

NOTICE OF CLASS CERTIFICATION (“NOTICE”)

PLEASE READ THIS NOTICE CAREFULLY – IT AFFECTS YOUR RIGHTS

IF YOU ARE A WOMAN EMPLOYED BY A DISNEY-RELATED COMPANY AT ANY TIME ON OR AFTER APRIL 1, 2015, AND YOU FIT THE CLASS DEFINITION BELOW, YOU ARE A MEMBER OF A CERTIFIED CLASS. THIS ONGOING LAWSUIT MAY AFFECT YOUR RIGHTS.

*The Superior Court of The State of California, County of Los Angeles authorized this Notice to be sent.
This is not junk mail or an advertisement. This is not a solicitation from a lawyer.*

- A class action lawsuit is pending in the Superior Court of The State of California, County of Los Angeles (“the Court”) against The Walt Disney Company and various Disney-related companies (referred to in this notice for ease of reference as “Disney”). The lawsuit alleges that Disney violated California’s Equal Pay Act, Labor Code and Unfair Competition Law by paying women employees in California in certain positions less than men for substantially similar work, which Plaintiffs allege also resulted in a failure to pay all wages due to women in this group who separated from employment. Disney expressly denies that women were or are paid less than men performing substantially similar work, denies that any wages are due to former employees, and denies any other allegations of wrongdoing brought in this case.
- On December 8, 2023, the Court decided that this lawsuit should proceed as a class action on behalf of a “Class” (a group of people with similar claims). The **Class Definition** is as follows: Women who have been or will be employed by a Disney-related company in California, between April 1, 2015 and three months before trial, below the level of Vice President, and in a full-time, salaried, non-union position with a Job Level of B1-B4, T1-T4, TL, P1-P6, P2L-P5L, M1-M3, A1-5, E0, E1, or E1X assigned to a job family that is not “other.” This class excludes: (a) individuals working in Hulu, ESPN, Pixar, 21st Century (Fox), FX, National Geographic, Bantech, and ILM; (b) employees in the HR_Compensation job family; (c) in-house employment counsel; (d) any paralegals and legal assistants involved in assisting with respect to this case; and (e) any judge to whom the case is assigned and immediate family members of such judge. There is also a Labor Code Section 203 Subclass, which includes only those Class Members who separated from employment. The Court did not certify claims brought under California’s Fair Employment and Housing Act.
- Neither this Notice nor the Court’s December 8, 2023 class certification order is an endorsement or an expression of any kind by the Court as to the merits of any of the claims or defenses asserted by either side in this litigation. Disney denies the claims and material allegations in the lawsuit. The sole purpose of this Notice is to inform you of the lawsuit and your right to remain in the Class or opt out of it, so that you can make an informed decision.
- If you received a copy of this notice addressed to you, that is because data from Disney’s HR systems indicate that you meet the Class Definition for at least some part of the time since April 1, 2015.

**THIS NOTICE MAY AFFECT YOUR LEGAL RIGHTS WHETHER YOU RESPOND OR NOT,
INCLUDING YOUR RIGHT TO OPT OUT OF THE CLASS IF YOU SO CHOOSE.
PLEASE READ THIS NOTICE CAREFULLY.**

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS

<i>Do Nothing, Remain in the Class</i>	By doing nothing, you are choosing to stay in the Class. You will be bound by any outcome in this case, whether favorable or unfavorable to the Class. You may also be permitted to share in any recovery that might result from this litigation, but you will give up your rights to sue Disney in a separate lawsuit for the claims made in this litigation. The Court has not yet made any decision about the merits of the case. There is thus no money available now to Class Members and no guarantee that there will ever be money available to Class Members. The outcome of this litigation is not yet known.
<i>Exclude Yourself from the Class</i>	If you do not wish to remain in the Class for any reason you may exclude yourself from this lawsuit by opting out of the Class, following the instructions set forth in Section 10 below. If you opt out of the Class, you will: (1) not be bound by any determination or judgment entered in this litigation; (2) not be entitled to any recovery that might result from this litigation; and (3) retain the right to file your own action related to the certified claims in this case if you so choose (with your own lawyer).

BASIC INFORMATION ABOUT THE LAWSUIT

1. Why did I get this Notice?

Disney's records indicate that you were employed by a Disney-related company in California on or after April 1, 2015, and you fit the Class Definition. The Court ordered that you receive this Notice because you have the right to know about your legal options before the Court decides whether the claims being made on behalf of the Class are proven.

2. What is a class action?

In a class action lawsuit, one or more people called "Class Representatives" (in this case LaRonda Rasmussen, Enny Joo and Becky Train) sue on behalf of themselves and other people who the Class Representatives believe to have similar claims, who are referred to as "Class Members." In a class action, the court resolves the issues for all Class Members, except for those who exclude themselves from the Class. Each Class Member is bound by the determination or judgment entered in this case and may not file their own lawsuit over the same claims that were decided in the Class Action.

3. What is the lawsuit about?

This lawsuit alleges that Disney violated California's Equal Pay Act, Labor Code and Unfair Competition Law by paying women employees in California in certain positions less than men for substantially similar work, which Plaintiffs allege also resulted in a failure to pay all wages due to women in this group who separated from employment. Disney expressly denies that women were or are paid less than men performing substantially similar work, denies that any wages are due to former employees, and denies any other allegations of wrongdoing brought in this case.

