

# EXHIBIT A

# Protocols Reminder



## COVID-19 Scenarios for DPEP Cast Working at the Florida Site

### COVID-19 SCENARIOS FOR DPEP CAST WORKING AT FLORIDA SITE (Regardless of vaccination status)

#### **POSITIVE COVID-19**

- Isolate at home and do not report to work for five days, or longer if symptoms continue. After the isolation period, you must wear a face covering (indoors and outdoors) for an additional five days. During those additional five days at work, maintain six-feet physical distancing when your face covering is temporarily removed to actively eat and drink. Immediately [open a COVID-19 inquiry in D Tools HR](#) to report your COVID-19 case.
  - Please send your positive COVID test result to [DPEP.Contact.Tracing@disney.com](mailto:DPEP.Contact.Tracing@disney.com).
- If you are unable to wear a face covering while working, you must isolate at home and not report to work for ten days, or longer if symptoms continue.

#### **EXPOSED TO COVID-19 AND SYMPTOMATIC**

- Quarantine at home and do not report to work for five days, or longer if symptoms continue. After the quarantine period, you must wear a face covering (indoors and outdoors) for an additional five days. During those additional five days at work, maintain six-feet physical distancing when your face covering is temporarily removed to actively eat and drink. If possible, get tested for COVID-19. [Open a COVID-19 inquiry in D Tools HR](#) to report your exposure.
- If you are unable to wear a face covering while working, you must stay at home and not report to work for ten days following exposure, or longer if symptoms continue.

#### **EXPOSED TO COVID-19 AND ASYMPTOMATIC**

- Continue to report to work if you do not have symptoms. You must wear a face covering (indoors and outdoors) for 10 days following the exposure, and maintain six-feet physical distancing when your face covering is temporarily removed to actively eat and drink. If possible, get tested for COVID-19 five days after exposure.
- If you are unable to wear a face covering while working, you must stay at home and not report to work for ten days following exposure.

#### **NEGATIVE COVID-19, BUT DISPLAYING SYMPTOMS OR SICK**

- Stay at home and do not report to work until well. Follow your standard call-in procedures. There is no need to contact GHRO unless you become symptomatic or positive for COVID-19.

# EXHIBIT B

# Important Company Message

Friday, July 30, 2021



CONTRIBUTED BY

**Paul Richardson**

Senior Executive Vice President and Chief Human Resources Officer, The Walt Disney Company

english • español • kreyòl ayisyen

Dear Colleague,

One thing that has remained true and constant during the course of the COVID-19 pandemic is how quickly things can change. This has been an incredibly challenging time for everyone, and it requires agility, flexibility and perseverance.

We've been closely monitoring the impact of the pandemic on our communities and, as always, we believe it is important to put the safety of our Employees and Cast Members at the forefront.

Toward that end, and based on the recommendations of scientists, health officials and our own medical professionals that the COVID-19 vaccine provides the best protection against severe infection, we are now requiring that all salaried and non-union hourly employees in the U.S. working at any of our sites be fully vaccinated. Employees who aren't already vaccinated and are working on-site will have 60 days from today to complete their protocols and any employees still working from home will need to provide verification of vaccination prior to their return, with certain exceptions.

We have also begun conversations around this topic with the unions representing our employees under collective bargaining agreements. In addition, all new hires will be required to be fully vaccinated before beginning employment.

We are developing plans and protocols for employees outside the U.S.

You can find information about COVID-19 vaccines on the [Staying Healthy](#) site.

We are also adjusting the return-to-office timeline we announced at the end of June. We have decided to delay that return for now and those who are working remotely should continue to do so. Leaders and HR business partners will contact employees who have recently been asked to come back to the office with specific next steps. Each of our businesses and locations will determine what is best for its workforce given local conditions. As promised, we will try to provide a minimum of 30-days' notice to help you successfully plan to be back in the office when the time comes.

I know you'll have questions about our policies, including limited exceptions, and future plans. Information can be found on the [Moving Forward, Together](#) site. We will provide more details as soon as they are determined.

Thank you for your flexibility and understanding as we navigate this phase of the pandemic. Stay safe.

Best,

Paul

# EXHIBIT C

**From:** Disney Health and Safety Team <[Disney.Health.and.Safety.Team@twdc.com](mailto:Disney.Health.and.Safety.Team@twdc.com)>

**Date:** November 19, 2021 at 2:07:00 PM EST

**To:** [adampajer@icloud.com](mailto:adampajer@icloud.com)

**Subject: Update on Company Vaccination Policy**

**Reply-To:** [TWDC.GHRO.Services@disney.com](mailto:TWDC.GHRO.Services@disney.com)

This update is being shared with you based on your residence and/or work in Florida and because you have not yet verified your COVID-19 vaccination status with the company and you have not been granted an accommodation.

