. Box 352

Buffalo, NY 14240

SODEXOMAGIC, LLC

P.O. Box 352

Buffalo, NY 14240

1 Randy Renick [S.B. #179652]
Cornelia Dai [S.B. #207435]
2 HADSELL STORMER RENICK & DAI LLP
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3 Pasadena, California 91103-3645
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4 Facsimile: (626) 577-7079
Email: rrr@hadsellstormer.com
5 Email: cdai@hadsellstormer.com

6 Richard G. McCracken [S.B. #62058]
Sarah Grossman-Swenson [S.B. #259792]
7 McCRACKEN, STEMERMAN & HOLSBERRY, LLP
475 14th Street, Suite 1200
8 Oakland, CA 94612
9 Telephone: (415) 597-7200
Facsimile: (415) 597-7201
10

11 Attorneys for Plaintiffs
12

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
14 **FOR THE COUNTY OF ORANGE**
15

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

PROOF OF SERVICE

16 KATHLEEN GRACE, THOMAS BRAY,
17 REGINA DELGADO, ALICIA GRIJALVA,
18 JAVIER TERRAZAS, and all others similarly
situated,

19 Plaintiffs,
20

21 v.

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

25 Defendants.
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PROOF OF SERVICE

I am employed in the county of Los Angeles, State of California. I am over the age of 18 and not a party to the action; my business address is 128 N. Fair Oaks Avenue, Pasadena, California 91103.

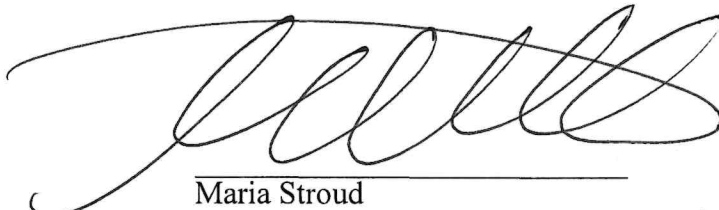
On December 6, 2019, I served the foregoing document described as: **INITIAL PAGA NOTICE**

XX BY ELECTRONIC SUBMISSION:

XX I submitted said document(s) electronically via the State of California Labor and Workforce Development Agency/Department of Industrial Relations website and instructions for the Private Attorneys General Act (PAGA) - Filing portal, located at <https://dir.govfa.net/315>.

XX (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on December 6, 2019, at Pasadena, California.



Maria Stroud
Declarant

From: noreply@salesforce.com on behalf of [LWDA DO NOT REPLY](#)
To: [Maria Stroud](#)
Subject: Thank you for submission of your PAGA Case.
Date: Friday, December 6, 2019 6:54:11 PM

12/6/2019

LWDA Case No. LWDA-CM-760761-19
Law Firm : Hadsell Stormer & Renick LLP
Plaintiff Name : Kathleen Grace, Thomas Bray, Regina Delgado, Alicia Grijalva, Javier Terrazas
Employer: The Walt Disney Company

Item submitted: Initial PAGA Notice

Thank you for your submission to the Labor and Workforce Development Agency. Please make a note of the LWDA Case No. above as you may need this number for future reference when filing any subsequent documents for this Case.

If you have questions or concerns regarding this submission or your case, please send an email to pagainfo@dir.ca.gov.

DIR PAGA Unit on behalf of
Labor and Workforce Development Agency

Website: http://labor.ca.gov/Private_Attorneys_General_Act.htm

Declaration of Randy Renick
EXHIBIT C

December 1, 2023

VIA ONLINE FILING

State of California Labor & Workforce Development
Agency/Department of Industrial Relations

Re: Amended Labor Code Section 2699.3 Notice Letter

**On Behalf of All Aggrieved Employees Against The Walt Disney
Company, Walt Disney Parks and Resorts, US Inc., Sodexo, Inc., and
SodexoMAGIC, LLC**

Dear Secretary Stewart Knox:

This office represents Kathleen Grace, Regina Delgado, Alicia Grijalva, and Javier Terrazas, employees of The Walt Disney Company, Walt Disney Parks and Resorts, US Inc., Sodexo, Inc., and SodexoMAGIC, LLC. (collectively, “Defendants”), who, previously served notice to the LWDA and filed a civil complaint against Defendants, on behalf of themselves and other similarly situated employees, alleging violations of Anaheim Living Wage Ordinance (‘LWO’) Anaheim Municipal Code, Chapter 6.99, violation of Labor Code § 203 (Waiting Time Penalties), Unfair Business Practices in violation of Business and Professions Code § 17200 *et seq.*, Violation of Labor Code Sections 510, 1194 & 1198 (Overtime Wages), and the Private Attorneys General Act, on December 6, 2019. This letter is intended to provide notice pursuant to Labor Code section 2698 *et seq.* regarding an additional Labor Code violation, specifically Labor Code section 226 for inaccurate wage statements, that arises out of the same set of facts as the claims alleged in the 2019 Notice and original complaint.

