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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 MOTION FOR ATTORNEYS'
FEES AND REIMBURSEMENT OF COSTS;
AND EXHIBITS**

Judge: Hon. William D. Claster
Dept.: CX101
Action Filed: December 6, 2019
Hearing Date: September 12, 2025
Hearing Time: 9:00 a.m.

1 **DECLARATION OF RANDY RENICK**

2 I, Randy Renick, hereby declare and say:

3 1. I am a partner at the law firm of Hadsell Stormer Renick & Dai LLP. I am an attorney
4 licensed to practice law in California and am admitted to the bar of this Court. I am counsel of record
5 for Plaintiffs in this action.

6 2. I have reviewed the documents identified herein and am fully familiar with the facts set
7 forth therein. Based on my own personal knowledge and on my familiarity with the documents,
8 pleadings and files in this action, I can state that the following information is true and accurate.

9 **Experience of Counsel**

10 3. Hadsell Stormer Renick & Dai LLP (“HSR&D”) and McCracken, Stemerman &
11 Holsberry, LLP are Class Counsel in this action. The qualifications of McCracken, Stemerman &
12 Holsberry, LLP are set forth separately in the Declaration of Sarah Grossman-Swenson.

13 4. My firm, Hadsell Stormer Renick & Dai LLP, has substantial litigation experience in
14 wage and hour class actions, and is fully familiar with the legal and factual issues in this case, having
15 handled dozens of wage and hour class actions as well as other types of class actions and complex
16 litigation.

17 5. I specialize in complex cases and class action litigation, including wage and hour,
18 antitrust, employment, civil rights and public interest litigation. I am a graduate of Southwestern School
19 of Law and have been specializing in complex litigation since 1995, first with Hadsell & Stormer, Inc.,
20 and from January 1, 2000 until December 31, 2007, with the Law Offices of Randy Renick. Since
21 January 1, 2008, I have been a partner with Hadsell Stormer Keeny Richardson & Renick, LLP, and its
22 successors Hadsell Stormer Richardson & Renick, LLP, Hadsell Stormer & Renick, LLP, and Hadsell
23 Stormer Renick & Dai LLP.

24 6. I was selected as a “Rising Star” by the Los Angeles Magazine and Law & Politics
25 Magazine for 2004 and have also been selected as a “Super Lawyers®” each year for the last 20 years.
26 I have been one of only a few plaintiff-side employment lawyers selected for inclusion on the “Best
27 Lawyers in America” list each year since 2007. In 2020 and 2025 I was named by Best Lawyers as
28 Lawyer of the Year Southern California for Litigation – Labor and Employment Pasadena. My C.V. is

1 attached hereto as Exhibit 2.

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

8 8. Cornelia Dai is a partner with Hadsell Stormer Renick & Dai LLP, and was formerly an
9 associate with Hadsell & Stormer, Inc. Ms. Dai's practice specializes in wage and hour class actions,
10 individual employment cases, and other civil rights and international human rights cases. She has
11 litigated numerous wage and hour class actions during her career, including *Wang v. Chinese Daily*
12 *News*, a class action in federal court involving violations of overtime and meal and rest break laws that
13 ultimately settled after more than 10 years of litigation. Ms. Dai was also one of the plaintiffs' counsel
14 in *South Central Farmers Feeding Families v. City of Los Angeles*, a case brought on behalf of over
15 300 low-income families in a struggle to preserve land for a much-needed urban community garden in
16 South Los Angeles. In addition, she was one of the Doe plaintiffs' counsel in the state litigation of the
17 international human rights case *Doe v. Unocal*.

18 9. Ms. Dai has been named to the Southern California Super Lawyers® list as a Rising Star
19 or Super Lawyer each year since 2005 and has been listed in The Best Lawyers in America every year
20 since 2012. For the years 2017, 2019, 2022, and 2023, she has been named Lawyer of the Year in
21 Southern California by Best Lawyers for Litigation - Labor and Employment (Pasadena). In 2018, she
22 was named Lawyer of the Year in Southern California by Best Lawyers for Employment Law –
23 Individuals (Pasadena). In addition, for the years 2023 to 2025, she was named to the Top 50: Women
24 Southern California Super Lawyers list, and for the years 2024 and 2025, she was named to the Top
25 100: Southern California Super Lawyers list. For the years 2022 to 2025, Ms. Dai has also been
26 selected as one of the Lawdragon 500 Leading Plaintiff Employment Lawyers. Ms. Dai was featured in
27 the July 2007 issue of Southern California Super Lawyers® - Rising Stars in an article entitled "For
28 Abusive Employers, The Dai Has Been Cast." Ms. Dai serves on the Board of the California

1 Employment Lawyers Association, the Executive Committee of the Los Angeles County Bar
2 Association's Labor and Employment Law section, and the Board of the Foundation for Advocacy,
3 Inclusion and Resources. In 2018, she published an article in the California Labor & Employment Law
4 Review on independent contractor misclassification, "*Dynamex Operations West., Inc. v. Superior*
5 *Court: Employee's Perspective*" (September 2018). Ms. Dai is frequently asked to speak on
6 employment and wage and hour topics by legal organizations and law schools. Ms. Dai is a 1995
7 graduate of U.C. Berkeley, and she earned her Juris Doctorate from U.S.C. Law School in 1999.

8 10. In pursuing this case aggressively from the outset, Class Counsel has demonstrated a
9 high degree of competence in the litigation of the claims at issue. Class Counsel's high-quality and
10 effective representation is further evidenced by Defendant's desire to mediate prior to protracted
11 motion work, including class certification. The settlement is fair and reasonable, and an adequate
12 resolution of the claims of the Settlement Class, and preferable to continued litigation.

13 11. Both of the firms representing the Class, McCracken, Stemerman & Holsberry, LLP and
14 Hadsell Stormer Renick & Dai, LLP, have extensive experience litigating on behalf of workers in
15 matters involving the City of Los Angeles' various living wage ordinances. The two firms served as
16 Class Counsel in the *City of Los Angeles Service Charge Cases*, in which they successfully defended
17 the constitutionality of the City's Service Charge Ordinance on behalf of workers from five airport-area
18 hotels. *See Garcia v. Four Points Sheraton LAX*, 188 Cal. App. 4th 36 (2010). Both firms have served
19 as counsel in dozens of similar class action cases involving airport and hospitality workers, including
20 *Aguilar v. Flying Foods Group Pacific, Inc.*, Los Angeles Superior Court Case No. BC 553539, which
21 involved a class of airline catering workers who alleged claims for unpaid overtime and other wage and
22 hour violations. Hadsell Stormer Renick & Dai LLP and McCracken, Stemerman & Holsberry, LLP are
23 two of the preeminent plaintiff-side employment and labor firms in California whose work in this
24 matter was of the highest caliber.

25 **Background and Work Performed**

26 12. In 2018, the voters of Anaheim adopted "Measure L," an ordinance requiring hospitality
27 industry employers to pay a living wage of \$15 per hour starting on January 1, 2019. Whether the
28 Defendants were required to comply with the City of Anaheim's Living Wage Ordinance ("LWO") and

1 pay Plaintiffs the living wage rate depended on whether Disney had an agreement with the City that
2 provides them with the right to a “City Subsidy,” which is defined as a right to a rebate of taxes. The
3 case turned on the 1996 Infrastructure and Parking Finance Agreement (“Finance Agreement”) between
4 Disney and the City of Anaheim, which provided Disney with, among other things, over \$240 million
5 in public funds for Disney to use to help construct California Adventure, Downtown Disney, and its
6 new parking garage, with money raised through the sale of municipal bonds by the City of Anaheim
7 Public Financing Authority (“Authority”) that Disney was permitted to pay back with its own future tax
8 revenues and a right to future reimbursement from the Disney taxes paid over by the City to the Trustee
9 if that tax money bond Disney routed through the City to the Trustee was not enough to cover payments
10 due on its bonds. To understand the intricacies of the complex financial arrangement between Disney
11 and the City of Anaheim required Class Counsel to spend substantial time and resources. It also
12 required legal expertise to understand and interpret complex business contract terms, which Counsel
13 has.

14 13. After interviewing Defendants’ employees and their wage statements, Plaintiffs and
15 Counsel determined that Defendants were paying employees in many job positions less than the hourly
16 wage rate required by the LWO. On December 6, 2019, Plaintiffs Kathleen Grace, Regina Delgado,
17 Alicia Grijalva, and Javier Terrazas (“Plaintiffs”)¹ filed a wage-and-hour class action against the
18 Disney Defendants and Sodexo Defendants, alleging that they had violated the LWO by failing to pay
19 their employees at the proper wage rate and owed the class of workers backpay as well as derivate
20 penalties under the California Labor Code.