As you know, in July the company announced that based on the recommendations of scientists, health officials, and our own medical professionals that the COVID-19 vaccine provides the best defense against the virus, the company was implementing a mandatory vaccination policy. Under our policy, all U.S.-based salaried and hourly non-union employees, as well as employees covered by a collective bargaining agreement that adopts this policy, are required to be fully vaccinated against COVID-19 as a condition of their continued employment. The company's view of the wisdom of that approach has not changed.

We remain confident in the approach we have taken with our mandatory vaccine policy for Florida-based Cast Members and employees, with more than 90% of our active Florida-based Cast Members and employees having verified that they are fully vaccinated, and we consider this to be very successful.

Due to the passage this week of a new Florida law on employer vaccine mandates, and the federal OSHA Emergency Temporary Standard mandating the vaccine being stayed, we must pause the enforcement of our policy for Florida-based Cast Members and employees.

Specifically,

- As we assess the full impact of this new legislation, we are immediately pausing the enforcement of our mandatory vaccination policy for Florida-based Cast Members and employees until further notice.
- If you have not verified that you are fully vaccinated, you will be required to follow our [safety protocols](#) for unvaccinated Cast Members and employees, including face coverings and physical distancing.
- While you do not currently have to verify vaccination status, you may still do so through the TrustAssure process. Cast Members and employees who do not verify vaccination status through the TrustAssure process will be considered as unvaccinated.
- If you have made a request for an accommodation exempting you from the company's vaccine mandate, that request will be considered on hold for the time being and will not be evaluated by the company. Should the company later resume its accommodations process in Florida, your request for accommodation will be evaluated at that time.

Further updates will be provided at a later date.

Thank you for your flexibility and understanding as we navigate this phase of the pandemic. Please contact your HR business partner if you have any questions.

# EXHIBIT D

# LEADER RESOURCE



## Augmented Safety Protocols

Date: Dec 10, 2021

**\*\*FOR VERBAL USE ONLY\*\***

**FOR: DPEP salaried leaders of Cast Members who must follow Augmented Safety Protocols at WDW**

**\*\* Do not copy, forward or post this information. \*\***

<b>Summary</b>	<p>Beginning Dec. 13, select salaried leaders at Walt Disney World Resort will begin receiving a weekly email notification <b>if they have a Cast Member(s) who is required to follow Augmented Safety Protocols</b>. The email will be <u>sent to the direct leader listed in SAP</u>. The email will have a link and requires the leader to sign in using their HUB login and password to access their list. The list should not be forwarded internally or externally and should be handled with utmost confidentiality.</p> <p>Cast Members who are initially listed may come off the list if they complete the verification process through TrustAssure. This Leader Resource provides information and guidance that can be used when responding to Cast Members who have questions.</p>
<b>Augmented Safety Protocols</b>	<p>The following Augmented Safety Protocols must be followed while working onsite at Walt Disney World Resort:</p> <ol style="list-style-type: none"><li>1. Required to be six feet from others when removing a Disney-supplied face covering to actively eat or drink.</li><li>2. Whether indoors or outdoors, a Disney-supplied face covering must be worn at all times. In addition, when within three feet of others and indoors, a face shield or safety glasses must also be worn.<ul style="list-style-type: none"><li>• Cast Members can remove their face covering when:<ol style="list-style-type: none"><li>1. Alone in an office with the door shut</li><li>2. Performing an approved green zone task</li><li>3. While actively performing onstage in a COVID-blocked entertainment offering and maintaining six feet from others</li><li>4. When six feet from others and actively eating or drinking</li></ol></li></ul></li><li>3. Instead of a Disney-supplied face covering (i.e., pixie), Cast Members in high contact roles are required to wear a Disney-supplied N95 mask plus a face shield or safety glasses when within three feet from others. <b><u>If your Cast Member has indoor extended interaction with any individual within three feet, please contact your local Safety Professional for further review and instructions.</u></b> Indoor extended interaction is defined as multiple interactions indoors with the same individual within three feet (no barrier) that cumulatively add up to an hour over a single shift.</li></ol>
<b>Information and Process For Required N95 Mask Usage</b>	<ul style="list-style-type: none"><li>• Instead of a Disney-supplied face covering (i.e., pixie), <b>Cast Members in high contact roles are required to wear a Disney-supplied valveless N95 mask plus a face shield or safety glasses when within three feet from others.</b></li></ul>



# LEADER RESOURCE



## Augmented Safety Protocols

Date: Dec 10, 2021

**\*\*FOR VERBAL USE ONLY\*\***

FOR: DPEP salaried leaders of Cast Members who must follow Augmented Safety Protocols at WDW

