

1 THE LAW OFFICE OF OMID NOSRATI
2 Omid Nosrati, Esq. (SBN 216350)
3 1801 Century Park East, Ste. 840
4 Los Angeles, California 90067
5 Telephone: (310) 553-5630
6 Facsimile: (310) 553-5691
7 Email: omid@nosratilaw.com

8 MICHAEL ZAROCOSTAS, Esq.
9 (SBN 277440)
10 1425 N. Occidental Blvd.
11 Los Angeles, CA 90026
12 Telephone: (917) 331-2496
13 Email: Michael@GothamAttorney.com

14 Attorneys for Plaintiff,
15 JOEL HOPKINS

16 SUPERIOR COURT OF THE STATE OF CALIFORNIA
17 FOR THE COUNTY OF LOS ANGELES, CENTRAL DISTRICT
18 UNLIMITED JURISDICTION

19 JOEL HOPKINS, an Individual,

20 Plaintiff,

21 vs.

22 THE WALT DISNEY COMPANY, a Delaware
23 Corporation; ABC SIGNATURE STUDIOS,
24 INC., a Delaware Corporation; RIVERSIDE
25 TELEVISION SERVICES, LLC., a Delaware
26 Limited Liability Company, and Does 1-25,
27 inclusive,

28 Defendants.

Case No.

COMPLAINT FOR MONETARY AND
PUNITIVE DAMAGES

1. DISCRIMINATION BASED ON SEXUAL ORIENTATION [CAL. GOV'T CODE §12940(a)]
2. FAILURE TO PREVENT DISCRIMINATION IN VIOLATION OF THE FAIR EMPLOYMENT AND HOUSING ACT [CAL. GOV'T CODE §12940(k)]

DEMAND FOR JURY TRIAL

I.

PARTIES

1. At all times relevant for purposes of this Complaint, Plaintiff, JOEL HOPKINS ("Plaintiff") has been a resident of the State of California.

1 2. Plaintiff is informed and believes, and on that basis alleges, that at all times relevant
2 for purposes of this Complaint, Defendant THE WALT DISNEY COMPANY was and is a
3 Delaware corporation, doing business in the State of California. Defendant is an “employer” as
4 defined by California Government Code Sections 12926(d), 12940(a), 12940(h) and 12940(j)(4)(A).

5 3. Plaintiff is informed and believes, and on that basis alleges, that at all times relevant
6 for purposes of this Complaint, Defendant ABC SIGNATURE STUDIOS, INC. was and is a
7 Delaware corporation, doing business in the State of California. Defendant is an “employer” as
8 defined by California Government Code Sections 12926(d), 12940(a), 12940(h) and 12940(j)(4)(A).

9 4. Plaintiff is informed and believes, and on that basis alleges, that at all times relevant
10 for purposes of this Complaint, Defendant RIVERSIDE TELEVISION SERVICES, LLC.
11 was and is a Delaware limited liability company, doing business in the State of California.
12 Defendant is an “employer” as defined by California Government Code Sections 12926(d),
13 12940(a), 12940(h) and 12940(j)(4)(A).

14 5. Plaintiff is ignorant of the true names and capacities, whether individual, corporate,
15 associate, or otherwise, of Defendants named herein as DOES 1 through 25, inclusive, and therefore
16 sues Defendants by such fictitious names. Defendants DOES 1 through 25, at all times relevant for
17 purposes of this Complaint were employees, agents, officers and/or members of the board of
18 directors of Defendants. Plaintiff will amend this complaint to allege the true names and capacities
19 of the Defendants designated herein as DOES 1 through 25, inclusive, when they have been
20 ascertained.

21 6. Plaintiff is informed and believes, and on that basis alleges, that all named
22 Defendants are Plaintiff’s joint employer, and in addition to the named defendants, those designated
23 herein as DOES 1 through 25, inclusive, are also responsible in some manner for the acts, events and
24 occurrences alleged herein, and caused or contributed to the damages sustained by Plaintiff.

25 7. Plaintiff is informed and believes, and on that basis alleges, that at all times relevant
26 for purposes of this Complaint, the Defendants designated herein as DOES 1 through 25, inclusive,
27 acted as the agents, employees, directors, officers, co-venturers, and partners of the named
28 Defendants and such fictitiously-named Defendants. Each of them, while acting in the course and

1 scope of their agency, employment, corporate capacities, and partnership, performed the acts and
2 conduct hereinafter alleged, and said acts and conduct were ratified and approved by each
3 Defendant.