21 14. On February 21, 2020, Disney Defendants filed a demurrer, joined by Sodexo
22 Defendants, arguing that the Living Wage Ordinance did not apply to Disney because they did not
23 receive a “City Subsidy,” defined as a “tax rebate” in the LWO. Due to Class Counsel’s compelling
24 legal analysis and unique ability to unpack the complicated financial arrangement to expose the right to
25 a tax rebate it provided, the Court overruled the demurrer on August 28, 2020. The Court held that
26

27 ¹ Plaintiff Thomas Bray was also named in the complaint, but subsequently withdrew as a class
28 representative and named plaintiff.

1 “even under the Disney Defendants’ definition [of a ‘rebate’], the Credit Enhancement Agreement
2 could be construed as creating a City Subsidy.” *Grace v. The Walt Disney Co.*, 93 Cal. App. 5th 549,
3 555 (2023) (quoting this Court’s decision overruling Defendants’ demurrer), rev. denied Oct. 25, 2023.

4 15. On April 30, 2021, the Disney Defendants filed their motion for summary judgment.
5 The Court granted the summary judgment motion on grounds that Disney was not an employer
6 covered by the LWO because the agreements between the Disney Defendants and the City did not give
7 the Disney Defendants a right to a rebate of taxes; any rights arising from the agreements were
8 contractual in nature, provided for abatement of debt service payments (not taxes), and did not set aside
9 any of Disney’s tax monies for reimbursement. Based on the Court’s holding that the LWO did not
10 cover Disney, the grant of summary judgment meant that Plaintiffs and the Class would receive nothing
11 in the action.

12 16. Plaintiffs appealed. The appeal presented an issue of first impression under California
13 statutory law—the meaning of “City Subsidy” and “a right to receive a rebate of . . . tax” in the LWO.
14 As a result of Counsel’s skill, ability, and persuasive lawyering, Plaintiffs obtained a full reversal of the
15 grant of summary judgment from the Court of Appeal. The July 13, 2023, decision was a complete
16 victory for Plaintiffs as the Court of Appeal not only granted a reversal, but also affirmatively held that
17 Defendants must comply with the LWO: “Disney receives a ‘City Subsidy’ within the meaning of the
18 LWO and is therefore required to pay its employees a living wage.” *Grace*, 93 Cal. App. 5th at p. 560.

19 17. It was also a victory for the entire class as the Court had granted Plaintiffs’ earlier
20 motion for class certification. Indeed, following the denial of Defendants’ petition for review, the
21 Parties agreed that Defendants’ liability under the Living Wage Ordinance was established by the Court
22 of Appeal decision. In addition, on October 29, 2023, the Disney Defendants began complying with the
23 LWO, paying their employees in compliance with the hourly wage rates set by the LWO. The Sodexo
24 Defendants began complying with the LWO on or about November 24, 2023. The Disney Defendants
25 also adjusted their service charge practices, so they are no longer retaining any portion of any service
26 charges but instead pay all service charges to employees.

27 18. After remand, the class was recertified with a stipulated amended class definition and
28 additional Class Members were served with Class Notice. As described more fully below, Plaintiffs

1 then spent considerable time seeking discovery regarding damages and preparing for mediation. Given
2 that the class was over 50,000 employees, they engaged an expert, Econ One Research, Inc. to assist in
3 running calculations based upon the massive amount of payroll and timekeeping data produced by
4 Defendants covering the time period since January 2019. Based on their longtime experience with
5 complex class actions, Class Counsel were able to develop a complete damage model with which they
6 were able to accurately value the class members' claims.

7 19. Class Counsel then made the strategic decision to participate in separate mediations with
8 the Disney Defendants and the Sodexo Defendants given that Defendants employed separate
9 employees. The first one was with the Disney Defendants before Judge Layn Phillips (ret.), and
10 involved two rounds of briefing in advance of the mediation on July 12, 2024. The parties accepted the
11 mediator's proposal on July 17, 2024.

12 20. While Plaintiffs and the Sodexo Defendants participated in a mediation on July 16,
13 2024, the matter did not resolve. The Sodexo Defendants then filed a motion for summary adjudication,
14 arguing a good faith defense and that Plaintiff Grace's claims were barred by the settlement of a
15 different class action. Plaintiffs filed their opposition to the summary adjudication motion on October
16 18, 2024. Shortly thereafter, Plaintiffs reached a settlement with the Sodexo Defendants on November
17 1, 2024.

18 **Lodestar**

19 21. The two settlements - \$233,000,000 from the Disney defendants and \$1,750,000 from
20 the Sodexo defendants - total \$234,750,000. The requested fee is \$35,212,500, or 15% of the settlement
21 funds. The lodestar for the two firms is \$6,059,605.00, resulting in a multiplier of 5.81.

22 22. While the Sodexo agreement provides for attorneys' fees up to 25%, Plaintiffs seek a fee
23 of only 15% to remain consistent with the Disney settlement.

24 23. Hadsell Stormer Renick & Dai has expended 2,908.9 attorney and paralegal hours since
25 the inception of this case which includes an additional 420 hours they expect to spend on meetings with
26 class members, preparing the motion for final approval, finalizing the motion for attorney's fees and
27 costs, resolving claims, and working with the claims administrator to ensure that the settlement amount
28 is properly allocated to class members and distributed to each class member. The total lodestar for my

firm including the additional hours is \$2,337,897.50. The total hours expended by McCracken, Stemerman & Holsberry, LLP are \$3,721,707.50.

24. The breakdown of the lodestar for each timekeeper at my firm is set forth below:

Timekeeper	Years of Experience	2025 Rate	Hours	Lodestar
Randy Renick, Partner	30	\$1,150.00	1183.6	\$1,361,140.00
Cornelia Dai, Partner	26	\$1,050.00	470.7	\$494,235.00
Sarah Cayer, Associate	5	\$650.00	256.8	\$166,920.00
Andrea Loera, Associate	4	\$600.00	48.9	\$29,340.00
Max Rosenfeld, Clerk	2	\$250.00	556.6	\$139,150.00
Maria Stroud, Senior Paralegal	25	\$375.00	392.3	\$145,112.50
Totals			2908.9	\$2,337,897.50

25. The chart was prepared from my firm's billing records, which will be lodged in report form for the Court's review in advance of the hearing. My firm's billing records were compiled by my firm's bookkeeper from time sheets filled out by the individual attorney or paralegal at or about the time the work was performed by recording the amount of time worked, broken down by 1/10 hour periods, or were entered in the computer system by the individual timekeeper. When the data was put on time sheets it was then entered on a weekly basis by staff into our computer system and recorded therein. On a monthly basis, the computer records are printed out, reviewed by the supervising partner for accuracy, and thereafter stored for each case in our office. These computer printouts constitute the standard billing records for this case, which are kept in the normal course of business.

26. My usual practice, and the usual practice of the other attorneys in my firm, is to record only those hours that my firm would customarily bill to a commercial client paying on an hourly basis. The time logs for this matter (including all billers) have been carefully reviewed, and any biller's time that may have been duplicative or inefficient is deleted from the billing records. While I exercised billing judgment after recording my time in this case and the time of other attorneys in my office (thus eliminating some of the time that had been originally recorded as an exercise of reasonable billing judgment), I also exercised billing judgment before recording my time, because I routinely did not enter time that I thought might be duplicative, and I reduced time for work that I thought may have been inefficient.

1 27. Throughout the course of the litigation, I have overseen the assignment of work to
2 attorneys and paralegals in my office so that the necessary work would be handled as efficiently as
3 possible by the lowest-billing member of the team who could feasibly, reliably, and efficiently perform
4 each task. I made every effort to litigate this action in an efficient and cost-effective manner by also
5 reducing duplication of effort.

6 28. This matter was taken on a purely contingent basis by my firm. The litigation of this
7 case precluded my firm from taking other cases. My firm has 18 lawyers and, as a result, the number of
8 cases my firm is able to take is limited, and my firm must be extremely selective about the cases that
9 we do take. My firm must regularly decline to take cases which it believes are meritorious and would
10 otherwise accept if not for the issue of staffing. Taking on larger class action cases, such as the present
11 case, utilizes a significant portion of my firm's staff and resources and prevents the firm from taking
12 cases which are likely to be equally or more remunerative than the present case. We took this matter on
13 a pure contingency basis, expending this effort without any guarantee of recovery. At various times, the
14 litigation has consumed a significant percentage of my time, along with that of my partner. My firm
15 declines to represent scores of individuals each month due in part to the need to focus on the
16 representation of existing clients.