<p><b>Information and Process For Required N95 Mask Usage (continued)</b></p>	<p><b>Process for Cast Members required to wear a Disney-supplied valveless N95 mask:</b></p> <ul style="list-style-type: none"><li>• Leader should contact their local Safety Professional to review the Cast Member's role and verify that it meets the criteria of a high contact role. If the Safety Professional confirms the criteria, then the leader should contact the Coordinator of Training (COT) to enroll the Cast Member in the required training and to complete a fit test at Health Services.</li><li>• Leader confirms with the Cast Member they understand the requirement and reviews the protocols.</li><li>• Leader assists Cast Member with the following steps as set up by the COT, which must be completed on paid time:<ol style="list-style-type: none"><li>1. <b>Complete the "Safety Protocols – N95" in D Learn</b> Training takes approximately 10 minutes and is available in English, Spanish, Haitian Creole and Vietnamese. Leaders may contact their local area COT for assistance as needed.</li><li>2. <b>Pick up valveless N95 mask</b> N95 masks are available at most Costuming issue locations (if needed, the Cast Member should also pick up a face shield or safety goggles).</li><li>3. <b>Visit Cast Health Services for mask-wearing procedures</b> An appointment must be made with Cast Health Services, where Cast will bring their valveless N95 mask to ensure a proper fit and learn the appropriate wearing procedures. Upon completion, Health Services will mark this as a completed training requirement in D Learn.</li><li>4. <b>Cast Member completes "N95 Acknowledgement" in D Learn</b></li></ol></li></ul>
<p><b>The Leader's Role</b></p>	<ul style="list-style-type: none"><li>• As a reminder, leaders are required as part of their regular day-to-day responsibilities to <b>enforce applicable safety protocols</b>. Leaders know their Cast Members best and how to assist and provide additional guidance as needed. If you observe a Cast Member who is not adhering to the safety protocols, immediately address the situation as a safety violation. Show care and compassion by having the conversation in a private setting whenever possible, given the potential for the discussion to turn to sensitive topics.<ul style="list-style-type: none"><li>○ Failure to adhere to these protocols is considered a safety violation, which can result in disciplinary action up to termination.</li><li>○ If a Cast Member refuses to follow instructions about these protocols, it will be considered insubordination, which can result in termination.</li></ul></li><li>• <b>Familiarize yourselves with the Augmented Safety Protocols</b> (as listed above).</li><li>• <b>Ensure all required training is complete</b>, including for Cast who must use a N95 mask.</li></ul>

# LEADER RESOURCE



## Augmented Safety Protocols

Date: Dec 10, 2021

**\*\*FOR VERBAL USE ONLY\*\***

**FOR: DPEP salaried leaders of Cast Members who must follow Augmented Safety Protocols at WDW**

	<p><b><u>Leader Call-to-Action</u></b></p> <ul style="list-style-type: none"><li>• Leadership presence is so important; thank you for continuing to walk all work areas and breakrooms on a regular basis to help answer questions and visually scan for compliance.</li><li>• If you observe a Cast Member who is not adhering to the safety protocols, immediately address the situation as a safety violation. Address any situations courteously and discreetly, and bring the Cast Member into a private setting whenever possible.</li><li>• As always, engage your direct leader, local area HR Business Partner or Safety Professional if you have any questions or need additional support.</li></ul>
<p><b><i>Reactive Cast FAQs</i></b></p>	<p><b>Why do I have to follow Augmented Safety Protocols? Why do I have to wear a face covering and a face shield or safety glasses?</b> These safety protocols are in place for those who have not verified their vaccination status through TrustAssure.</p> <p><b>I already have an approved accommodation; do I need to do anything differently?</b> Cast with an approved accommodation should continue to follow safety protocols communicated to them.</p> <p><b>Does the new Florida law allow for these Augmented Safety Protocols?</b> Yes. We have paused until further notice the enforcement of our mandatory vaccine policy for Florida-based Cast Members and employees. However, we continue to focus on the safety and well-being of our Cast Members and Guests and remain committed to implementing safety protocols that help prevent the spread of the COVID-19 virus.</p> <p><b>Why are some Cast required to wear a N95 mask instead of a Disney-supplied face covering?</b> These safety protocols are in place for those who have not verified their vaccination status through TrustAssure. A N95 mask is required for higher contact roles with indoor extended interaction with another individual.</p> <p><b>What happens if I don't follow the Augmented Safety Protocols?</b> Non-compliance with the Augmented Safety Protocols may result in disciplinary action, up to and including termination.</p> <p><b>Do these Augmented Safety Protocols apply to Cast who verified their vaccination status through TrustAssure?</b> No.</p>

# EXHIBIT E



9205+/9210+/\*37192,  
9211+/37193\*

## Aura™ Particulate Respirator N95

*User Instructions*

**IMPORTANT:** *Keep User Instructions for reference*

\*37192 and 37193 are catalog numbers only. NIOSH approved as 3M™ Particulate Respirator N95 9210+ and 3M™ Particulate Respirator N95 9211+. See insert for approval label.