As set forth in the 2019 Notice, the original complaint alleges that Defendants failed to compensate Plaintiffs in accordance with Anaheim’s Living Wage Ordinance, Anaheim Municipal Code Chapter 6.99 (“Living Wage Ordinance” or “Chapter 6.99”), enacted by initiative as Measure L in November 2018, which became effective on December 4, 2018. The Living Wage Ordinance requires all businesses in the hospitality industry in the Anaheim Resort and the Disneyland Resort who benefit from subsidies received from the City of

Anaheim to pay their employees at least \$15 an hour effective January 1, 2019.

The two Disney defendants have not complied with the Living Wage Ordinance in compensating Plaintiffs and the Plaintiff Class despite being the recipient of massive subsidies from Anaheim in the form of tax rebates. The two Sodexo defendants, subcontractors and/or lessees of Disney, are beneficiaries of the city subsidies and have also failed to comply with the Living Wage Ordinance.

The specific violations alleged in the complaint include:

- Violation of Anaheim Living Wage Ordinance, Anaheim Municipal Code, Chapter 6.99;
- Violation of Labor Code § 203 (Waiting Time Penalties);
- Violation of Business and Professions Code § 17200 *et seq.* (Unfair Competition Law);
- Violation of Labor Code §§ 510, 1194 & 1198 (Overtime Wages); and
- Representative Action for Civil Penalties, Labor Code § 2698 *et seq.*

In their amended complaint, Plaintiffs will additionally allege a violation of Labor Code section 226 based on Defendants' failure to comply with Section 226's wage requirements.

On behalf of themselves and all other aggrieved employees, Plaintiffs seek to recover civil penalties, as provided by statute, for which Defendants are liable as a result of the foregoing violations of the Labor Code sections, including, but not limited to, penalties under Labor Code sections 226.3, 558, 1197.1, 1199 and 2699(f) and the applicable IWC Wage Orders.

Thank you for your courtesy and attention to this matter.

Very truly yours,

HADSELL STORMER RENICK & DAI LLP

By /s/ -- Cornelia Dai
Cornelia Dai

Hadsell Stormer Renick & Dai LLP

December 1, 2023

Page 3

Cc:

Via certified mail

THE WALT DISNEY COMPANY
500 South Buena Vista Street
Burbank, CA 91521

WALT DISNEY PARKS AND RESORTS, US INC.
500 South Buena Vista Street
Burbank, CA 91521

David C. Marcus
WILMER CUTLER PICKERING
HALE AND DORR LLP
350 South Grand Avenue, Suite 2100
Los Angeles, California 90071

Alan E. Schoenfeld
Ryan Chabot
WILMER CUTLER PICKERING
HALE AND DORR LLP
7 World Trade Center
250 Greenwich Street
New York, NY 10007

Attorneys for Disney Defendants

SODEXO, INC.
P.O. Box 352
Buffalo, NY 14240

SODEXOMAGIC, LLC
P.O. Box 352
Buffalo, NY 14240

Carolyn E. Sieve
CONSTANGY, BROOKS, SMITH & PROPHETE, LLP
Plaza Tower
600 Anton Blvd., 11th Floor
Costa Mesa, CA 92626

Attorneys for Sodexo Defendants

From: [DIR, PAGA Unit](#)
To: [Maria Stroud](#)
Subject: Thank you for your Amended PAGA Claim Notice Submission.
Date: Friday, December 1, 2023 1:36:30 PM

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

12/01/2023 01:35:58 PM

Thank you for your submission to the Labor and Workforce Development Agency.

Item submitted: Amended PAGA Claim Notice

If you have questions or concerns regarding this submission or your case, please send an email to pagainfo@dir.ca.gov.