17 29. In my experience, it is not uncommon for class actions to be litigated for many years due
18 to the inherent complexities of litigating on behalf of a class. Typically, class action wage and hour
19 cases such as this matter take 3 to 5 years to resolve. Many cases take even longer to resolve. For
20 example, in 2004, Plaintiffs filed suit on behalf of a class of hourly newspaper employees alleging
21 claims of unpaid overtime and other wage and hour violations in *Wang v. Chinese Daily News*, Case
22 No. CV-04-1498 CBM, United States District Court for the Central District of California. I joined the
23 case as lead trial counsel on behalf of the Plaintiff class in 2006. After a jury trial, a bench trial and
24 multiple appeals, Plaintiffs obtained a favorable judgment for more than \$5,200,000 in 2015—over a
25 decade after the case was filed. In 2007, I represented plaintiffs in a suit filed on behalf of a class of
26 hourly workers against one of several hotels for violation of a city service charge ordinance in *Lozano*
27 *v. Hilton Los Angeles Airport, et al.*, BC 377063, Superior Court of California for the County of Los
28 Angeles. It was heavily litigated with my firm successfully defending the underlying ordinance on

1 appeal in the published decision of *Garcia v. Four Points Sheraton LAX*, 188 Cal. App. 4th 364 (2010).
2 It ultimately settled on the eve of trial in 2013—six years after the lawsuit was filed.

3 Hourly Rates

4 30. I am also familiar with the kinds of fees charged to individual clients in contingency fee
5 arrangements in employment and wage and hour cases. Hadsell Stormer Renick & Dai LLP's standard
6 contingency agreement provides for a contingency payment to the firm of 40% of the gross settlement
7 amount. This is a standard term for plaintiff-side litigation firms in Los Angeles and the San Francisco
8 Bay Area. The rates sought here are the same rates charged to our hourly clients.

9 31. During my years of law practice, I have become familiar with the kind of fees that are
10 prevalent in successful contingent cases in California. While I have gained this knowledge in a variety
11 of ways, I have gathered most of my information about these matters in the course of preparing fee
12 motions for my own firm and for other attorneys who have requested my firm to submit fee
13 declarations in support of their motions. In this context, I have obtained numerous declarations from
14 attorneys knowledgeable about the rates charged by attorneys in the Los Angeles and the San Francisco
15 Bay Area legal markets and about the expected return for work done on cases in which any recovery of
16 a fee is contingent upon success on the merits.

17 32. I remain current on the rates charged by attorneys similar in stature and experience to
18 myself. My hourly rate as well as the rates for those working at my firm are consistent with the rates of
19 similarly experienced individuals in both the Northern and Southern California legal communities.

20 33. My current rate is \$1150 per hour. My 2024 rate of \$1100 per hour was approved by
21 United States District Court Judge Rita F. Lin in *Guzman v. Dow Agrosciences LLC*, Case No. 3:22-
22 CV-14962-RFL. My 2022 rate of \$925 per hour was approved by Los Angeles Superior Court Judge
23 Stuart M. Rice in *Espino v. Sky Chefs, Inc.*, Case No. 19STCV44265 and Orange County Superior
24 Court Judge Glenda Sanders in *Homeris v. Emcor Facilities Services Inc.*, Case No. 30-2020-
25 01136058.

26 34. My 2021 rate of \$900 per hour was approved on January 31, 2022, by United States
27 Chief Magistrate Judge Joseph C. Spero in *Craig v. Corteva, Inc.*, Case No. 3:19-cv-07923-JCS. My
28 2020 rate of \$875 per hour was approved on December 16, 2020, by United States District Court Judge

1 Jon Tigar in *Valliere v. Tesoro Refining and Marketing Company LLC*, Case No. 4:17-Cv-00123-JST,
2 and United States District Court Judge Michael W. Fitzgerald on August 24, 2020, in *Kendig v.*
3 *ExxonMobil Oil Corp.*, Case No. 2:18-cv-09224, and Los Angeles Superior Court Judge Amy Hogue in
4 *Clack v. Chevron Corporation*, Case No. BC 649514, on August 6, 2020. My hourly rate has been
5 consistently approved in class action cases by both state and federal courts over the past 15 years.

6 35. My 2018 hourly rate of \$825 was approved in three separate matters, including by San
7 Francisco Superior Court Judge Mary E. Wiss on October 3, 2018, in *In Re Urethanes*, CJC-04-
8 004367; United States District Court Judge Yvonne Gonzalez Rogers on March 6, 2018, in *Buzas v.*
9 *Phillips 66*, Case No. 4:17-cv-00163; and United States District Judge Maxine Chesney on January 18,
10 2019, in *Berlanga v. Equilon Enterprises*, Case No. 17-cv-00282. My 2017 rate of \$800 per hour was
11 approved by Los Angeles Superior Court Judge John Shepard Wiley in *Diaz et al. v. Accor Business*
12 *and Leisure North America, Inc.*, Case No. BC 621422 (Aug. 14, 2017).

13 36. My 2016 hourly rate of \$775 was approved by Los Angeles Superior Court Judge
14 Richard E. Rico in *Murphy v. CVS Caremark*, Case No. BC 464785. My 2015 hourly rate of \$750 was
15 approved by Judge Consuelo Marshall, United States District Court, Central District of California, in
16 *Wang v. Chinese Daily News*, Case No. CV-04-1498 (November 17, 2015), a wage and hour class
17 action. It was also approved by Judge Curtis Karnow, San Francisco Superior Court, in the matter of
18 *Harmon Press v. International Paper*, Case No. GC-04-432167, an antitrust class action. My 2014
19 hourly rate of \$675 was approved by Judge William F. Highberger, Los Angeles Superior Court, in
20 *Ochoa v. Brisam LAX*, Case No. BC 493242 (April 29, 2014), and in *Lozano v. Hilton Los Angeles*
21 *Airport*, Case No. BC 377063 (February 10, 2014). My 2013 hourly rate of \$650 was also approved by
22 Judge Richard Kramer, San Francisco Superior Court, in *In Re Urethane Cases*, J.C.C.P Case Number
23 4367, on June 25, 2013, and by United States District Court Judge Philip S. Gutierrez in *USW v.*
24 *ConocoPhillips Company*, CV 08-2068 (May 6, 2013).

25 37. My 2012 hourly rate of \$625 was also approved on multiple occasions, including by
26 Judge Richard Kramer, San Francisco Superior Court, in *Competition Collision v. Crompton*
27 *Corporation, et al.*, Case No. CGC-04-431278 (February 28, 2012). My rate was also approved by
28 Judge Jane Johnson, Los Angeles Superior Court, in two matters: *Barrientos v. Hilton Los Angeles*

1 *Airport*, Case No. BC403925 (March 6, 2012) and *Diaz v. ABM Industries*, Case No. BC 362932 (May
2 21, 2012). It was also approved by Judge Highberger in the related actions of *Waner v. Radisson Hotel*
3 *LAX*, Case No. BC 377065 (November 9, 2012), *Garcia v. Four Points Sheraton LAX*, Case No. BC
4 377059 (October 23, 2013), *Chavez v. Marriott LAX*, Case No. BC 377062 (January 7, 2013), and
5 *Chavez v. Renaissance Monturo Hotel Los Angeles*, Case No. BC 377060 (January 7, 2013). My 2012
6 hourly rate was also approved by Judge Rolf M. Treu, Los Angeles Superior Court, in *Parker v. Zima*
7 *Beauty Center, Inc.*, Case No. BC 392872 (November 5, 2012), and by Judge Nancy Wiebe Stock,
8 Orange County Superior Court, in *Andrade v. Terra Universal*, Case No. 00473739-CU-OE-CX (May
9 23, 2012).

