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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

**[PROPOSED] ORDER GRANTING
PLAINTIFFS' MOTION FOR ATTORNEYS'
FEES AND REIMBURSEMENT OF COSTS**

Date: September 12, 2025

Time: 9:00 a.m.

Judge: Hon. William D. Claster

Dept.: CX101

Action Filed: December 6, 2019

1 **[PROPOSED] ORDER**

2 Plaintiffs' Motion for Attorneys' Fees and Reimbursement of Costs came on for hearing on
3 September 12, 2025, at 9:00 a.m., in Department CX101 of the above-captioned court. Having
4 considered all of the moving papers, the evidence submitted in support of the motion, and oral
5 argument, the Court rules as follows:

6 1. The motion seeks an award of attorneys' fees in the amount of \$34,950,000 (15% of the
7 common fund) and the reimbursement of costs in the amount of \$452,532.85 as part of their class
8 action settlement reached with Defendants The Walt Disney Company and Walt Disney Parks and
9 Resorts US, Inc. ("Disney Settlement"); and in the amount of \$262,500 (15% of the common fund) and
10 reimbursement of costs in the amount of \$7500 as part of their class action settlement reached with
11 Defendants Sodexo, Inc. and SodexoMAGIC, LLC ("Sodexo Settlement"). Plaintiffs seek an award of
12 attorneys' fees in the total combined amount of \$35,212,500, and reimbursement of litigation costs in
13 the combined amount of \$460,032.85 for the Disney Settlement and the Sodexo Settlement.

14 2. The amount of attorneys' fees requested is fair and reasonable as a percentage of the
15 common fund. *See Laffitte v. Robert Half Internat. Inc.*, 1 Cal. 5th 480, 497 (2016); *Serrano v. Priest*,
16 20 Cal.3d 25, 35 (1977). Plaintiffs request a fee award of 15% of the settlement funds, which is
17 significantly lower than the average fee amount of one-third, or 33 1/3%, awarded by California courts
18 in class action cases. *See In re Consumer Privacy Cases*, 175 Cal. App. 4th 545, 557, n.13 (2009)
19 ("Empirical studies show that, regardless whether the percentage method or the lodestar method is
20 used, fee awards in class actions average around one-third of the recovery.'").

21 3. The attorneys' fees requested were entirely contingent upon success. Plaintiffs' Counsel
22 risked time and effort and advanced significant costs and expenses with no ultimate guarantee of
23 compensation. The award is warranted for reasons set out in Plaintiffs' moving papers, including but
24 not limited to, the following: the excellent result obtained for the Class; the quality and quantity of
25 work performed, including extensive discovery, extensive motion practice, an appeal, mediation, and
26 the risks faced throughout the litigation.

27 4. The court finds that Plaintiffs' request for a percentage of the common fund is supported
28 by a lodestar cross-check, which "provides a mechanism for bringing an objective measure of the work

1 performed into the calculation of a reasonable attorney fee.” *Laffitte*, 1 Cal. 5th at 504. “Once the court
2 has fixed the lodestar, it may increase or decrease that amount by applying a positive or negative
3 ‘multiplier’ to take into account a variety of other factors, including the quality of the representation,
4 the novelty and complexity of the issues, the results obtained, and the contingent risk presented.” *In re*
5 *Consumer Privacy Cases*, 175 Cal. App. 4th at 556. *See also Serrano III, supra*, 20 Cal.3d at 49.

6 5. The Court finds that the lodestar that Plaintiffs’ Counsel has accumulated was
7 reasonable and consistent with the litigation in this case. The Court further finds that Plaintiffs’
8 Counsel’s hourly rates were reasonable for the work they performed. In setting an award of attorney’s
9 fees, costs and expenses, the Court has considered the following factors: (1) the time and labor
10 required; (2) preclusion of other employment; (3) the contingent nature of the case; (4) the experience,
11 reputation, and ability of Plaintiffs’ Counsel and the skill they displayed in the litigation; (5) the results
12 achieved; and (6) the reaction of plaintiffs and the class members. *See, e.g. Serrano v. Priest*, 20 Cal.3d
13 25, 49 (1977); *Dunk v. Ford Motor Co.*, 48 Cal.App. 4th 1794, 1810 n.21 (1996).

14 6. The Court further finds that the award sought is reasonable given the range of
15 multipliers that state and federal courts have approved in class actions with large settlements. *See e.g.,*
16 *Vizcaino v. Microsoft Corp.*, 290 F.3d 1043, 1052 (9th Cir. 2002); *see In re Natural Gas Trust Cases*
17 *Price Indexing*, 2006 Cal. Super. LEXIS 1302 at *9 (2006).

18 7. The expenses sought, as detailed in the declarations of Plaintiffs’ Counsel, were incurred
19 in connection with the prosecution of the litigation for the benefit of the Class, and were reasonable and
20 necessary.

21 8. Therefore, upon consideration of the motion and the accompanying declarations, and
22 based upon all matters of record including the pleadings and papers filed in this action and oral
23 argument given at the hearing on this matter, the Court hereby finds that: (i) the attorneys’ fees
24 requested are reasonable and proper; and (ii) the expenses requested were necessary, reasonable, and
25 proper.

26 9. Accordingly, it is hereby ORDERED and DECREED that: (a) Plaintiffs’ Counsel are
27 awarded attorney’s fees in the total amount of \$35,212,500, apportioned \$34,950,000 from the Disney
28 Settlement fund and \$262,500 from the Sodexo Settlement fund, and total costs in the amount of

1 \$460,032.85, apportioned \$452,532.85 from the Disney Settlement fund and \$7500 from the Sodexo
2 Settlement fund.

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4 IT IS SO ORDERED.

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8 DATED: _____, 2025

9 The Honorable William D. Claster
10 Judge of the Superior Court
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