4 **II.**

5 **JURISDICTION**

6 8. The named Defendants (collectively, "DISNEY") are subject to suit under the
7 California Fair Employment and Housing Act ("FEHA") as they regularly employ five or more
8 persons in the State of California. [Gov't Code § 12926(d).] FEHA prohibits discrimination and
9 retaliation on the basis of sexual orientation, sex, color, national origin, ancestry and age, among
10 other acts, by an employer against an employee.

11 9. Plaintiff has exhausted all administrative remedies necessary and has timely brought
12 this action. (Plaintiff's DFEH Complaints and Right to Sue Notices are attached as Exhibit 1).

13 10. This court has jurisdiction to hear both statutory and common law claims against
14 Defendant and DOES 1 through 25.

15 **III.**

16 **FACTS COMMON TO ALL CAUSES OF ACTION**

17 11. Plaintiff began his employment in or around 1994. His title was Director of
18 Production Finance for Buena Vista Television.

19 12. Within the first six years of his employment, Plaintiff received two promotions. In or
20 around 1997, Plaintiff was promoted to Executive Director. In or around the middle of 2000,
21 Plaintiff was hired by Jim Hedges (Senior Vice President of Finance for ABC Entertainment Group)
22 and promoted to Vice President of Production Finance for Touchstone Television.

23 13. Shortly after Plaintiff's promotion to Vice President of Production Finance for
24 Touchstone Television, Jim Hedges was promoted to CFO of ABC.

25 14. Also, shortly after Plaintiff's promotion to Vice President of Production Finance for
26 Touchstone Television, Plaintiff's sexual orientation as a gay man became known to several
27 individuals, including Plaintiff's direct supervisor, Jim Hedges, the CFO of ABC. Then, after
28 negative and adverse reactions to this information, for approximately the past 20 years of his

1 employment, Plaintiff has experienced an ongoing pattern of discrimination, including, but not
2 limited to, being passed over for promotions and not being paid at a level commensurate with other
3 department heads.

4 15. Plaintiff was passed over repeatedly for promotions, including instances where
5 Plaintiff was not even considered for positions and Defendants hired persons with less experience
6 than Plaintiff and/or with little to no experience working for Defendants.

7 16. Plaintiff was over-scrutinized and harassed in his work, including without limitation
8 being falsely blamed for issues that were not even in the scope of his responsibility, thereby creating
9 a hostile environment.

10 17. Plaintiff also suffered disparate and/or discriminatory treatment, including being
11 denied requests for additional head count and support, being excluded from executive meetings, and
12 repeatedly having his office space downsized.

13 18. Upon information and belief, Plaintiff believes that others reported and made
14 complaints about the discrimination of Plaintiff to Defendants' high-level executives and HR, but
15 nothing was ever done to remedy the discrimination. In fact, Plaintiff was never even contacted by
16 HR.

17 19. Plaintiff was also humiliated and suffered a reduction in authority, including by (a)
18 being forced into an unorthodox hierarchy and reporting structure where Plaintiff – a VP – was
19 required to report to other VPs including a straight male (i.e., the same level, and sometimes to
20 persons with less experience and/or no production or production finance experience and/or shorter
21 tenure than Plaintiff), (b) being denied the ability to manage the performance of subordinates, (c)
22 being denied merit and bonus planning, and (d) having subordinates taken away from him to report
23 to others, all of which thereby devalued Plaintiff's role and impaired his authority and reputation.

24 20. Plaintiff is also informed and believes that his compensation is less than other
25 individuals who are also department heads and that his title is lower than other individuals who are
26 also department heads, especially for someone of Plaintiff's experience and tenure.

27 21. Plaintiff has made direct and repeated complaints to HR about the discrimination he
28 has endured while employed by Defendants and, concomitantly, the related failures to promote him

1 and to pay him at the same level as other department heads. Plaintiff has asked for the
2 discrimination and situation to be rectified, but HR and Defendants have provided no relief
3 whatsoever.

4 22. After his sexual orientation became known to his superiors and after being
5 discriminated against, and after being put on a dead-end career track and repeatedly denied
6 promotions with no remedy or relief from HR, Plaintiff is informed and believes that yet again, in or
7 around April 2021, several promotions occurred, but Plaintiff once again was not promoted.

8 23. Plaintiff is informed and believes that these promotions occurred despite
9 representations that DISNEY was hurting financially and was not promoting.