10 38. My 2011 hourly rate of \$600 was approved by Judge Kramer in *In re Urethane Cases*,
11 J.C.C.P. No. 4367, and *Villa v. Crompton*, CGC-03-419116. My 2011 hourly rate was also approved by
12 Judge Susan Illston, United States District Court, Northern District of California, in *In Re: TFT-LCD*
13 *(Flat Panel), Antitrust Litigation*, Case No. MDL 3:07-md-1827. My 2010 hourly rate of \$600 was
14 approved by Judge Jacqueline Nguyen, United States District Court, Central District of California, in
15 *Morales v. Aramark Corp.*, Case No. 2:09-cv-05565. My 2009 hourly rate of \$550 was approved by
16 Judge Yvette M. Palazuelos, Los Angeles Superior Court, in *De La Rosa v. ICC Collision Centers*,
17 Case No. BC 389024, and by Judge Richard Kramer, San Francisco Superior Court, in the *Label Stock*
18 *Cases*, J.C.C.P. Nos. 4314, 4318 and 4326.

19 39. Cornelia Dai has been a partner at the firm since 2010, and she was previously an
20 associate with the firm from 2000 to 2009. Her current rate is \$1050 per hour. Her 2024 rate of \$1000
21 per hour was approved by United States District Court Judge Rita F. Lin in *Guzman v. Dow*
22 *Agrosciences LLC*, Case No. 3:22-CV-14962-RFL.

23 40. Her 2022 rate of \$825 per hour was approved by Los Angeles Superior Court Judge
24 Stuart M. Rice in *Espino v. Sky Chefs, Inc.*, Case No, 19STCV44265 and Orange County Superior
25 Court Judge Glenda Sanders in *Homer v. Emcor Facilities Services Inc.*, Case No. 30-2020-
26 01136058. Her 2021 rate of \$800 per hour was approved on January 31, 2022, by United States Chief
27 Magistrate Judge Joseph C. Spero in *Craig v. Corteva, Inc.*, Case No. 3:19-cv-07923-JCS. Ms. Dai's
28 2020 rate of \$775 per hour was approved on December 16, 2020, by United States District Court Judge

1 Jon Tigar in *Valliere v. Tesoro Refining and Marketing Company LLC*, Case No. 4:17-Cv-00123-JST,
2 and United States District Court Judge Michael W. Fitzgerald on August 24, 2020, in *Kendig v.*
3 *ExxonMobil Oil Corp.*, Case No. 2:18-cv-09224 and Los Angeles Superior Court Judge Amy Hogue in
4 *Clack v. Chevron Corporation*, Case No. BC 649514, on August 6, 2020. Her hourly rate has been
5 consistently approved in class action cases by both state and federal courts over the past 10 years. Her
6 2018 rate of \$725 per hour was approved by Judge Yvonne Gonzalez Rogers, United States District
7 Court, Northern District on March 8, 2018, in *Buzas v. Phillips 66 Company*, Case No. 4:17-cv-00163,
8 and by Judge Maxine Chesney, United States District Court, Northern District, on January 18, 2019, in
9 *Berlanga v. Equilon Enterprises*, Case No. 17-cv-00282.

10 41. Her 2017 rate of \$700 per hour was approved by Los Angeles Superior Court Judge
11 John Shepard Wiley in *Diaz et al. v. Accor Business and Leisure North America, Inc.*, Case No. BC
12 621422 (Aug. 14, 2017). Ms. Dai's 2016 hourly rate of \$675 was recently approved by Los Angeles
13 Superior Court Judge Richard E. Rico in *Murphy v. CVS Caremark*, Case No. BC 464785. Her 2015
14 hourly rate of \$650 was approved by Judge Consuelo B. Marshall, United States District Court, Central
15 District of California, in *Wang v. Chinese Daily News*, Case No. CV-04-1498 (November 17, 2015).
16 Her 2014 hourly rate of \$600 was approved by Judge William F. Highberger, Los Angeles Superior
17 Court, in *Ochoa v Brisam LAX*, Case No. BC 493242 (April 29, 2014), and in *Lozano v. Hilton Los*
18 *Angeles Airport*, Case No. BC 377063 (February 10, 2014). Her 2013 hourly rate of \$575 was also
19 approved by Judge Philip S. Gutierrez, United States District Court, Central District of California, in
20 *USW v. ConocoPhillips Company*, CV 08-2068 (May 6, 2013). Her 2012 hourly rate of \$550 was
21 approved by Judge Jane Johnson, Los Angeles Superior Court, in *Diaz v. ABM Industries*, Case No. BC
22 362932 (May 21, 2012). It was also approved by Judge William F. Highberger, Los Angeles Superior
23 Court, in the related actions of *Waner v. Radisson Hotel LAX*, Case No. BC 377065 (November 9,
24 2012), *Garcia v. Four Points Sheraton LAX*, Case No. BC 377059 (October 23, 2013), *Chavez v.*
25 *Marriott LAX*, Case No. BC 377062 (January 7, 2013), and *Chavez v. Renaissance Montura Hotel Los*
26 *Angeles*, Case No. BC 377060 (January 7, 2013). It was also approved by Judge Nancy Wieben Stock,
27 Orange County Superior Court, in *Andrade v. Terra Universal*, Case No. 00473739-CU-OE-CX (May
28 23, 2012).

42. Maria Stroud is a paralegal with over 20 years of experience working on class actions and other complex matters. As a result of her many years of experience, she is able to handle many tasks in class action cases which associates would otherwise have to perform. Ms. Stroud's hourly rate is \$375. Her 2021 rate of \$300 per hour was approved on January 31, 2022, by United States Chief Magistrate Judge Joseph C. Spero in *Craig v. Corteva, Inc.*, Case No. 3:19-cv-07923-JCS. Her hourly rate of \$300 was approved by Judge Michael W. Fitzgerald, United States District Court, Central District, on August 24, 2020, in *Kendig v. ExxonMobil Oil Corp.*, Case No. 2:18-cv-09224; Los Angeles Superior Court Judge Amy Hogue in *Clack v. Chevron Corporation*, Case No. BC 64951, on August 6, 2020; Judge Maxine Chesney, United States District Court, Northern District, on January 18, 2019 in *Berlanga v. Equilon Enterprises*, Case No. 17-cv-00282; and Judge Yvonne Gonzalez Rogers, United States District Court, Northern District, on March 8, 2018, in *Buzas v. Phillips 66 Company*, Case No. 4:17-cv-00163.

The Lodestar Is Reasonable

43. The number of hours expended by Class Counsel and the hourly rates of the attorneys who worked on this case are reasonable. The hours can be divided into the following five time frames:

- a. Initiating Lawsuit and Opposing Demurrer (January 2019 to March 2021)
- b. Opposing Summary Judgment and Seeking Class Certification (April 2021-December 2021)
- c. Filing Appeal and Opposing Petition for Review (January 2022-October 2023)
- d. Discovery, Opposing Sodexo's Motion for Summary Adjudication, and Mediation (November 2023-December 2024)
- e. Settlement and Court-Approved Process (January 2024-present)

A detailed description of the work performed during each of the five periods is set forth below.

44. Initiating Lawsuit and Opposing Demurrer. From January 2019 to March 2021, Class Counsel expended 553.5 hours total. During this time, Hadsell Stormer Renick & Dai LLP ("HSR&D") expended 172 hours on the following tasks: Interviewing class members, investigating the legal and factual theories, editing the Complaint and Opposition to the demurrer, and commencing discovery.

1 45. When the LWO became effective in January 2019, Class Counsel was contacted by
2 employees who worked for Defendants and their unions regarding the LWO. Over the months that
3 followed, HSR&D had numerous conversations with employees and reviewed their wage statements,
4 Defendants' pay policies, and other employment-related documents while MSH engaged in extensive
5 analysis of the complex financial arrangement between Disney and the City of Anaheim from 1996,
6 comprised of several agreements. Both firms conducted thorough research of the LWO and related
7 wage and hour violations. HSR&D met on a number of occasions with the named plaintiffs and assisted
8 in drafting the complaint.

9 46. On December 6, 2019, Plaintiffs filed the class action complaint on behalf of a class of
10 workers against the Disney Defendants and the Sodexo Defendants alleging violation of the LWO, the
11 Labor Code section 203 (waiting time penalties), Labor Code sections 510, 1194 and 1198 (overtime
12 wages), Business and Professions Code section 17200 (UCL), and Labor Code section 2698 (PAGA).

13 47. On February 21, 2020, the Disney Defendants filed their demurrer, which the Sodexo
14 Defendants joined, claiming that Disney was not an "employer" under the LWO because it did not
15 receive a "tax rebate" from the City of Anaheim. The demurrer required extensive research by both
16 firms regarding statutory interpretation and further review of the financial agreements between Disney
17 and the City. HSR&D assisted Mr. McCracken in drafting the opposition to the demurrer, which was
18 filed on March 23, 2020. The Court overruled the demurrer on August 28, 2020.