4. Has the Court decided whether any of the Class Members' claims have merit?

No, the Court has not decided whether any of the Class Members' claims have merit. By establishing the Class and authorizing this Notice, the Court has not decided whether the Class will win or lose this case. The Class Members must prove their claims at a trial, including the value of any damages, if any. Disney maintains the right to challenge the Class Members' claims, both liability and damages, and to assert defenses with respect to Class Members.

5. What are the Class Representatives asking for?

The Class Representatives are asking for money to compensate Class Members for alleged damages and penalties they

claim were caused by Disney, as well as pre-judgment and post-judgment interest and their reasonable attorneys' fees and costs. The Class Representatives also seek injunctive relief. Disney denies any wrongdoing, and as a result, denies that Class Members are entitled to any monetary damages or injunctive relief.

6. Is there any money available now?

No money is available now, and there is no guarantee that money will ever be obtained for Class Members.

YOUR OPTIONS

7. What happens if I choose to stay in the Class?

If you stay in the Class, you will be bound by any outcome or judgment in this case. If you stay in the Class and the Class prevails on its claims at trial and on appeal, or reaches a settlement with Disney, you may be permitted to share in any monetary recovery that the Class obtains. If you stay in the Class and Disney prevails, you will not receive any recovery and you will have given up the right to sue Disney separately about the same legal claims in this lawsuit.

8. How do I stay in the Class?

You do not have to do anything at this time to stay in the Class.

9. What happens if I opt out of the Class?

If you opt out of the Class you will give up the right to participate in any recovery if the Class prevails at trial and on appeal, or reaches a settlement with Disney. This also means you will not be bound by any outcome or judgment entered in this case, and you will keep the right to sue on your own regarding the legal claims certified in this lawsuit.

10. How do I opt out of the Class?

If you do not want to remain a member of the Class, you may opt out of it. To do so, you must do one of the following: (1) complete and send the enclosed Class Action Opt-Out Request Form to the Notice Administrator via mail or email; (2) submit a signed and dated letter to the Notice Administrator via mail or email with your name, address and phone number, which states: "I have received notice of the class action, *Rasmussen, et al. v. The Walt Disney Company, et al.* I wish to be excluded from the Class and not participate in any resolution or settlement of the litigation, nor be bound by any outcome or judgment in the case."; or (3) submit a Class Action Opt-Out Request Form electronically via the website or hyperlink below.

If you submit the Class Action Opt-Out Request Form by mail, it must be postmarked no later than June 24, 2024. If you submit the Form via the website, hyperlink, or email, it must be received by the Notice Administrator by June 24, 2024, as well.

The Notice Administrator's website, address and contact information is:

Rasmussen, et al. v. The Walt Disney Company, et al.
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606
Website: www.RasmussenvTWDC.com
Hyperlink to Opt Out Form: www.RasmussenvTWDC.com/LogIn
Email: RasmussenvTWDC@cptgroup.com
Toll Free: 1-888-801-2208

You cannot exclude yourself unless you follow one of the steps above.

11. If I stay in the Class, do I have to participate in the trial?

You will likely not need to attend the Class trial unless you are called as a witness. You are welcome to attend, at your expense, regardless of whether or not you are a trial witness and regardless of whether or not you opt out of the Class.

THE LAWYERS REPRESENTING THE CLASS MEMBERS

12. Do I have a lawyer representing my interests in this Class Action?

The Court has appointed lawyers to represent the Class Members. The Court has decided that they are qualified to represent the Class Members. These lawyers are called “Class Counsel.” Their contact information is:

Lori Andrus ANDRUS ANDERSON LLP 155 Montgomery St., Ste. 900 San Francisco, CA 94104 www.andrusanderson.com lori@andrusanderson.com Tel.: (415) 986-1400	Joseph M. Sellers, Christine E. Webber, & Phoebe Wolfe COHEN MILSTEIN SELLERS & TOLL PLLC 1100 New York Ave. NW, 5th Fl. Washington, DC 20005 www.cohenmilstein.com cwebber@cohenmilstein.com Tel.: (202) 408-4600	James Kan, Byron Goldstein, & Stephanie Tilden GOLDSTEIN, BORGEN, DARDARIAN & HO 155 Grand Avenue, Suite 900 Oakland, CA 94612 www.gbdhlegal.com brgoldstein@gbdhlegal.com Tel.: (510) 763-9800
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13. How will the lawyers be compensated?

If recovery is obtained for the Class, Class Counsel will request from the Court an award for attorneys’ fees and expenses. If approved, these fees and expenses will either be paid from the recovery obtained for the Class or separately by Disney. If no recovery is obtained, the lawyers will receive nothing. You will not have to pay separately for any of Class Counsel’s fees, costs or expenses.

14. Should I get my own lawyer?

You do not need to hire your own lawyer to participate in this lawsuit, though you may do so if you choose, at your own expense. The Court has appointed Class Counsel to represent the Class, including you, if you choose to remain in the Class.

GETTING MORE INFORMATION

15. Where do I get more information?

Visit the website, www.RasmussenVTWDC.com, where you will find the Court’s Order Certifying the Class and the Fourth Amended Complaint that the Plaintiffs submitted. Complete copies of public pleadings, court rulings and other filings are available for review and copying at the Clerk’s office. The address is 312 N. Spring Street, Los Angeles, CA 90012. You may also contact Class Counsel with Questions (see information in Question 12, above).

PLEASE DO NOT CONTACT THE COURT OR THE CLERK OF THE COURT REGARDING THIS ACTION.
THE COURT AND THE CLERK OF THE COURT WILL NOT DISCUSS THE ACTION WITH YOU.