98-0060-0208-7\_2

## Respirateur N95 contre les particules Aura™

*Directives d'utilisation*

**IMPORTANT :** Conserver ces *directives d'utilisation* à titre de référence.

\*Les numéros 37192 et 37193 ne sont que des numéros de référence. Homologués par le NIOSH sous les désignations suivantes : respirateur N95 9210+ 3M™ contre les particules et respirateur N95 9211+ 3M™ contre les particules. Consulter l'encart pour l'étiquette d'homologation.

## Respirador para partículas N95 Aura™

*Instrucciones*

**IMPORTANTE:** Conserve estas *Instrucciones* para referencia futura.

\*37192 y 37193 sólo son números de catálogo. Aprobado por el Instituto Nacional de Seguridad y Salud Ocupacional (NIOSH por sus siglas en inglés) como Respirador para partículas 3M™ N95 9210+ y Respirador para partículas 3M™ N95 9211+. Consulte la etiqueta de aprobación en el inserto incluido.

## Aura™ 防護マスク N95

重要：参考としてこの取扱説明書を保管しておいてください。

\*37192と37193はカタログ上の番号です。NIOSHは3 M™防護マスク9210+N95、3 M™ 防護マスク 9211+N95として認定しています。このマスクは労働安全衛生法に定める防じんマスクではありません。

## Aura™ 粒狀物呼吸防護口罩 N95

*使用說明 重要：保留此份說明以供參考。*

\*37192 及 37193 僅為分類號碼。NIOSH 認證為 3M™ Particulate Respirator N95 9210+ 及 3M™ Particulate Respirator N95 9211+。請見內部證明標籤。

## Aura™ 안면부여과식 방진마스크 N95

### 등급

**중요: 마스크 착용전에 반드시 착용방법을 읽고  
숙지해야 합니다.**

\* 37192 와 37193 은 카다로그 참조번호입니다. 9210+ 와 9211+는 NIOSH 인증을 받은 N95등급의 방진 마스크입니다.



## ⚠️ WARNING

This respirator helps protect against certain particles. **Misuse may result in sickness or death.** For correct use, consult supervisor, and *User Instructions*, or call 3M in U.S.A., 1-800-243-4630. In Canada, call Technical Service at 1-800-267-4414.

### IMPORTANT

Before use, wearer must read and understand these *User Instructions*. Keep *User Instructions* for reference.

### Use For

Particles such as those from grinding, sanding, sweeping, sawing, bagging, or processing minerals, coal, iron ore, flour, metal, wood, pollen, and certain other substances. Liquid or non-oil based particles from sprays that do not also emit oil aerosols or vapors. Follow all applicable local regulations. In the U.S., for additional information on 3M use recommendations for this class of respirator please consult the 3M Respirator Selection Guide found on the 3M PSD web site at [www.3M.com/PPESafety](http://www.3M.com/PPESafety) or call 1-800-243-4630. In Canada call 1-800-267-4414.

### Do Not Use For

Do not use for gases and vapors, oil aerosols, or sandblasting, unless nozzle and blast are physically separated from the operator in an exhaust-ventilated enclosure; particulate concentrations that exceed either 10 times the occupational exposure limit or applicable government regulations, whichever is lower. This respirator does not supply oxygen. In the U.S., do not use when OSHA substance specific standards, such as those for asbestos, arsenic, cadmium, lead in the construction industry, or 4,4'-methylene dianiline (MDA), specify other types of respiratory protection.

### Biological Particles

This respirator can help reduce inhalation exposures to certain airborne biological particles (e.g. viruses, mold, *Bacillus anthracis*, *Mycobacterium tuberculosis*, etc.) but cannot eliminate the risk of contracting infection, illness or disease. OSHA and other government agencies have not established safe exposure limits for these contaminants.

### Use Instructions

1. Failure to follow all instructions and limitations on the use of this respirator and/or failure to wear this respirator during all times of exposure can reduce respirator effectiveness and **may result in sickness or death.**
2. Before occupational use of this respirator, in the U.S. a written respiratory protection program must be implemented meeting all the requirements of OSHA 29 CFR 1910.134 such as training, fit testing, medical evaluation, and applicable OSHA substance specific standards. In Canada, CSA standard Z94.4 requirements must be met and/or requirements of the applicable jurisdiction, as appropriate.
3. The particles which can be dangerous to your health include those so small that you cannot see them.
4. Leave the contaminated area immediately and contact supervisor if dizziness, irritation, or other distress occurs.
5. Store the respirator away from contaminated areas when not in use.
6. Inspect respirator before each use to ensure that it is in good operating condition. Examine all the respirator parts for signs of damage including the two headbands, staples, noseclip, and nosefoam. The respirator should be disposed of immediately upon observation of damaged or missing parts. Filtering facepieces are to be inspected prior to each use to assure there are no holes in the breathing zone other than the punctures around staples and no damage has occurred. Enlarged holes resulting from ripped or torn filter material around staple punctures are considered damage. Immediately replace respirator if damaged. Staple perforations do not affect NIOSH approval.