19 48. Plaintiffs devised a class action discovery plan, focused initially on interpreting the
20 policies and practices governing complex financial transactions between Disney, the City of Anaheim,
21 Anaheim Public Financing Authority, and a bond trustee. Over the several months that followed, the
22 parties engaged in extensive discovery requiring substantial meeting and conferring. In October and
23 November 2020, Plaintiffs served written discovery, including special interrogatories and requests for
24 production of documents, to the Disney Defendants and the Sodexo Defendants and subpoenaed
25 documents from third-party City of Anaheim. Defendants responded and produced tens of thousands of
26 pages of documents, including wage statements, grievances, communications, personnel documents of
27 the named plaintiffs, financial documents and agreements, collective bargaining agreements, and
28 employment policies, which HSR&D assisted with reviewing. The City of Anaheim also responded and

1 produced hundreds of pages of documents relating to the Disney financial agreements with the City at
2 issue in the case. Plaintiffs then took a person most qualified (“PMQ”) deposition of the City of
3 Anaheim regarding the documents produced on February 17, 2021. The Disney Defendants also served
4 special interrogatories and requests for production of documents. Counsel had numerous conversations
5 with the named plaintiffs to obtain documents and information to respond to the requests.

6 49. In March 2021, Plaintiffs issued a deposition subpoena to third-party Bank of New York
7 Mellon Trust Company NA related to the structure of the Indenture of Trust between the Anaheim
8 Public Financing Authority and BNY Western Trust Company, as well as first and second supplemental
9 indentures. The documents had to do with how BNY allocated revenues, principal, and interest to the
10 1997, 2007, and 2019 bonds. Plaintiffs engaged in substantial meeting and conferring with BNY prior
11 to the production of documents.

12 50. Continued Discovery, Opposing Summary Judgment and Seeking Class Certification.
13 From April 2021 to December 2021, Class Counsel expended 683.7 hours total. Hadsell Stormer
14 Renick & Dai, LLP spent 87.3 hours on the following tasks: Conducting informal and formal
15 discovery, opposing summary judgment, seeking class certification, and providing class notice.

16 51. During this time, Counsel continued to gather information and documents to respond to
17 Defendants’ discovery requests and to seek discovery from the Defendants. We spoke to the named
18 plaintiffs, gathered evidence, performed targeted research on class certification issues, and drafted their
19 class certification motion and supporting documents. In addition, we followed up with additional
20 discovery to Disney in June 2021, including additional requests for production of documents, form
21 interrogatories, and requests for admissions to Disney, and negotiated a stipulation regarding the
22 authenticity of documents.

23 52. Plaintiffs’ counsel also researched the factual and legal issues raised by the Disney
24 Defendants in their motion for summary judgment in support of the argument that no agreement
25 between the Disney Defendants and the City provided Disney with a right to a rebate of taxes. To
26 prepare for the filing of their class certification motion and the opposition to Defendants’ motion for
27 summary judgment, HSR&D reviewed the hundreds of thousands of pages of documents produced by
28 Defendants and the City of Anaheim. We met and conferred with Defendants about PMQ depositions

1 of Disney and Sodexo and stipulations regarding aspects of class certification. HSR&D reviewed and
2 edited the motion for class certification, which MSH took the lead on drafting.

3 53. After Plaintiffs filed their motion for class certification on May 10, 2021, the parties
4 continued to engage in critical discovery, both sides taking key depositions. I met with the named
5 plaintiffs and helped prepare them for their depositions, which Defendants took in May and June 2021.
6 Ms. Grossman-Swenson and I alternated defending these depositions. Plaintiffs sought further
7 documents from the City of Anaheim regarding the multiple agreements comprising its complex
8 financial agreement with Disney reached in 1996. Plaintiffs also followed up with additional discovery
9 to Disney regarding the Anaheim Public Financing Authority's financial indentures with third-party
10 BNY in June 2021, including additional requests for production of documents, form interrogatories,
11 and requests for admissions to Disney, and negotiated a stipulation regarding the authenticity of
12 documents.

13 54. After a thorough review of the voluminous production, Plaintiffs took the second
14 deposition of a City of Anaheim employee, the Finance Department Budget Supervisor D'Anne Lee, on
15 July 8, 2021.

16 55. After an extensive meet and confer between the parties regarding Plaintiffs' class
17 certification motion, the parties were able to reach a stipulation whereby Plaintiffs agreed to dismiss
18 one of the five named plaintiffs and Defendants agreed not to oppose the motion. Counsel drafted a
19 Plan of Class Action Notice, Class Notice and Exclusion Form, provided to Defendants for review and
20 submitted them to the Court. On August 13, 2021, the Court approved the Plan of Notice. They then
21 effectuated notice to the more than 25,000 Disney class members and the almost 300 Sodexo Class
22 Members on September 10, 2021.

23 56. Given the complexities of the agreements comprising the financial agreement at issue,
24 and the multi-layered legal arguments presented by Defendants' motion for summary judgment,
25 substantial legal research and analysis as well as marshalling of evidence was required for Plaintiffs to
26 structure and draft their opposition brief, separate statement, and other supporting documents. After
27 filing their opposition papers on September 17, 2021, Plaintiffs carefully reviewed the reply brief filed
28 by Defendants and spent considerable time preparing and presenting oral argument at the hearing on

October 29, 2021. The Court did not, however, agree with Plaintiffs' arguments, and it granted Defendants' motions for summary judgment, entering Judgment on December 16, 2021.

57. Filing Appeal and Opposing Petition for Review. From January 2022 to October 2023, Class Counsel expended 708.4 hours total. Hadsell Stormer Renick & Dai, LLP expended 81 hours on the following tasks: editing and briefing the appeal and the Opposition to the petition for review.

58. Plaintiffs filed their Notice of Appeal on January 5, 2022. The briefing on appeal required extensive time addressing each argument raised by Defendants below and the grounds ruled on by the Court in granting summary judgment. Ms. Dai worked closely with MSH on the research and drafting of Appellants' Opening Brief. Given the intricacies of the financial arrangement, careful attention was required to describe the various agreements that comprised the arrangement and clearly presenting Plaintiffs' legal arguments in Appellants' Opening Brief, which was filed with a seven-volume appendix containing over 4,000 pages on July 22, 2025. HSR&D also assisted with reviewing and analyzing Defendants filed Appellees' Brief on October 21, 2022, and conducting additional research to file Appellants' Reply Brief and appendix on November 21, 2022. At the invitation of the court, Plaintiffs also filed a supplemental brief regarding their request for judicial notice of ballot materials on May 8, 2023.

59. On July 13, 2023, the Court of Appeal issued an opinion reversing the grant of summary judgment and holding that Disney received a City Subsidy under the LWO and was required to pay its employees the living wage. Following the decision, Plaintiffs and Class Counsel immediately began pursuing the next steps to prosecute the case, engaging in strategy sessions, communicating with the named plaintiffs, and conducting legal research.

60. Then, on August 18, 2023, the Disney Defendants filed a petition for review presenting the issue for review of whether every payment made by a tax-collecting entity is a tax rebate. Class Counsel carefully reviewed and analyzed the issue presented and the arguments made in the petition, and SR&D participated in preparing an Answer. On October 25, 2023, the California Supreme Court denied review.

61. Post-Remand: Discovery, Opposing Sodexo's Motion for Summary Adjudication, and Mediation. From November 2023 to December 2024, Class Counsel expended 2169.9 hours total.

Hadsell Stormer Renick & Dai, LLP expended 1032 hours on the following tasks: amending complaint; providing notice; conducting discovery regarding damages; participating in mediation; opposing Sodexo's motion for summary adjudication; and preparing a class action approval motion.

62. As the matter was on appeal for a year and a half, Plaintiffs and Counsel conducted research and took steps to make certain the complaint and class definition were updated based on new developments in the law and the increased class period. After conferring with Defendants and obtaining their agreement, Plaintiffs filed a First Amended Complaint adding a claim for violation of Labor Code section 226 on December 1, 2023, seeking statutory penalties and PAGA penalties for alleged wage statement violations, based on new authority from the California Supreme Court which had been issued while Plaintiffs' case was on appeal. Plaintiffs also submitted an amended PAGA notice to the LWDA. Plaintiffs also drafted and presented an amended class definition for the Class Notice and plan for an updated notice to be provided to additional Class Members who did not previously receive Class Notice, which Defendants did not oppose. The Court approved the amended class definition for recertification, and additional Class Members were served with Class Notice. After Defendants produced the class data, I worked closely with the Administrator and Defendants to make certain that any additional class members were identified. On February 16, 2024, Class Notice was provided to the additional Class Members, which included over 25,000 individuals.