DIR PAGA Unit on behalf of
Labor and Workforce Development Agency

Website: http://labor.ca.gov/Private_Attorneys_General_Act.htm

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1 Randy Renick [S.B. #179652]
Cornelia Dai [S.B. #207435]
2 HADSELL STORMER RENICK & DAI LLP
128 North Fair Oaks Avenue, Suite 204
3 Pasadena, California 91103-3645
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4 Facsimile: (626) 577-7079
Email: rrr@hadsellstormer.com
5 Email: cdai@hadsellstormer.com

6 Richard G. McCracken [S.B. #62058]
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475 14th Street, Suite 1200
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9 Telephone: (415) 597-7200
Facsimile: (415) 597-7201
10

11 Attorneys for Plaintiffs
12

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
14 **FOR THE COUNTY OF ORANGE**
15

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

PROOF OF SERVICE

16 KATHLEEN GRACE, THOMAS BRAY,
17 REGINA DELGADO, ALICIA GRIJALVA,
18 JAVIER TERRAZAS, and all others similarly
situated,

19 Plaintiffs,
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21 v.
22

23 THE WALT DISNEY COMPANY, WALT
DISNEY PARKS AND RESORTS, US INC.,
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PROOF OF SERVICE

I am employed in the county of Los Angeles, State of California. I am over the age of 18 and not a party to the action; my business address is 128 N. Fair Oaks Avenue, Pasadena, California 91103.

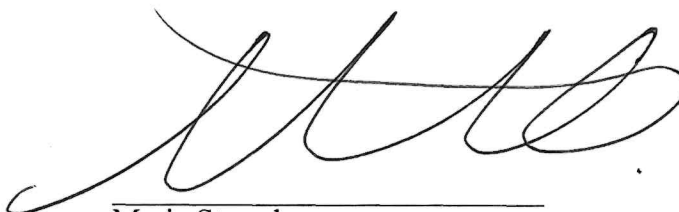
On December 1, 2023, I served the foregoing document described as: **AMENDED PAGA CLAIM NOTICE SUBMISSION**

XX BY ELECTRONIC SUBMISSION:

XX I submitted said document(s) electronically via the State of California Labor and Workforce Development Agency/Department of Industrial Relations website and instructions for the Private Attorneys General Act (PAGA) - Filing portal, located at <https://dir.govfa.net/315>.

XX (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on December 1, 2023, at Pasadena, California.



Maria Stroud
Declarant

Declaration of Randy Renick
EXHIBIT D

1 Randy Renick [S.B. #179652]
Cornelia Dai [S.B. #207435]
2 HADSELL STORMER RENICK & DAI LLP
128 North Fair Oaks Avenue, Suite 204
3 Pasadena, California 91103-3645
Telephone: (626) 585-9600
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Email: rrr@hadsellstormer.com
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6 Richard G. McCracken [S.B. #62058]
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11 Attorneys for Plaintiffs
12

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
14 **FOR THE COUNTY OF ORANGE**
15

16 Case No: 30-2019-01116850-CU-OE-CXC

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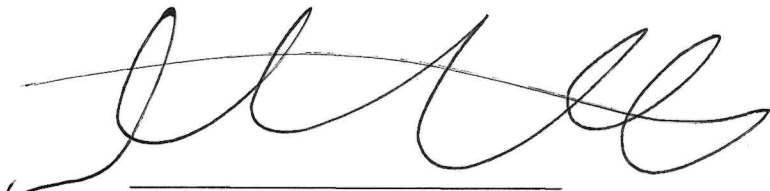
On December 13, 2024, I served the foregoing document described as: **CLASS ACTION SETTLEMENT AGREEMENT**

XX BY ELECTRONIC SUBMISSION:

XX I submitted said document(s) electronically via the State of California Labor and Workforce Development Agency/Department of Industrial Relations website and instructions for the Private Attorneys General Act (PAGA) - Filing portal, located at <https://dir.govfa.net/315>.

XX (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on December 13, 2024, at Pasadena, California.

A handwritten signature in black ink, appearing to read 'Maria Stroud', written over a horizontal line.

Maria Stroud
Declarant

From: [DIR PAGA Unit](#)
To: [Maria Stroud](#)
Subject: Thank you for your Proposed Settlement Submission
Date: Friday, December 13, 2024 2:58:06 PM

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

12/13/2024 02:57:15 PM

Thank you for your submission to the Labor and Workforce Development Agency.

Item submitted: Proposed Settlement
If you have questions or concerns regarding this submission or your case, please send an email to pagainfo@dir.ca.gov.

DIR PAGA Unit on behalf of
Labor and Workforce Development Agency

Website: http://labor.ca.gov/Private_Attorneys_General_Act.htm

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