7. Dispose of used product in accordance with applicable regulations.

### Use Limitations

1. This respirator does not supply oxygen. Do not use in atmospheres containing less than 19.5% oxygen.
2. Do not use when concentrations of contaminants are immediately dangerous to life or health, are unknown or when concentrations exceed 10 times the permissible exposure limit (PEL) or according to specific OSHA standards or applicable government regulations, whichever is lower.
3. Do not alter, abuse, wash or misuse this respirator.
4. Do not use with beards or other facial hair or other conditions that prevent a good seal between the face and the sealing surface of the respirator.
5. Respirators can help protect your lungs against certain airborne contaminants; however, they will not prevent entry through other routes such as the skin, which would require additional personal protective equipment (PPE).
6. This respirator is designed for occupational/professional use by adults who are properly trained in their use and limitations. This respirator is not designed to be used by children.
7. Individuals with a compromised respiratory system, such as asthma or emphysema, should consult a physician and complete a medical evaluation prior to use.
8. When stored in accordance with temperature and humidity conditions specified below, the product may be used until the “use by” state specified on packaging.

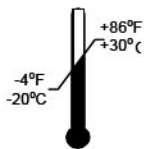
### Storage Conditions and Shelf Life

Before use, store respirators in the original packaging, away from contaminated areas, dust, sunlight, extreme temperatures, excessive moisture and damaging chemicals. When stored in accordance with temperature and humidity conditions specified below, the product may be used until the “use by” date specified on packaging. Always inspect product and conduct a user seal check before use as specified in *User Instructions*. **If you cannot achieve a proper seal, do not use the respirator.**



End of Shelf Life

Use respirators before the “use by” date specified on packaging



Storage Temperature Range

-20°C (-4°F) to +30°C (+86°F).



Storage Maximum Relative Humidity

<80% RH

### Time Use Limitations

If respirator becomes damaged, soiled, or breathing becomes difficult, leave the contaminated area immediately and replace the respirator.

### Fitting Instructions

**Must be followed each time respirator is worn.**



Fig. 1a

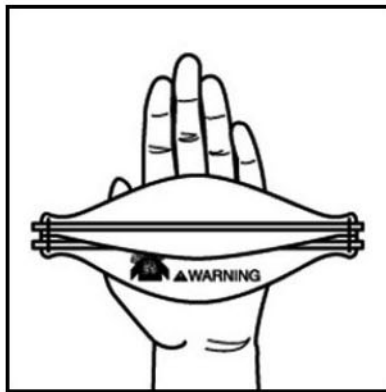


Fig. 1b

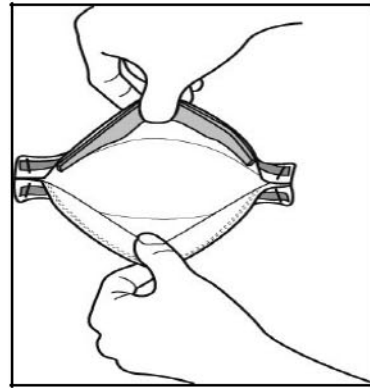


Fig. 2



Fig. 3a



Fig. 3b

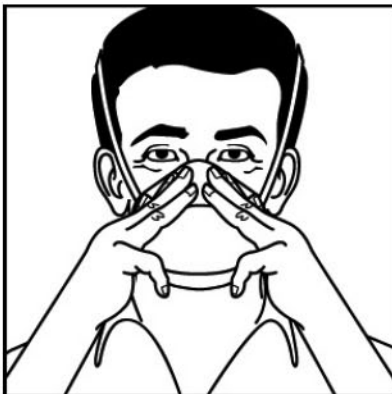


Fig. 4



Fig. 5

1. Remove respirator from packaging and hold with straps facing upward (1a). Place bottom strap under center flaps next to **WARNING** statement as shown (1b).
2. Fully open top and bottom panels, bending nosepiece around thumb at center of foam. Straps should separate when panels are opened. Make certain bottom panel is unfolded and completely opened.