63. Plaintiffs and the Disney Defendants conducted extensive discovery related to damages during this time. On January 10, 2024, HSR&D prepared and Plaintiffs served discovery requests seeking class information, time records, payroll records, related pay and timekeeping systems, pay and timekeeping policies, and collective bargaining agreements reflecting wage rates. Plaintiffs also sought discovery from the Sodexo Defendants, including payroll data, information regarding collective bargaining agreements, and other follow-up and updated discovery based on Sodexo's prior productions in late 2020 and early 2021. Plaintiffs engaged a well-respected economic expert, Dr. Phillip Johnson of Econ One, to assist with organizing and performing calculations on the five years of voluminous data produced by the Defendants for the more than 50,000 Disney Class Members and the more than 500 Sodexo Class Members, which included more than 36 million lines of data in Disney's Payroll data alone. The production also included extensive termination, 401k, and service charges data.

1 64. Plaintiffs and the Disney Defendants then agreed to mediate with the Honorable Layn
2 Phillips (Ret.) in July 2024. In preparation for mediation, Ms. Grossman-Swenson and I spent
3 considerable time developing a complete damage model to determine the amount of wages, statutory
4 penalties, Private Attorneys General Act penalties, and interest that might be recovered at trial. For the
5 claims against Disney, this model also included wages for the categories of 401(k) payments and
6 service charges. Counsel worked with their expert Econ One to calculate damages based on the massive
7 amount of payroll and timekeeping data produced. For each Class Member, the model considered the
8 shifts worked during the class period, the appropriate rate of pay, and the rate actually paid. When
9 applicable, it also included the 401(k) matching contribution made and what should have been made if
10 proper LWO rates had been paid, as well as the service charge amounts actually paid and what should
11 have been paid under the LWO. In addition, the model was used to calculate the interest accrued on
12 each of the categories of damages. Finally, the model included a valuation of the penalties that might be
13 available on each claim. Based on the model, Plaintiffs were able to accurately value the maximum
14 value of their claims. Plaintiffs and Disney exchanged thoroughly researched opening and reply briefs
15 addressing the relevant factual and legal issues in advance of the mediation with Judge Phillips, which
16 took place on July 12, 2024. Pursuant to a mediator's proposal, Plaintiffs reached a settlement in
17 principle with the Disney Defendants on July 17, 2024.

18 65. Plaintiffs and the Sodexo Defendants participated in a mediation with Steve Pearl on
19 July 16, 2024, and Plaintiffs were able to utilize the model they set up for the Disney case to analyze
20 the much smaller amount of data for Sodexo. HSR&D drafted and edited the briefing, which was
21 limited to a single brief. As the matter did not resolve at mediation, Plaintiffs continued to pursue
22 discovery from Sodexo regarding its payroll data and alleged good faith defense to the penalties sought
23 by Plaintiffs. On August 27, 2024, the Sodexo Defendants filed a motion for summary adjudication,
24 arguing that the good faith defense barred Plaintiffs' waiting time and wage statement statutory claims
25 for statutory and PAGA penalties even after the Court of Appeal's decision on July 13, 2023, and that
26 Plaintiff Grace's claims were also barred because of the settlement of a different class action against
27 Sodexo of which she was a class member. HSR&D conducted research and pursued discovery from
28 Sodexo regarding their defenses, extensively edited the opposition briefing, and filed their opposition to

1 the summary adjudication motion on October 18, 2024. After Plaintiffs filed their opposition, the
2 parties continued to engage in settlement negotiations through the mediator. Pursuant to a mediator's
3 proposal, Plaintiffs reached a settlement in principle with the Sodexo Defendants on October 30, 2024.
4 The parties executed a Term Sheet containing all material points of the settlement. They then engaged
5 in negotiations of a long form settlement agreement.

6 66. From July 17, 2024, to December 13, 2024, Plaintiffs and the Disney Defendants
7 negotiated and then executed a long form settlement agreement entitled Class Action Settlement
8 Agreement which included the Class Notice. HSR&D spent substantial time reviewing the settlement
9 terms and preparing for, researching, and drafting their motion for preliminary approval of the
10 settlement on December 13, 2024. Plaintiffs and the Disney Defendant also stipulated to Plaintiffs'
11 filing of a Second Amended Complaint.

12 67. Settlement and Court-Approved Process. From January 2025 to July 14, 2025, Class
13 Counsel expended 1580.7 hours total. Of that amount, Hadsell Stormer Renick & Dai LLP expended
14 1116.6 hours on the following tasks: settlement administration, meetings and communication with
15 Class Members regarding the settlement administration and claims process and preparing class action
16 approval motions. My firm anticipates spending an additional 420 hours on this matter for final
17 approval, administration of the settlement, and distribution of the settlement funds to the more than
18 50,000 class members. MSH anticipates spending an additional 300 hours.

19 68. On January 17, 2025, the Court held a hearing regarding the Disney Settlement and
20 confirmed its tentative ruling continuing the hearing on the preliminary approval motion to permit the
21 parties to address the Court's queries regarding the dispute and administration process and scope of the
22 settlement release. The parties negotiated those changes and submitted a joint supplemental response to
23 the Court on February 21, 2025. Thereafter, the Court granted Preliminary Approval of the Settlement
24 Agreement on March 25, 2025. After HSR&D spent significant time working with the Class
25 Administrator to confirm contact information for the Class Members data and the process for the
26 Notice, which included creation of settlement website, with links for individual class members to
27 update contact information, elect method of payment, and request exclusion, notice was completed by
28 electronic and US Mail on June 3, 2025.

69. After months of negotiations, on May 2, 2025, Plaintiff and the Sodexo Defendants executed a long form settlement agreement entitled Class Action Settlement Agreement which included the Class Notice. HSR&D spent substantial reviewing the settlement terms and preparing for and drafting their motion for preliminary approval of the settlement, filed on March 27, 2025. On May 2, 2025, the Court held a hearing and granted Plaintiff's motion for preliminary approval after Counsel orally addressed the concerns raised in the Court's tentative ruling. The Court further ordered Plaintiff to submit a revised proposed order, which the Court signed on May 8, 2025. After HSR&D spent significant time working with the Class Administrator to confirm the contact information for the Class Members data and the process for the Notice, which included creation of settlement website with links to update contact information, elect method of payment, request exclusion, etc., notice was emailed and mailed to the Class on June 2, 2025.

70. Once the Court granted preliminary approval of the Settlements, Counsel has worked closely with their expert Econ One and the Settlement Administrator to ensure that the calculations of each individual Class Member's share of the Disney Settlement and of the Sodexo Settlement were accurately determined. In addition, Counsel has spent considerable time since holding both in-person and virtual meetings with Class Members and responding to inquiries to be certain they understand the settlement terms and the notice and claims process. Counsel has also established a hotline hosted by HSR&D staff for Class Members to call with any questions they have regarding their individual settlement share. Maria Stroud and Max Rosenfeld have spoken with hundreds of Class Members, and I have addressed Class Members' more complicated concerns as they have arisen. In addition to drafting the motions for preliminary approval and addressing the Court's related questions and concerns, HSR&D has also prepared the instant motion for attorneys' fees and costs. Counsel will continue to work on the matter, performing various tasks including drafting the motions for final approval, handling the final approval hearing, and working with the Settlement Administrator to ensure that payments to the Class Members are completed properly and expediently.