10 **IV.**

11 **FIRST CAUSE OF ACTION FOR DISCRIMINATION BASED ON SEXUAL**
12 **ORIENTATION IN VIOLATION OF THE FEHA [Cal. Gov't Code §12940(a)]**

13 (Against All Defendants and DOES 1 through 25, inclusive)

14 24. Plaintiff incorporates by reference the preceding paragraphs of this Complaint, as
15 though fully stated herein.

16 25. At all times relevant for purposes of this Complaint, the California Fair Employment
17 and Housing Act ("FEHA"), Gov't Code § 12940(a) was in full force and effect and binding on
18 Defendants. FEHA makes it unlawful for an employer, on the basis of sexual orientation, "to
19 discriminate against the person in compensation or in terms, conditions, or privileges of
20 employment."

21 26. At all times herein mentioned, Plaintiff was a member of a protected class, in that he
22 is gay.

23 27. During his employment, Plaintiff has performed his worked competently and in a
24 satisfactory manner.

25 28. After learning of Plaintiff's sexual orientation, Defendant engaged in an ongoing
26 pattern of discrimination, including but not limited to the following:

- 27
- Failing to promote Plaintiff;
 - Providing lower compensation to Plaintiff in comparison to other department
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heads employed by Defendants;

- Long term devaluation of Plaintiff, which greatly hindered his ability to be promoted or prosper within the company;
- Having his office space downsized twice, resulting in Plaintiff's office space being much smaller than other employees at his level, including other department heads;
- Being regularly excluded from Executive meetings, thus having to pick up information second hand to perform his job responsibilities; and
- Being the only employee at the studio with a VP title that has been at the same title for 20 years without a promotion despite the studio quintupling in production volume from the time he was promoted into the VP role.

29. Accordingly, Defendants have discriminated against Plaintiff and continue to discrimination against him based on his sexual orientation in violation of the FEHA.

30. As a proximate result of Defendants' conduct, Plaintiff has suffered actual, consequential and incidental financial losses, including without limitation, loss of salary and benefits, and the intangible loss of employment-related opportunities for growth in his field and damage to his professional reputation, all in an amount subject to proof at the time of trial. Plaintiff claims such amounts as damages together with prejudgment interest pursuant to Civil Code Sections 3287 and/or 3288 and/or any other provision of law providing for prejudgment interest.

31. As a proximate result of the wrongful acts of Defendants, and each of them, Plaintiff has suffered and continues to suffer emotional distress and has incurred and will likely incur, medical expenses as a result. Plaintiff is informed and believes and thereon alleges that he will continue to experience said mental and emotional suffering for a period in the future he cannot presently ascertain, all in an amount subject to proof at the time of trial.

32. As a proximate result of the wrongful acts of Defendants, and each of them, Plaintiff has been forced to hire attorneys to prosecute his claims herein, and has incurred and is expected to continue to incur attorneys' fees and costs in connection therewith. Plaintiff is entitled to recover such attorneys' fees and costs under California Government Code Section 12965(b).

1 33. The acts taken toward Plaintiff were carried out by and/or ratified by Defendant
2 and/or managing agent employees of Defendant acting in a despicable, oppressive, fraudulent,
3 malicious, deliberate, egregious, and inexcusable manner in order to injure and damage Plaintiff,
4 thereby justifying an award to him of punitive damages in a sum appropriate to punish and make an
5 example of Defendants, and each of them.

6 V.

7 **SECOND CAUSE OF ACTION FOR FAILURE TO PREVENT DISCRIMINATION IN**
8 **VIOLATION OF THE FEHA [Cal. Gov't Code §12940(k)]**

9 (Against All Defendants and DOES 1 through 25, inclusive)

10 34. Plaintiff incorporates by reference the preceding paragraphs of this Complaint, as
11 though fully stated herein.

12 35. At all times relevant for purposes of this Complaint, the FEHA, Gov't Code § 12900
13 et seq., was in full force and effect and binding on Defendants. FEHA requires Defendants, among
14 other things, "to take all reasonable steps necessary to prevent discrimination and harassment from
15 occurring."

