

*Superior Court of California, Los Angeles County
Rasmussen v. The Walt Disney Company, et al.
Case No. 19STCV10974*

**Notice of Class Action Settlement ("Notice")
Authorized by the California Superior Court**

Are you a woman who worked for a Disney-related company in California at any time between April 1, 2015 and December 28, 2024?

There is a proposed settlement of the lawsuit named above, for \$43.25 million. You may be entitled to payment from the settlement.

To be part of this settlement and receive money, you do not need to take any action.

If you do not want to be part of the settlement, you must opt out by August 16, 2025.

Important things to know:

- The parties have agreed to settle the case listed above. You are receiving this notice because relevant records show that you are a settlement class member.
- If you take no action, you will remain in the class; you will receive money automatically and be bound by the settlement.
- You can learn more at: www.RasmussenVTWDCSettlement.com.

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About This Notice

Why did I receive this notice?

This notice is to inform you about the settlement of a class action lawsuit, *Rasmussen v. The Walt Disney Company, et al.*, brought on behalf of women who worked for certain Disney-related companies (the "Defendants") in California between April 1, 2015 and December 28, 2024. **You received this notice because Defendants' records indicate you are a member of the group of people affected by the settlement, called the settlement class.** This notice gives you a summary of the terms of the settlement and explains your rights as a class member.

This is an important legal document, and we recommend that you read all of it. If you have questions or need assistance, please go to www.RasmussenVTWDCSettlement.com or call 1 (888) 801-2208.

What do I do next?

Read this notice to understand the settlement. Then, decide if you want to:

Your Options	More information about each option
DO NOTHING AND RECEIVE A PAYMENT	If you do nothing, you will receive a cash payment, and you will be bound by the settlement.
OPT OUT	If you opt out, you will not receive a cash payment, and you will not be bound by the settlement.
OBJECT	If you do not agree with the settlement, you can tell the Court through an objection.

Read on to understand the specifics of the settlement and what each choice would mean for you.

What are the most important dates?

Your deadline to mail an opt out form or objection: **August 16, 2025**

Final hearing: **September 15, 2025 at 9:00 a.m. Pacific Standard Time**

About the Lawsuit

What is this lawsuit about?

This lawsuit was filed in 2019, alleging that Defendants violated the law by paying women employees in certain positions in California less than men for similar work.

Defendants expressly deny that women are or were paid less than men performing similar work and deny all of the other allegations brought in the case.

You can get a complete copy of the proposed settlement and other key documents in this lawsuit by visiting:

www.RasmussenVTWDCSettlement.com

Why is there a settlement?

The parties have agreed to settle the case because both see risks and uncertainties for each side in continued litigation. The Plaintiffs and their counsel believe that the settlement is fair, reasonable, and in the best interests of the Class Members. The Court has approved this notice of settlement, but the settlement will not become final unless the Court approves it. The settlement is not an admission by Defendants that Plaintiffs' claims have merit or that Defendants have any liability to Plaintiffs or Class Members.

What are the next steps?

The Court will hold a hearing to decide whether to approve the settlement. The hearing will be held at:

Where: Spring Street Courthouse, 312 North Spring Street, Los

Angeles, CA 90012

When: September 15, 2025 at 9:00 a.m. Pacific Standard Time.

You do not need to attend the hearing, but you may at your own expense. You may also ask the Court for permission to speak and express your opinion about the settlement. The date of the hearing may change without further notice to members of the class. To confirm the hearing date, go to www.RasmussenVTWDCSettlement.com.

Updating your contact information

If your contact information is inaccurate, or if you move before you receive your Settlement Payment, you should contact the Settlement Administrator to provide your updated mailing address. The Settlement Administrator can be contacted by phone at 1-(888) 801-2208 or email at RasmussenVTWDC@cptgroup.com. It is your responsibility to keep a current address on file with the Settlement Administrator.

Learning About the Settlement

What does the settlement provide?

Defendants have agreed to pay \$43,250,000 into a settlement fund. This money will be divided among the class members and will also be used to pay for costs and fees approved by the Court, including the cost of administering this settlement (expected to be approximately \$100,000), attorneys' fees (no more than \$14,416,666.67) and costs (no more than \$1,800,000), service awards for the nine Class Representatives who brought this case (\$90,000 total), and \$250,000 for resolution of claims under the Private Attorneys General Act ("PAGA"). Members of the settlement class will release their claims as part of the settlement, which means they cannot sue Defendants for the same issues in this lawsuit. The full terms of the release can be found below.

None of the Class Settlement Fund will revert to Defendants.

The law requires that recoveries under PAGA must be split, with 75%

going to the California Labor and Workforce Development Agency, and 25% allocated to the PAGA Group. Everyone falling within the class definition who worked for Defendants on or after July 15, 2018, is within the PAGA Group, and thus will share in \$62,500.