3. Place respirator on your face so that the foam rests on your nose and the bottom panel is open under chin. Hold the bottom panel securely under your chin. Pull the top strap over your head and position it high on the back of the head (3a). Then pull the bottom strap over your head and position it around the neck and below the ears (3b). Adjust for a comfortable fit by pulling top panel toward the bridge of the nose and bottom panel under chin.
4. Place your fingertips from both hands at the top of the metal nosepiece. Using two hands, mold the nose area to the shape of your nose by pushing inward while moving your fingertips down both sides of the nosepiece.  
! Pinching the nosepiece using one hand may result in improper fit and less effective respirator performance. Use two hands.
5. Perform a User Seal Check prior to each wearing. To check the respirator-to-face seal, cover the middle panel with one or both hands. For the 9205+ and 9210+ respirator, inhale and exhale sharply. For the 9211+ respirator, inhale sharply. Be careful not to disturb the position of the respirator. If air leaks around the nose, readjust the nosepiece as described in step 4. If air leaks around respirator edges, adjust panels and straps. **If you CANNOT achieve a proper fit, DO NOT enter the contaminated area. See your supervisor.**

### Removal Instructions


Cup respirator in hand to maintain position on face and pull bottom strap over head. Still holding the respirator in position, pull top strap over head and remove respirator.

### NIOSH Approved: N95

At least 95% filtration efficiency against solid and liquid aerosols that do not contain oil.



**3M**  
St. Paul, Minnesota, USA  
1-800-243-4630  
9210+, 9211+ & 9205+ Respirators



THESE RESPIRATORS ARE APPROVED ONLY IN THE FOLLOWING CONFIGURATIONS:

RESPIRATOR COMPONENTS					
FILTERING FACEPIECE					
TC-	PROTECTION <sup>1</sup>	9210+	9211+	9205+	CAUTIONS AND LIMITATIONS <sup>2</sup>
34A-5505	N95	X			ABCJMNOF
34A-5509	N95		X		ABCJMNOF
34A-5590	N95			X	ABCJMNOF

**1. PROTECTION**  
N95 - Particulate Filter (95% filter efficiency level) effective against particulate aerosols free of oil. Some use restrictions may apply.

**2. CAUTIONS AND LIMITATIONS**

- A - Not for use in atmospheres containing less than 19.5 percent oxygen
- B - Not for use in atmospheres immediately dangerous to life or health
- C - Do not exceed maximum use concentrations established by regulatory standards
- J - Failure to properly use and maintain this product could result in injury or death
- M - All approved respirators shall be selected, fitted, used and maintained in accordance with MSHA, OSHA and other applicable regulations
- N - never substitute, modify, add, or omit parts. Use only exact replacement parts in the configuration as specified by the manufacturer
- O - Refer to User's Instructions, and / or maintenance manuals for information on use and maintenance of these respirators
- P - NIOSH does not evaluate respirators for use as surgical masks.

Rev. B: 03-23-2020

This respirator contains no components made from natural rubber latex.

**FOR MORE INFORMATION**

**In United States, contact:**

Website: [www.3M.com/PPESafety](http://www.3M.com/PPESafety)

Technical Assistance: 1-800-243-4630

**For other 3M products:**

1-800-3M-HELPS or 1-651-737-6501

**3M Personal Safety Division**

3M Center, Building 0235-02-W-70

St. Paul, MN 55144-1000

© 3M 2020. All rights reserved.

3M is a trademark of 3M Company, used under  
license in Canada

98-0060-0208-7\_2

# EXHIBIT F

----- Forwarded message -----

From: **Disney Health and Safety Team** <[Disney.Health.and.Safety.Team@twdc.com](mailto:Disney.Health.and.Safety.Team@twdc.com)>

Date: Tue, Aug 16, 2022, 12:00 PM

Subject: Important Health & Safety Update

To: <[GOLDTOYS@gmail.com](mailto:GOLDTOYS@gmail.com)>

**To: All DPEP Cast Members and Florida-site employees subject to Augmented Health & Safety Protocols**

We wanted to make you aware of an important update to our Company Health & Safety Protocols.

**Effective today, Tuesday, Aug. 16, our Augmented Health and Safety Protocols are being modified across U.S.-based Disney Parks, Experiences, and Products as well as our Florida campuses and offices. As a result, employees and cast members within these segments/campuses who are not verified as fully vaccinated are no longer required to wear a face covering while working indoors or maintain physical distancing (six ft. of distance from others) when not wearing a face covering.**

All employees and cast members, regardless of vaccination status, are encouraged to wear a face covering if they feel more comfortable doing so. There may be select roles (e.g., production) that still require the use of a face covering while indoors.

As a reminder, you can explore the remaining Company Health and Safety Protocols on [My Disney Today > Important Information](#). If you have any questions about this update, please contact your leader or HRBP.

*These protocols are subject to change at any time. Employees represented by a union/Return-to-Work Agreement, please consult your leader to understand what protocols apply to you.*

# EXHIBIT G

**COVID-19 Vaccination Accommodation Request Form**

If you are requesting an exception to the Company's mandatory vaccination policy due to your (1) disability or medical condition, or (2) sincerely held religious belief, practice or observance, please complete this form and submit it to TWDC.GHRO.Leaves.Team@disney.com.