Costs

71. To date, Hadsell Stormer Renick & Dai has advanced costs of \$216,892.77 in this litigation. These costs are typically and customarily charged to clients. All of the charges described

herein were on behalf of Plaintiffs on a contingent basis and have not been reimbursed. These costs are reflected in the books and records of Hadsell Stormer Renick & Dai LLP. I have reviewed the expenses reported in this case that are included in Plaintiffs' Motion for Attorneys' Fees and Reimbursement of Costs, and I affirm that they are true and accurate. The totals for each category are set forth below:

Computer Services	\$10,004.90
Computer Services	\$ 370.50
Copying Cost	\$ 370.50
Court Costs/Filing Fees	\$4,249.36
Expert Fees ²	\$154,213.43
Mediation	\$37,500.00
Postage/Delivery Fees	\$58.07
Transcripts	\$ 871.80
Travel	<u>\$ 9,254.21</u>
Total	\$ 216,892.77

72. Further detail for the costs incurred is set forth in Exhibit 1, which is a true and correct copy of Hadsell Stormer Renick & Dai's Itemization of Costs in this matter. McCracken, Stemerman & Holsberry, LLP's costs are set forth in the Declaration of Sarah Grossman-Swenson and amount to \$213,140.08. The total costs for the two firms are \$430,032.85. I expect the two firms to incur an additional \$30,000 in costs, primarily for experts related to the final calculation of the class allocation for a total of \$460,032.85 in unreimbursed costs. We will provide details on any additional costs incurred prior to the Hearing on the Reimbursement of Costs.

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² Plaintiffs' Counsel retained fee experts Richard M. Pearl and Professor Charles Silver; no reimbursement is sought from the Court or the settlement funds for their expert fees.

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74. As for the Sodexo Settlement, the average total recovery per class member for all 547 Class members, including all categories of backpay, interest, and penalties, is \$2,398. The largest total recovery is \$17,800. For the 544 Class members with back wage claims, the average wage claim with interest is \$2,116.

/s/ *Randy Renick*
Randy Renick

DECLARATION OF RANDY RENICK

EXHIBIT 1

Date	Detail	Amount	
7/21/2021	Logikcull -project hosting	\$ 250.88	Computer Services
7/21/2021	Logikcull -project hosting	\$ 250.41	Computer Services
07/21/21	Logikcull -project hosting	\$ 250.88	Computer Services
07/21/21	Logikcull -05/18/21	\$ 250.41	Computer Services
8/31/2021	Logikcull -project hosting	\$ 503.12	Computer Services
11/04/21	Logikcull -project hosting	\$ 250.00	Computer Services
11/8/2021	Logikcull -project hosting	\$ 250.00	Computer Services
01/06/22	Logikcull -project hosting	\$ 250.00	Computer Services
03/08/22	Logikcull -project hosting	\$ 250.00	Computer Services
4/12/2022	Logikcull -project hosting	\$ 250.00	Computer Services
4/15/2022	Logikcull -project hosting	\$ 250.00	Computer Services
04/19/22	Logikcull -project hosting	\$ 250.00	Computer Services
6/7/2022	Logikcull -project hosting	\$ 250.00	Computer Services
7/12/2022	Logikcull -project hosting	\$ 250.00	Computer Services
08/08/22	Logikcull -project hosting	\$ 125.00	Computer Services
09/08/22	Logikcull -project hosting	\$ 125.00	Computer Services
10/25/22	Logikcull -project hosting	\$ 125.00	Computer Services
11/17/22	Logikcull -project hosting	\$ 125.00	Computer Services
12/16/22	Logikcull -project hosting	\$ 125.00	Computer Services
01/20/23	Logikcull -project hosting	\$ 125.00	Computer Services
3/9/2023	Logikcull -project hosting	\$ 125.00	Computer Services
4/13/2023	Logikcull -project hosting	\$ 125.00	Computer Services
05/04/23	Logikcull -project hosting	\$ 125.00	Computer Services
06/02/23	Logikcull -project hosting	\$ 125.00	Computer Services
12/16/23	Logikcull -project hosting	\$ 125.00	Computer Services
01/22/24	Logikcull -project hosting	\$ 125.00	Computer Services
01/29/24	Logikcull -project hosting	\$ 125.00	Computer Services
02/15/24	Logikcull -project hosting	\$ 125.00	Computer Services
2/26/2024	Logikcull -project hosting	\$ 300.00	Computer Services
3/28/2024	Logikcull -project hosting	\$ 300.00	Computer Services
5/7/2024	Logikcull -project hosting	\$ 300.00	Computer Services
6/13/2024	Logikcull -project hosting	\$ 300.00	Computer Services
7/11/2024	Logikcull -project hosting	\$ 955.00	Computer Services
7/25/2024	Logikcull -project hosting	\$ 330.00	Computer Services
10/18/2024	Info Track Invoice	\$ 69.20	Computer Services
10/18/24	Logikcull -project hosting	\$ 330.00	Computer Services
11/19/24	Logikcull -project hosting	\$ 330.00	Computer Services
12/18/24	Logikcull -project hosting	\$ 330.00	Computer Services
1/20/2025	Logikcull -project hosting	\$ 330.00	Computer Services
02/18/25	Logikcull -project hosting	\$ 125.00	Computer Services

Computer Services	\$ 10,004.90
Computer Services	\$ 370.50
Copying Cost	\$ 370.50
Court Costs/Filing Fees	\$ 4,249.36
Expert Fees	\$ 154,213.43
Mediation	\$ 37,500.00
Postage/Delivery Fees	\$ 58.07
Transcripts	\$ 871.80
Travel	\$ 9,254.21
Total	\$ 216,892.77

03/17/25	Logikcull -project hosting	\$ 125.00	Computer Services
4/7/2025	Logikcull -project hosting	\$ 125.00	Computer Services
5/12/2025	Logikcull -project hosting	\$ 125.00	Computer Services
6/6/2025	Logikcull -project hosting	\$ 125.00	Computer Services
12/31/19	Monthly Photocopying-Downstairs copier	\$ 48.90	Copying Cost
01/31/20	Monthly Photocopying-downstairs copier	\$ 4.50	Copying Cost
02/26/21	Monthly Photocopying-downstairs copier	\$ 15.30	Copying Cost
04/30/21	Monthly Photocopying-downstairs copier	\$ 1.20	Copying Cost
06/04/21	Monthly Photocopying-Downstairs copier	\$ 205.20	Copying Cost
07/30/21	Monthly Photocopying-downstairs copier	\$ 11.10	Copying Cost
09/30/21	Monthly Photocopying-downstairs copier	\$ 7.20	Copying Cost
11/17/21	Monthly Photocopying-Downstairs copier	\$ 59.70	Copying Cost
01/27/22	Monthly Photocopying-Downstairs copier	\$ 3.90	Copying Cost
03/29/24	Monthly Photocopying-downstairs copier	\$ 13.50	Copying Cost
12/06/19	LWDA - filing fees Grove v Walt Disney	\$ 75.00	Court Costs/Filing Fees
12/10/19	One Legal - Complaint filing fee/civil case	\$ 1,447.20	Court Costs/Filing Fees
12/10/19	One Legal - Complaint filing fee/civil case	\$ 164.20	Court Costs/Filing Fees
12/10/19	One Legal - process service	\$ 14.20	Court Costs/Filing Fees
1/2/2020	ACCT# ***5409 INVOICE # 12198857 MEASURE L PROOF OF SERVICE OF SUMMONS	\$ 0.55	Court Costs/Filing Fees
1/9/2020	ACCT# ***5409 INVOICE # 12205142 MEASURE L PROOF OF SERVICE OF SUMMONS, ETC.	\$ 31.00	Court Costs/Filing Fees
1/9/2020	ACCT# ***5409 INVOICE # 12202647 MEASURE L PROOF OF SERVICE	\$ 14.20	Court Costs/Filing Fees
1/9/2020	ACCT# ***5409 INVOICE # 12210399 MEASURE L PROOF OF SERVICE	\$ 35.25	Court Costs/Filing Fees
1/9/2020	ACCT# ***5409 INVOICE # 12210396 MEASURE L DECLARATION OF MAILING	\$ 35.50	Court Costs/Filing Fees
1/9/2020	ACCT# ***5409 INVOICE # 12204248 MEASURE L DECLARATION OF MAILING OR INABILITY TO ASCERTAIN ADDRESS	\$ 14.20	Court Costs/Filing Fees
1/9/2020	ACCT# ***5409 INVOICE # 12204154 MEASURE L PRROF OF SERVICE	\$ 14.20	Court Costs/Filing Fees
1/9/2020	MEASURE L - ACCT# *0296 INVOICE # 5184679 MESSENGER FEES	\$ 89.75	Court Costs/Filing Fees
1/9/2020	MEASURE L - ACCT# *0296 INVOICE # 5184680 MESSENGER FEES	\$ 45.00	Court Costs/Filing Fees
2/4/2020	MEASURE L INVOICE # 14231932	\$ 14.20	Court Costs/Filing Fees
2/4/2020	MEASURE L INVOICE # 12207636	\$ 35.50	Court Costs/Filing Fees
2/4/2020	MEASURE L INVOICE # 12207647	\$ 35.50	Court Costs/Filing Fees
2/10/2020	MEASURE L SERVICE OF SUMMONS AND COMPLAINT	\$ 179.50	Court Costs/Filing Fees