16 36. In perpetrating the above-described acts and failures to act, Defendants and their
17 agents violated these provisions by failing to take all reasonable steps necessary to prevent such
18 discrimination based on sexual orientation from occurring. In violation of Gov't Code §12940(k),
19 these acts and failures to act include, but are not limited to, the following:

- 20 (a) Having no policies, practices and procedures and/or failing to implement
21 policies, practices and procedures and/or having ineffective policies, practices,
22 and procedures regarding Defendants' obligations to refrain from
23 discrimination;
- 24 (b) Having no policies, practices and procedures and/or failing to implement
25 policies, practices and procedures and/or having ineffective policies, practices,
26 and procedures regarding the handling of complaints of discrimination;
- 27 (c) Failing to investigate when discrimination was reported, despite there being
28 such reports;

- 1 (d) Failing to provide any and/or adequate training, education, or information to
2 their personnel, and most particularly to management and supervisory
3 personnel with regard to policies and procedures regarding preventing
4 discrimination;
- 5 (e) Failing to appoint a qualified, neutral third party to investigate an employee's
6 allegations;
- 7 (h) Failing to take permanent remedial steps reasonably calculated to end the
8 discrimination and deter future discrimination.

9 37. During the entire relevant period, Defendants failed to take all reasonable steps to
10 prevent discrimination, and such discrimination was condoned, encouraged, tolerated, sanctioned,
11 and ratified.

12 38. During the entire relevant period, Defendants failed to provide any and/or adequate
13 training, education, and/or information to their personnel, and most particularly to management and
14 supervisory personnel with regard to policies and procedures regarding discrimination on the basis
15 of sexual orientation.

16 39. During the entire relevant period, Defendants failed to take reasonable steps to
17 prevent discrimination from being inflicted against Plaintiff.

18 40. As a direct and proximate result of Defendants' unlawful actions, Plaintiff has
19 suffered and continues to suffer mental injuries, extreme and severe mental anguish, and emotional
20 distress. Plaintiff has incurred and will continue to incur medical expenses for treatment by
21 physicians, psychiatrists and other healthcare providers, and for other incidental medical expenses.
22 Plaintiff has suffered and will continue to suffer loss of earnings, and other employment benefits and
23 job opportunities. Plaintiff is therefore entitled to general and compensatory damages in an amount
24 to be proven at trial.

25 41. The conduct of Defendants, and each of them, and their agents and employees as
26 described herein, was malicious, fraudulent, and oppressive, and done with a willful and conscious
27 disregard for Plaintiff's rights and for the deleterious consequences of Defendants' actions.

28 42. Defendants and each of them, and their agents, employees, directors, managers, or

1 supervisors, authorized, condoned, and ratified the unlawful conduct of each other. Plaintiff is
2 thereby entitled to punitive and exemplary damages against Defendants and each of them.

3 43. Plaintiff has incurred and continues to incur attorneys' fees and legal expenses in an
4 amount to be proven at trial.

5 44. As a proximate result of the wrongful acts of Defendants, and each of them, Plaintiff
6 has been forced to hire attorneys to prosecute his claims herein, and has incurred and is expected to
7 continue to incur attorneys' fees and costs in connection therewith. Plaintiff is entitled to recover
8 such attorneys' fees and costs under California Government Code Section 12965(b).

9 45. The acts taken toward Plaintiff were carried out by and/or ratified by Defendant
10 and/or managing agent employees of Defendant acting in a despicable, oppressive, fraudulent,
11 malicious, deliberate, egregious, and inexcusable manner in order to injure and damage Plaintiff,
12 thereby justifying an award to him of punitive damages in a sum appropriate to punish and make an
13 example of Defendants, and each of them.

14 **PRAYER FOR RELIEF**

15 WHEREFORE, PLAINTIFF prays for judgment as follows:

- 16 1) For compensatory damages including damages for lost wages, lost employee benefits,
17 bonuses, vacation benefits, medical expenses, pain, suffering and emotional distress,
18 and other special and general damages according to proof at trial;
- 19 2) For prejudgment interest at the maximum legal rate;
- 20 3) For post-judgment interest at the maximum legal rate;
- 21 4) For punitive damages in an amount appropriate to punish Defendants and to deter
22 others from engaging in similar conduct for all causes of action in which such
23 damages are recoverable, pursuant to FEHA, Civil Code § 3294 and all other
24 applicable statutes;
- 25 5) For the payment of PLAINTIFF's reasonable attorneys' fees and expert witness fees
26 pursuant to Gov't Code § 12965(b), and all other applicable statutes;
- 27 6) For costs of suit herein incurred;
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- 7) For declaratory and injunctive relief; and
- 8) For such other and further relief as the Court may deem just and proper.

Dated: June 1, 2021

THE LAW OFFICE OF OMID NOSRATI

By: /s/ Omid Nosrati
OMID NOSRATI, ESQ.
MICHAEL ZAROCOSTAS, Esq.
Attorneys for Plaintiff,
JOEL HOPKINS

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a trial by jury.