- 1. If you are unable to receive a COVID-19 vaccination due to a disability or medical condition:
  - a. Please explain the nature of the limitations resulting from your disability or medical condition and how they prevent you from receiving a COVID-19 vaccination. (Please do not disclose the underlying condition or any genetic information.)

---



---



---

- b. Is your limitation that prevents you from receiving the COVID-19 vaccination permanent or temporary? If temporary, when will you be able to receive the COVID-19 vaccination?

---

- c. Please attach documentation from your medical provider confirming the existence of a disability or medical condition, the duration and resulting limitations, and providing information about how those limitations prevent you from receiving the COVID-19 vaccination. (Please do not disclose the underlying condition or any genetic information.)

The Company may ask to discuss your request with your doctor if the documentation provided is not sufficient to evaluate your accommodation request.

- 2. If you are unable to receive a COVID-19 vaccination due to a sincerely held religious belief, practice or observance, please explain the nature of your religious belief, practice or observance and how it prevents you from receiving a COVID-19 vaccination.

Please see attached explanation of my sincerely and deeply held ethical, moral, + religious beliefs.

---



---

If necessary to evaluate your accommodation request, the Company may ask to discuss the nature of your religious belief, practice or observance and accommodation request with your religion's spiritual leader (if applicable) or another third party who is aware of your religious belief, practice, or observance.

**Verification:**

I verify that the above information is true and accurate and I understand that any misrepresentation may result in disciplinary action, including termination of employment.

Name: Barbara B. Andreas Date: 8/20/21  
 Signature: Barbara B. Andreas Personnel Number (PERNR): 92011991  
 Phone Number: 908-596-1229

## **Barbara B. Andreas**

Guest Experience Manager, ESPN

Pnr 92011991

10353 134<sup>th</sup> Court, Fellsmere, FL 32948

[Barbara.B.Andreas@Disney.com](mailto:Barbara.B.Andreas@Disney.com)

908-596-1229

To: The Walt Disney World Company HR

Re: Religious Exemption for Covid-19 Vaccinations, Covid-19 Testing, and Face Coverings

I hereby request a religious exemption from any and all Covid-19 vaccinations, Covid-19 testing, and the wearing of a face covering. These are my sincerely and deeply held ethical, moral & religious beliefs.

### **Vaccinations**

*(Proverbs 6:16-18) 16 There are six things the LORD hates, seven that are detestable to him...hands that shed innocent blood, 18 a heart that devises wicked schemes...*

*(Psalm 22:10 10) From birth I was cast on you; from my mother's womb you have been my God.*

My religious beliefs condemn abortion. Vaccines contain aborted fetal cells. While the most commonly used cells for vaccines are labeled "MRC5" and "WI38," as many as 80 aborted babies are used in the creation of one vaccine. Some undergoing a cruel "water bag" abortion, to harvest the cells in the freshest manner. Both Pfizer and Moderna used the fetal cell line "HEK 293" in the confirmation phase to ensure the vaccines work. Johnson & Johnson infects "PER.C6" fetal cell lines with adenovirus to create their vaccine.

*(Leviticus 17:11) For the life of the flesh is in the blood: and I have given it to you on the altar to make an atonement for your souls: for it is the blood that maketh an atonement for the soul.*

In the Bible, blood represents the life force of humans. Human blood is to be kept pure under all circumstances and free from contaminants. Vaccine ingredients are considered contaminants from a biblical perspective and contain neurotoxins, hazardous substances, attenuated viruses, animal parts, foreign DNA, carcinogens, and aborted fetal cells.

The Pfizer-BioNTech COVID-19 Vaccine includes the following ingredients: mRNA, lipids ((4-hydroxybutyl)azanediyl)bis(hexane-6,1-diyl)bis(2-hexyldecanoate), 2 [(polyethylene glycol)-2000]-N,N-ditetradecylacetamide, 1,2-Distearoyl-sn-glycero-3-phosphocholine, and cholesterol), potassium chloride, monobasic potassium phosphate, sodium chloride, dibasic sodium phosphate dihydrate, and sucrose.

The Moderna COVID-19 Vaccine contains the following ingredients: messenger ribonucleic acid (mRNA), lipids (SM-102, polyethylene glycol [PEG] 2000 dimyristoyl glycerol [DMG], cholesterol,

and 1,2-distearoyl-sn-glycero-3-phosphocholine [DSPC]), tromethamine, tromethamine hydrochloride, acetic acid, sodium acetate trihydrate, and sucrose.

The Janssen COVID-19 Vaccine includes the following ingredients: recombinant, replication-incompetent adenovirus type 26 expressing the SARS-CoV-2 spike protein, citric acid monohydrate, trisodium citrate dihydrate, ethanol, 2-hydroxypropyl- $\beta$ -cyclodextrin (HBCD), polysorbate-80, sodium chloride.

