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Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE**

KATHLEEN GRACE, REGINA DELGADO,
ALICIA GRIJALVA, JAVIER TERRAZAS,
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 KATHLEEN GRACE
IN SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF SODEXO
CLASS ACTION SETTLEMENT**

Judge: Hon. William D. Claster
Hearing Date: September 12, 2025
Time: 9:00 a.m.
Dept.: CX-101

Action Filed: December 6, 2019

DECLARATION OF KATHLEEN GRACE

I, KATHLEEN GRACE, hereby declare as follows:

1. I am over eighteen years of age. I submit this declaration in support of Plaintiffs' Motion for an Order Granting Final Approval of the Class Action Settlement. I make this declaration based on my own personal knowledge, and I could and would testify competently to the following facts if called upon to do so.

2. I was hired as a full-time barista at Starbucks within the Disneyland Park in Anaheim, California ("Disneyland") in August 2016. My employers Sodexo, Inc. and SodexoMagic, LLC, leased via Sodexo, Inc., operate the Starbucks where I worked, which is located within Disneyland. On information and belief, I believe that Disney has contracted with Sodexo for Sodexo to provide Disney with food and beverage services, which are provided at the Disneyland Resort located in Anaheim, California.

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

4. The Starbucks where I worked offers food and beverages to individuals within Disneyland, primarily employees and vendors.

5. I worked as a full-time barista at Starbucks from August 2016 until I was furloughed on or about March 16, 2020, due to the COVID-19 pandemic. I was called back to work on April 8, 2021.

6. My job duties involved preparing drinks, setting up the space, taking customer orders, stocking, doing dishes, and cleaning. We rotated through stations each day, so we performed different tasks each day.

7. As part of my job duties, I was required to comply with the "Disney Look," wearing a full uniform consisting of a black polo shirt, Starbucks apron, Starbucks cap, and safety shoes.

8. My hourly rate on January 1, 2019, was \$12.25/hour. On February 15, 2019, my hourly rate increased to \$13.25/hour. On March 22, 2019, my hourly rate increased to \$14.25/hour. On October 11, 2019, my hourly rate increased to \$14.67/hour, and then to \$15.02/hour on October 16, 2020. Upon being recalled from furlough, my hourly wage was \$15.15/hour, though my hours were reduced to about

25 hours per week.

9. I ended my employment with Sodexo on April 21, 2022.

10. I volunteered to serve as a class representative. I decided to become a class representative to bring claims for Defendants' failure to compensate in accordance with Anaheim's Living Wage Ordinance. I felt it was important for all the workers to get compensated for back wages.

11. In May 2019, I spoke to attorneys from Hadsell Stormer Renick & Dai LLP and McCracken, Stemerman & Holsberry, LLP about my employment at Sodexo, Inc., LLC and answered questions regarding the work I performed as a barista at Starbucks, particularly with respect to hourly pay, work shifts, schedules, and duties. I gave the attorneys detailed information based on my own experience. I also spent time reviewing my records and searching for documents that my attorneys requested or had questions about. Prior to the filing of the Complaint on December 6, 2019, I spent approximately 15 hours talking with the attorneys and gathering information to assist with this case.

12. I spent considerable time responding to written discovery, producing relevant documents, and preparing for and having my deposition taken by Defendant. The deposition took all day. Also, in addition to this declaration, I provided declarations in support of Plaintiffs' motion for class certification and opposition to Sodexo's motion for summary adjudication. I spent time providing information for the declarations, reviewing and signing the declarations. I have spent approximately 30 hours responding to written discovery, preparing for and attending my deposition on May 27, 2021, and providing information for declarations.

13. In June 2023, I communicated with counsel via email and telephone calls to discuss the appeal hearing. I spent approximately 2 hours discussing the status of the appeal.

14. I also worked closely with my attorneys in anticipation of mediation. Plaintiff Class and Sodexo participated in mediation before Mediator Steve Pearl on July 17, 2024. On November 1, 2024, pursuant to a mediator's proposal from Mr. Pearl, the Plaintiff Class and Sodexo reached an agreement in principle to settle this Action in its entirety as to the claims against Sodexo on behalf of the Sodexo Settlement Class. I made sure to be available for the attorneys during the mediation. I spent approximately 1 hour on settlement-related negotiations and preparation.

15. After a settlement was reached, I spent time meeting or on calls with my attorneys to

1 understand the terms of the settlement, and I met and spoke with other class members to inform them of
2 the terms of the settlement. I spent approximately 10 hours meeting or on calls with my attorneys and
3 class members discussing the terms of the settlement.

4 16. As a class representative, I have made myself available to the other class members
5 throughout the litigation of this case. My former co-workers know that I am a named plaintiff in this
6 case, so they often called to ask me what was going on in the case. I answered their questions if I could,
7 or I contacted my attorneys to let them know about the questions. Whenever I received an update about
8 the case from my attorneys, I also contacted the other class members I knew to advise them about the
9 details of the litigation. During the litigation, I spent approximately 20 hours speaking to my former co-
10 workers about the facts and status of the case and contacting the attorneys to get updates about the case.
11 I have spoken with over 25 co-workers.

12 17. From the commencement of the case through the entire settlement process, I have spent
13 approximately 103 hours assisting with this lawsuit.

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

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

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14 *Kathleen Grace*
15 KATHLEEN GRACE