Dated: June 1, 2021

THE LAW OFFICE OF OMID NOSRATI

By: /s/ Omid Nosrati
OMID NOSRATI, ESQ.
MICHAEL ZAROCOSTAS, Esq.
Attorneys for Plaintiff,
JOEL HOPKINS

UNFILED
Deadline

EXHIBIT 1



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

KEVIN KISH, DIRECTOR

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
(800) 884-1684 (Voice) | (800) 700-2320 (TTY) | California's Relay Service at 711
<http://www.dfeh.ca.gov> | Email: contact.center@dfeh.ca.gov

April 30, 2021

Omid Nosrati, Esq.
1801 Century Park East, Ste. 840
Los Angeles, California 90067

RE: **Notice to Complainant's Attorney**
DFEH Matter Number: 202104-13423230
Right to Sue: Hopkins / RIVERSIDE TELEVISION SERVICES, LLC et al.

Dear Omid Nosrati, Esq.:

Attached is a copy of your complaint of discrimination filed with the Department of Fair Employment and Housing (DFEH) pursuant to the California Fair Employment and Housing Act, Government Code section 12900 et seq. Also attached is a copy of your Notice of Case Closure and Right to Sue.

Pursuant to Government Code section 12962, DFEH will not serve these documents on the employer. You must serve the complaint separately, to all named respondents. Please refer to the attached Notice of Case Closure and Right to Sue for information regarding filing a private lawsuit in the State of California. A courtesy "Notice of Filing of Discrimination Complaint" is attached for your convenience.

Be advised that the DFEH does not review or edit the complaint form to ensure that it meets procedural or statutory requirements.

Sincerely,

Department of Fair Employment and Housing



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

KEVIN KISH, DIRECTOR

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
(800) 884-1684 (Voice) | (800) 700-2320 (TTY) | California's Relay Service at 711
<http://www.dfeh.ca.gov> | Email: contact.center@dfeh.ca.gov

April 30, 2021

RE: Notice of Filing of Discrimination Complaint
DFEH Matter Number: 202104-13423230
Right to Sue: Hopkins / RIVERSIDE TELEVISION SERVICES, LLC et al.

To All Respondent(s):

Enclosed is a copy of a complaint of discrimination that has been filed with the Department of Fair Employment and Housing (DFEH) in accordance with Government Code section 12960. This constitutes service of the complaint pursuant to Government Code section 12962. The complainant has requested an authorization to file a lawsuit. A copy of the Notice of Case Closure and Right to Sue is enclosed for your records.

This matter may qualify for DFEH's Small Employer Family Leave Mediation pilot program. Under this program, established under Government Code section 12945.21, a small employer with 5 -19 employees, charged with violation of the California Family Rights Act, Government Code section 12945.2, has the right to participate in DFEH's free voluntary mediation service. Under this program both the employee requesting an immediate right to sue and the employer charged with the violation may request that all parties participate in DFEH's free voluntary mediation service. A request for mediation must be made within 30 days of receipt of the Notice of Case Closure and Right to Sue. If mediation is requested, the employee is prohibited from filing a civil action until mediation is complete. The employee's statute of limitations to file a civil action, including for all related claims not arising under section 12945.2, is tolled from DFEH's receipt of a mediation request under section 12945.21 until mediation is complete. To request DFEH Small Employer Family Leave Mediation, email DRDOnlineRequests@dfeh.ca.gov and include the DFEH matter number indicated on the Right to Sue notice.

Please refer to the attached complaint for a list of all respondent(s) and their contact information.

No response to DFEH is requested or required.

Sincerely,

Department of Fair Employment and Housing



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

KEVIN KISH, DIRECTOR

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
(800) 884-1684 (Voice) | (800) 700-2320 (TTY) | California's Relay Service at 711
<http://www.dfeh.ca.gov> | Email: contact.center@dfeh.ca.gov

April 30, 2021

Joel Hopkins
24548 Peachland Ave.
Santa Clarita, California 91321

RE: **Notice of Case Closure and Right to Sue**
DFEH Matter Number: 202104-13423230
Right to Sue: Hopkins / RIVERSIDE TELEVISION SERVICES, LLC et al.

Dear Joel Hopkins:

This letter informs you that the above-referenced complaint filed with the Department of Fair Employment and Housing (DFEH) has been closed effective April 30, 2021 because an immediate Right to Sue notice was requested.