In addition, Defendants will be working with a labor economist to conduct privileged pay equity analyses over the next three years, and working with an industrial organizational psychologist to provide training to Defendants' Compensation personnel involved in organizing jobs within Defendants' job architecture on best practices for benchmarking jobs to external market data and organizing jobs within Defendants' job architecture.

The nine Named Plaintiffs who brought this lawsuit have also negotiated separate agreements to settle their individual, non-class claims for promotions they were each allegedly denied. Defendants deny these allegations. After excluding attorneys' fees, individual settlements for the nine Named Plaintiffs range from four-figures to six-figures. The total of these separate agreements is approximately \$1.16 million for the nine Named Plaintiffs' non-class claims, and \$583,333 for attorneys' fees. Promotion claims are not included in the class settlement because Plaintiffs determined they did not have a basis to pursue them on a class basis.

More information about the settlement can be found in the Settlement Agreement at www.RasmussenVTWDCSettlement.com.

Am I a settlement class member?

If you are a woman who worked in a "covered position" for Defendants in California at any time between April 1, 2015 and December 28, 2024, you are part of this settlement.

A "covered position" is any salaried, full-time, non-union position below the level of Vice President, with a job level of B1-B4, T1-T4, TL, P1-P6, P2L-P5L, M1-M3, A1-5, E0, E1, or E1X. This settlement does not include: (a) individuals working in Hulu, ESPN, Pixar, 21st Century (Fox), FX, National Geographic, Bamtech, or ILM; (b) employees in the HR Compensation job family; (c) in-house employment counsel; or (d) any paralegals and legal assistants involved in assisting with respect to this case.

If you received a copy of this notice addressed to you either by mail or email, Defendants' records indicate you are part of this settlement. If you are unsure of whether you are part of this settlement, contact the Settlement Administrator at 1 (888) 801-2208.

How was my estimated payment calculated?

All class members will receive a settlement payment unless they opt out. Settlement payments will be calculated according to the Allocation Plan, Ex. B to the Settlement Agreement. This Allocation Plan is summarized in the enclosed Estimated Settlement Payment insert.

- The Class Settlement Fund size will depend in part on the amount of fees, costs, and service awards approved by the Court.
- Every Class Member will be awarded a minimum of \$200. The amounts in addition to the minimum will be calculated as described in the enclosed Estimated Settlement Payment insert.
- Everyone falling within the PAGA Group will receive an equal share of the PAGA award that goes to plaintiffs rather than to the state.

What claims am I releasing if I do not opt out?

If you do not opt out, you will release all claims asserted or that could have been asserted on behalf of the classes against Defendants and Released Parties under the provisions of the Amended Complaint, including without limitation claims under the California Equal Pay Act (Cal. Lab. Code § 1197.5), gender-based FEHA pay discrimination claims (Cal. Gov't Code § 12900, et seq.), waiting time claims (Cal. Lab. Code §§ 201-203), California Labor Code section 232 claims, California Labor Code section 210 claims, and Unfair Competition Law claims (Cal. Bus. & Prof. Code § 17200, et seq.), based on the facts alleged in the Amended Complaint that occurred during the period April 1, 2015 through May 9, 2025. Such claims include claims for wages, liquidated damages, statutory penalties, civil penalties, attorneys' fees and costs, and interest.

The State of California and all PAGA Group members will release any and all PAGA claims for civil penalties against Defendants and the Released Parties that were pled or could have been pled based on the factual allegations contained in the notices dated July 5, 2019,

September 18, 2019, and November 21, 2024, submitted by Plaintiffs to the Labor and Workforce Development Agency (“LWDA”) pursuant to PAGA, that occurred during the period July 15, 2018 through May 9, 2025, including but not limited to claims under California Labor Code sections 201-204, 210, 226, 232, 1194.5, 1197.5, and 2698 et seq.

The Released Parties are Defendants, and each of their respective affiliates, parents, subsidiaries, successors and all other related entities, including but not limited to all of their incumbent and former officers, directors, owners, members, managers, shareholders, investors, agents, insurers, attorneys, employees, fiduciaries, successors, assigns, and representatives, in their individual and/or representative capacities.

The Amended Complaint and the complete Settlement Agreement can be found at www.RasmussenVTWDCSettlement.com.

Deciding What You Want to Do

How do I weigh my options?

You have three options: (1) You can do nothing and stay in the settlement to receive payment, (2) you can opt out of the settlement, or (3) you can object to the settlement. This chart shows the effects of each option:

	<i>do nothing</i>	<i>opt out</i>	<i>object</i>
Will I receive settlement money if I . . .	YES	NO	YES
Am I bound by the terms of this settlement if I . . .	YES	NO	YES
Can I pursue my own case if I . . .	NO	YES	NO
Will the class lawyers represent me in this case if I . . .	YES	NO	NO

How do I receive a payment if I am a class member?

If you wish to receive money, **you do not need to do anything**. By doing nothing, you will remain a part of this settlement and your payment will automatically be mailed to you. To ensure that you receive your check in the mail, you should ensure that the administrator has your correct mailing address.

If you don't want to be bound by the settlement, you must opt out.

