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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,

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 JAVIER TERRAZAS
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 JAVIER TERRAZAS

I, JAVIER TERRAZAS, 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 Casual Temporary Bar Back in the Banquet Department at the Disneyland Hotel, located within the Disneyland Park in Anaheim, California (“Disneyland”), in September 2011. My employer is Walt Disney Parks and Resorts U.S., Inc., which controls my wages, hours, and working conditions.

3. Disneyland is a theme park and/or amusement park located in the City of Anaheim. Disneyland offers attractions such as rides, themed attractions, restaurants and other dining options, and it also has hotels.

4. About six or seven months after starting as Casual Temporary Bar Back, I was hired as a Casual Regular Part-Time Banquet Server under the designation “Wait Help I.” About two years later, I was promoted to a Full-Time Banquet Server, also under the designation “Wait Help I.” I served as a full-time banquet server from about 2014 until I was furloughed on or around March 16, 2020, due to the COVID-19 pandemic.

5. As a bar back, my job duties involved setting up the portable bars for events, restocking glasses and ice for bartenders, serving as a runner, and giving refills throughout functions. As a banquet server, I built buffets and cleaned up events, including continental breakfast, lunches, dinners, weddings, and special events.

6. My hourly rate on January 1, 2019, was \$12/hour. I received a raise to \$13/hour on January 1, 2020.

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

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1 8. In September 2019, I spoke to attorneys from Hadsell Stormer Renick & Dai LLP and
2 McCracken, Stemerman & Holsberry, LLP about my employment at Disneyland and answered
3 questions regarding the work I performed as a bar back and banquet server, particularly with respect to
4 hourly pay, work shifts, schedules, and duties. I gave the attorneys detailed information based on my
5 own experience. I also spent time reviewing my records and searching for documents that my attorneys
6 requested or had questions about. Prior to the filing of the Complaint on December 6, 2019, I spent
7 approximately 12 hours talking with the attorneys and gathering information to assist.

8 9. I spent considerable time responding to written discovery, producing relevant documents,
9 and preparing for and having my deposition taken by Defendant. The deposition took several hours.
10 Also, in addition to this declaration, I provided a declaration in support of Plaintiffs' motion for class
11 certification. I spent time providing information for the declaration, reviewing and signed declaration. I
12 have spent approximately 60 hours responding to written discovery, preparing for and attending my
13 deposition on May 24, 2021, and providing information for declarations.

14 10. Between April and June 2023, I communicated with counsel via email and telephone
15 calls to discuss the appeal hearing. I spent approximately 1 hour discussing the status of the appeal.

16 11. I also worked closely with my attorneys in anticipation of mediation. The mediation was
17 held on July 12, 2024, with retired Judge Layn Phillips. On July 17, 2024, we reached an agreement to
18 settle the case. I made sure to be available for the attorneys during the mediations. I spent approximately
19 2 hours on settlement-related negotiations and preparation.

20 12. After a settlement was reached, I spent time meeting or on calls with my attorneys to
21 understand the terms of the settlement, and I met and spoke with other class members to inform them of
22 the terms of the settlement. I spent approximately 14 hours meeting or on calls with my attorneys and
23 class members discussing the terms of the settlement.

24 13. As a class representative, I have made myself available to the other class members
25 throughout the litigation of this case. My current and former co-workers know that I am a named
26 plaintiff in this case, so they often called to ask me what was going on in the case. I answered their
27 questions if I could, or I contacted my attorneys to let them know about the questions. Whenever I
28 received an update about the case from my attorneys, I also contacted the other class members I know to

1 advise them about the details of the litigation. During the litigation, I spent approximately 40 hours
2 speaking to my current and former co-workers about the facts and status of the case and contacting the
3 attorneys to get updates about the case. I have spoken with approximately 80 co-workers.

4 14. From the commencement of the case through the entire settlement process, I have spent
5 approximately 129 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 his 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 Garden Grove, California.

5
6 Javier Terrazas
JAVIER TERRAZAS