03/09/20	AMEX -RR Opposing counsel superior court	\$ 7.50	Court Costs/Filing Fees
5/13/2021	MEASURE L INVOICE # 219095 ACCESS FEE & DOC SERVICE FEE	\$ 116.40	Court Costs/Filing Fees
7/27/2021	MEASURE L ACCOUNT # ***5409 INVOICE # 13105729 MEASURE L PLTF'S PROPOSED PLAN OF NOTICE	\$ 41.00	Court Costs/Filing Fees
7/27/2021	MEASURE L ACCOUNT # ***5409 INVOICE # 13103198 MEASURE L NOTICE-OTHER	\$ 20.25	Court Costs/Filing Fees
07/27/21	Info Track USA - process service Plaintiff's proposed Plan Notice	\$ 41.00	Court Costs/Filing Fees
07/27/21	Info Track USA - process service Notice/other	\$ 20.25	Court Costs/Filing Fees
08/12/21	Info Track US -process service	\$ 20.25	Court Costs/Filing Fees
8/26/2021	MEASURE L ACCOUNT # ***5409 INVOICE # 13145414 PROPOSED ORDER RE PLAN OF NTC	\$ 39.25	Court Costs/Filing Fees
7/29/2024	INFOTRACK US,	\$ 19.20	Court Costs/Filing Fees
7/29/2024	INFOTRACK US, INC	\$ 50.00	Court Costs/Filing Fees
7/29/2024	INFOTRACK US, INC	\$ 39.20	Court Costs/Filing Fees
8/9/2024	Measure L	\$ 50.00	Court Costs/Filing Fees
08/09/24	INFO TRACK US, INC.Measure L	\$ 50.00	Court Costs/Filing Fees
08/09/24	Filings/ Legal Support	\$ 187.55	Court Costs/Filing Fees
08/28/24	INFO TRACK US, INC.Measure L Inv #15893891	\$ 40.20	Court Costs/Filing Fees
9/17/2024	Measure L - Inv #15895482	\$ 50.00	Court Costs/Filing Fees
10/18/24	Info Track Invoice	\$ 69.20	Court Costs/Filing Fees
12/30/2024	Meas L - Inv #16176442	\$ 17.20	Court Costs/Filing Fees
12/30/2024	Meas L - Inv #16169244	\$ 78.20	Court Costs/Filing Fees
12/30/2024	Meas L - Inv #16167761	\$ 20.00	Court Costs/Filing Fees
12/30/2024	Meas L - Inv #16165313	\$ 50.00	Court Costs/Filing Fees
12/30/2024	Meas L - Inv #16165311	\$ 75.00	Court Costs/Filing Fees
1/3/2025	Inv #16192876	\$ 60.00	Court Costs/Filing Fees
1/3/2025	Inv #16192181	\$ 19.20	Court Costs/Filing Fees
2/5/2025	MEASURE L - Court Document	\$ 7.50	Court Costs/Filing Fees
5/9/2025	Measure L - Inv #16520541	\$ 60.00	Court Costs/Filing Fees
5/9/2025	Measure L - Inv #16523970	\$ 40.20	Court Costs/Filing Fees
5/9/2025	Measure L - Inv #16523025	\$ 60.00	Court Costs/Filing Fees
05/15/25	Filing Fees InfoTrac - Inv #6539924	\$ 60.00	Court Costs/Filing Fees
05/27/25	INFO TRACK US, INC.Measure L - Inv #16561832	\$ 25.14	Court Costs/Filing Fees
05/29/25	INFO TRACK US, INC.Measure L - Inv #16571490	\$ 461.14	Court Costs/Filing Fees
6/9/2025	InfoTrack In #16519977;16536907;16601043	\$ 40.38	Court Costs/Filing Fees
06/09/25	InfoTrack In #16519977;16536907;16601043	\$ 69.20	Court Costs/Filing Fees
07/22/21	CAC Services Group - Class Action Consulting	\$ 6,350.42	Expert Fees
10/04/21	Sara Flocks - Disney Communications Project	\$ 1,000.00	Expert Fees
10/19/2021	MEASURE L INVOICE XCIX TRANSLATION SERVICES	\$ 595.00	Expert Fees

07/18/23	Ocean & Mountain - Media Relations Support for Measure L Appeal	\$ 3,000.00	Expert Fees
06/30/24	EconONE Research - Consulting	\$ 24,830.00	Expert Fees
08/28/24	EconONE Research - Audit Consulting Inv #26366	\$ 14,352.50	Expert Fees
10/09/24	EconONE Research - Consulting Inv #26773	\$ 17,167.50	Expert Fees
12/09/24	EconONE Research - Consulting Inv #27118	\$ 23,647.50	Expert Fees
02/07/25	EconONE Research - Consulting Inv #27470	\$ 13,509.00	Expert Fees
04/08/25	EconONE Research - Consulting Inv #27835	\$ 18,649.50	Expert Fees
06/10/25	EconONE Research - Consulting Inv #28214	\$ 10,116.00	Expert Fees
7/14/2025	CAC Services Group - Class Action Consulting	\$ 20,996.01	Expert Fees
4/30/2024	INVOICE #25079; MEDIATION SERVICES - MEASURE L	\$ 27,500.00	Mediation
6/13/2024	MEASURE L; iNVOICE id: 2024-299	\$ 10,000.00	Mediation
2/22/2024	ACCT# 1506-5759-8 INVOICE # 8-410-66009 MEASURE L	\$ 58.07	Postage/Delivery Fees
06/17/21	Veritext LLC- transcripts	\$ 871.80	Transcripts
12/19/19	Mileage/Parking-M. Stroud	\$ 52.78	Travel
08/19/24	Balboa Bay Resort - travel to Houston	\$ 1,336.16	Travel
10/08/24	Airfare RR, SC, CD	\$ 2,562.00	Travel
12/09/24	Mileage/Parking-R.Renick	\$ 21.25	Travel
12/09/24	Mileage/Parking-R.Renick	\$ 7.50	Travel
1/17/2025	Measure L - Logickull	\$ 330.00	Travel
1/17/2025	Uber to Meet Randy	\$ 22.65	Travel
1/17/2025	HILTON HTLS COSTA MESA CA XXXX4001	\$ 26.66	Travel
1/17/2025	HILTON COSTAMESA PARCOSTA MESA CA XXXX4001	\$ 20.00	Travel
01/23/25	Airfare for MS, RR, SC, AL, MR, MS	\$ 4,248.00	Travel
2/7/2025	Valet Parking - \$53.85 plus \$6 tip	\$ 59.85	Travel
2/7/2025	Snacks and Water for Disney Town Hall in Garden Grove	\$ 49.71	Travel
2/7/2025	From Duarte to/from UNITEHERE Local 11 Garden Grove - 72 miles x \$0.70	\$ 50.40	Travel
02/07/25	Mileage from Duarte to/from JSX in Burbank - 55 miles x \$0.70	\$ 38.50	Travel
02/07/25	Valet Parking - \$53.85 plus \$6 tip	\$ 59.85	Travel
02/07/25	From Duarte to/from UNITEHERE Local 11 Garden Grove - 72 miles x \$0.70	\$ 50.40	Travel
02/07/25	Snacks and Water for Disney Town Hall in Garden Grove	\$ 49.71	Travel
2/14/2025	Employee Mileage Reimbursement - 44.3 Miles Each	\$ 62.20	Travel
3/5/2025	MEASURE L - Court Docs; Parking; Meeting costs	\$ 144.13	Travel
5/20/2025	Snacks for 05/20/2025 - Town Hall at UNITE HERE Local 11	\$ 62.46	Travel

DECLARATION OF RANDY RENICK

EXHIBIT 2

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 and was named by Best Lawyers as Lawyer of the Year Southern California for Litigation – Labor and Employment Pasadena for 2017, 2020 and 2025.

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; California 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, 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.

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, 2024, and 2025
- Best Lawyers in America, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023, 2024 and 2025
- Best Lawyer, Lawyer of the Year - Individual Employment Pasadena 2017, 2020 and 2025
- Surfrider 2009 and 2012 Wavemaker of the Year Award
- California Trout 2018 Streamkeeper Award
- Southern California Rising Star, 2004