Do I have a lawyer in this lawsuit?

In a class action, the court appoints class representatives and lawyers—called Class Counsel—to work on the case and defend the interests of all the class members. If you want to be represented by your own attorney, you may hire one at your own expense. For this settlement, the Court has appointed the following individuals and lawyers.

Class Representatives: LaRonda Rasmussen, Karen Moore, Virginia Eady-Marshall, Enny Joo, Rebecca Train, Nancy Dolan, Anabel Pareja Sinn, Dawn Johnson, and Chelsea Hanke.

Class Counsel: Andrus Anderson LLP, Cohen Milstein Sellers & Toll PLLC, and Dardarian Ho Kan & Lee. These are the law firms that negotiated this settlement on your behalf. You will not be charged for their services.

Do I have to pay the lawyers in this lawsuit?

Attorneys' fees and costs will be paid from the settlement fund used to pay class members' claims. You will not have to pay the Class Counsel directly.

To date, Class Counsel have not been paid any money for their work or out-of-pocket expenses in this case. To pay for their time and risk in bringing this case without any guarantee of payment unless they were successful, Class Counsel will request, as part of the final approval of the settlement, that the Court authorize a payment of up to \$14,416,666.67 total in attorneys' fees (1/3 of the total settlement amount) plus the reimbursement of out-of-pocket expenses totaling

no more than \$1,800,000. Attorneys' fees and expenses will only be awarded if authorized by the Court as a fair and reasonable amount.

Opting Out

What if I don't want to be part of this settlement?

You can opt out. If you do, you will not receive payment of your settlement share and cannot object to the settlement. However, you will not be bound by the settlement and may be able to file your own case. Regardless of whether you opt out, if you are a member of the PAGA Group, you will still receive a share of the PAGA settlement, which is expected to be a total of \$62,500 that will be divided among the entire PAGA Group equally.

How do I opt out?

To opt out of the settlement, you must submit a written statement by August 16, 2025 to the settlement administrator at:

Rasmussen v. The Walt Disney Co.
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606
Toll Free Number: 1-(888) 801-2208
Email: RasmussenvTWDC@cptgroup.com

You may also submit an opt-out statement here:
www.RasmussenVTWDCSettlement.com.

To be valid, your opt out must include your name, address, telephone number, your unique Notice Identification Number, your signature, and state in writing that you want to exclude yourself and will not receive a settlement payment.

Objecting

What if I disagree with the settlement?

If you disagree with any part of the settlement (including the attorneys'

fees) but do not want to opt out, you may object. You must give reasons why you object, and say whether your objection applies to just you as a class member, or the entire class. Your views will be presented to the Court. The Court can only approve or deny the settlement as is—it cannot change the terms of the settlement. You may, but don't need to, hire your own lawyer to help you.

To object, you can submit a letter to the settlement administrator or appear at the final hearing. If you wish to submit a written objection, it must:

- (1) be postmarked or submitted to the website by August 16, 2025;
- (2) include your full name, address and telephone number;
- (3) include your unique Notice Identification Number contained in this Notice
- (4) state the reasons for your objection; and
- (5) contain your signature.

Submit the letter on the website or mail it to:

Rasmussen v. The Walt Disney Co.
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606
Toll Free Number: 1-(888) 801-2208
Email: RasmussenvTWDC@cptgroup.com

Key Resources

How do I find more information?

This notice is a summary of the proposed settlement. The complete settlement with all its terms can be found on the case website listed below, along with other documents about the case. To obtain a hard copy of the settlement agreement or receive answers to your questions:

- contact Class Counsel (information below)
- visit the case website at www.RasmussenVTWDCSettlement.com

Resource	Contact Information
Case website	www.RasmussenVTWDCSettlement.com
Settlement Administrator	Rasmussen v. The Walt Disney Co. c/o CPT Group, Inc. 50 Corporate Park Irvine, CA 92606 Toll Free Number: 1-(888) 801-2208 Email: RasmussenvTWDC@cptgroup.com
Class Counsel	Andrus Anderson LLP 155 Montgomery Street, Suite 900 San Francisco, CA 94104 contact@andrusanderson.com (415) 986-1400
	Cohen Milstein Sellers & Toll PLLC 1100 New York Avenue NW, Eighth Floor Washington, DC 20005 DisneySettlement@cohenmilstein.com (202) 408-3655
	Dardarian Ho Kan & Lee 155 Grand Avenue, Suite 900 Oakland, CA 94612 DisneySettlement@dhkl.law 800-822-5000
Court (DO NOT CONTACT)	In addition to the Settlement Agreement and other materials on the settlement website listed above, the pleadings and complete records in this litigation may be examined (a) online on the Superior Court of California, County of Los Angeles at www.lacourt.org , or (b) in person at Records, Superior Court of California, County of Los Angeles, 312 N. Spring Street, Los Angeles, CA 90012, between the hours of 8:30 a.m. and 4:30 p.m., Monday through Friday, excluding Court holidays and closures.