This letter is also your Right to Sue notice. According to Government Code section 12965, subdivision (b), a civil action may be brought under the provisions of the Fair Employment and Housing Act against the person, employer, labor organization or employment agency named in the above-referenced complaint. The civil action must be filed within one year from the date of this letter.

This matter may qualify for DFEH's Small Employer Family Leave Mediation pilot program. Under this program, established under Government Code section 12945.21, a small employer with 5 -19 employees, charged with violation of the California Family Rights Act, Government Code section 12945.2, has the right to participate in DFEH's free voluntary mediation service. Under this program both the employee requesting an immediate right to sue and the employer charged with the violation may request that all parties participate in DFEH's free voluntary mediation service. A request for mediation must be submitted to the DFEH within 30 days of receipt of the Notice of Case Closure and Right to Sue. If mediation is requested, the employee is prohibited from filing a civil action until mediation is complete. The employee's statute of limitations to file a civil action, including for all related claims not arising under section 12945.2, is tolled from DFEH's receipt of a mediation request under section 12945.21 until mediation is complete. To request DFEH Small Employer Family Leave Mediation, email DRDOnlineRequests@dfeh.ca.gov and include the DFEH matter number indicated on the Right to Sue notice.

To obtain a federal Right to Sue notice, you must contact the U.S. Equal Employment Opportunity Commission (EEOC) to file a complaint within 30 days of receipt of this DFEH Notice of Case Closure or within 300 days of the alleged discriminatory act, whichever is earlier.

Sincerely,



STATE OF CALIFORNIA | Business, Consumer Services and Housing Agency

GAVIN NEWSOM, GOVERNOR

DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

KEVIN KISH, DIRECTOR

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
(800) 884-1684 (Voice) | (800) 700-2320 (TTY) | California's Relay Service at 711
<http://www.dfeh.ca.gov> | Email: contact.center@dfeh.ca.gov

Department of Fair Employment and Housing

UNRELEASED
Deadline

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**COMPLAINT OF EMPLOYMENT DISCRIMINATION
BEFORE THE STATE OF CALIFORNIA
DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING
Under the California Fair Employment and Housing Act
(Gov. Code, § 12900 et seq.)**

In the Matter of the Complaint of

Joel Hopkins

DFEH No. 202104-13423230

Complainant,

vs.

RIVERSIDE TELEVISION SERVICES, LLC
500 S. Buena Vista St.
Burbank, California 91521

The Walt Disney Company
500 S Buena Vista St
Burbank, California 91521

ABC Signature Studios, Inc.
500 S. Buena Vista St.
Burbank, California 91521

Respondents

1. Respondent RIVERSIDE TELEVISION SERVICES, LLC is an employer RIVERSIDE TELEVISION SERVICES, LLC subject to suit under the California Fair Employment and Housing Act (FEHA) (Gov. Code, § 12900 et seq.).

2. Complainant is naming The Walt Disney Company business as Co-Respondent(s). Complainant is naming ABC Signature Studios, Inc. business as Co-Respondent(s).

3. Complainant Joel Hopkins, resides in the City of Santa Clarita, State of California.

4. Complainant alleges that on or about April 16, 2021, respondent took the following adverse actions:

Complainant was discriminated against because of complainant's sexual orientation and as a result of the discrimination was denied hire or promotion, denied equal pay, denied any employment benefit or privilege, denied work opportunities or assignments.

1 **Additional Complaint Details:** I began my employment in or around 1994. Within the first
2 six years of my employment, I received two promotions. However, for approximately the past
3 20 years of my employment, I have experienced an ongoing pattern of discrimination where
4 I have been passed over for promotions and have not received any further promotions. I
5 believe the discriminatory conduct is due to my sexual orientation as a gay man.

6 I am informed and believe that in or around April 2021, several promotions occurred.
7 I was not promoted. I believe these promotions occurred despite representations that the
8 company was hurting financially and was not promoting.

9 I am also informed and believe that my compensation is less than other individuals
10 who are also department heads at my employer.

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1 VERIFICATION

2 I, **Joel Hopkins**, am the **Complainant** in the above-entitled complaint. I have read
3 the foregoing complaint and know the contents thereof. The same is true of my own
4 knowledge, except as to those matters which are therein alleged on information and
belief, and as to those matters, I believe it to be true.

5 On April 30, 2021, I declare under penalty of perjury under the laws of the State of
6 California that the foregoing is true and correct.

7 **Santa Clarita, CA**

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