*(1 Corinthians 6:19-20) Do you not know that your bodies are temples of the Holy Spirit, who is in you, whom you have received from God? You are not your own; you were bought at a price. Therefore honor God with your bodies.*

This means we are all made in God's image and need to keep our bodies pure and free from harmful substances and influences. Section 13.1 of every vaccine insert states that the product has never been tested for mutagenic, carcinogenic or fertility impairment. God & family are at the core of our values, and it's against our religious beliefs to inject foreign substances or perform procedures on our bodies with the risk of prohibiting the ability to create life or sustain a healthy life.

*(Jeremiah 30:17) But I will restore you to health and heal your wounds,' declares the LORD.*

In addition, these beliefs also pertain to **Covid-19 testing**. Testing swabs are sterilized with ethylene oxide, a known carcinogen. Even if the possibility is only a trace or miniscule amount, I am not honoring my body as a temple for God by consenting to such procedures or participating in an act to my body that could cause harm.

### **Face Coverings**

*(Cor 3:18) And we all, who with unveiled faces contemplate the Lord's glory, are being transformed into his image with ever increasing glory, which comes from the Lord, who is the Spirit.*

*(Gen 2:7) God breathed into his nostrils the breath of life and man became a living soul*

*(Rev 11:11) The breathe of life from God entered them*

*(1 Corinthians 11:7) For a man ought not to have his head covered, since he is the image and glory of God; but the woman is the glory of man.*

*(Matthew 5:48) Therefore you are to be perfect, as your heavenly Father is perfect.*

*(Genesis 1:26-27) Then God said, "Let Us make man in Our image, according to Our likeness.."*

It is my belief that we are made in the image of God and are not to veil our faces. God gave us life, breathing air into our nostrils. We are made in his image and are not to cover or hide our



faces, as it would show shame to our Creator. There are other religions that preach the opposite, covering their heads and faces, and I am not to be mistaken for or engage in the practice of another religion. My religious beliefs prevent the hiding and veiling of my face with a face covering/mask/shield.

**Conclusion**

*Exodus 23:25 Worship the LORD your God, and his blessing will be on your food and water. I will take away sickness from among you..."*

*Exodus 15:26 He said, "If you listen carefully to the LORD your God and do what is right in his eyes, if you pay attention to his commands and keep all his decrees, I will not bring on you any of the diseases I brought on the Egyptians, for I am the LORD, who heals you"*

*Deuteronomy 31:6 Be strong and courageous. Do not be afraid or terrified because of them, for the LORD your God goes with you; He will never leave you nor forsake you."*

*Psalms 46:1 God is our refuge and strength, an ever-present help in trouble.*

It is my sincere belief that my devotion to God, the Bible and it's teachings, will provide myself and my family with the protection and healing it needs. I respectfully request acknowledgement of my religious beliefs and exemption of all vaccine requirements/requests, exemption to testing, and exemption from wearing face coverings.

Barbara B. Andreas

Barbara B. Andreas

8/20/21

Date

Jade Zalewski  
Notary Signature

8/20/2021

Date



# EXHIBIT H

---

**From:** Andreas, Barbara <Barbara.B.Andreas@disney.com>  
**Sent:** Friday, August 20, 2021 6:16 PM  
**To:** TWDC GHRO Leaves Team  
**Cc:** Day, Kelly M  
**Subject:** Barbara Andreas- Religious Exemption Request  
**Attachments:** Barbara.Andreas.ReligiousAffirmation.pdf;  
Barbara.Andreas.VaccineAccomodationRequest.pdf

To The Walt Disney Company HR,

I am writing to request a religious exemption from covering my face with a mask or shield, and to abstain from Covid testing and all Covid vaccines. Though I am not required to explain my religious beliefs, I have attached a document with further details to clarify why this goes against my sincere and deeply held religious beliefs. I have also completed and attached the form you have provided for employees seeking exemptions.

My religious rights and my right to privacy are protected by the U.S. Constitution and the Constitution of the State of Florida.

Religious creed includes my dress and my grooming practices, including what I put on my head or face. Wearing a face covering is an affront of my Christian beliefs.

Further, participating in a medical experiment, such as covid testing or vaccines, is also a violation of my religious beliefs. Covid test and vaccines have an emergency authorization by the FDA, not an approval. Therefore, these are experimental treatments, and I have the right to refuse consent – without being discriminated against, such as being required to stay home or be excluded from other activities.

According to the FDA, <https://www.fda.gov/vaccines-blood-biologics/vaccines/emergency-use-authorization-vaccines-explained>:

“FDA must ensure that recipients of the vaccine under an EUA are informed, to the extent practicable given the applicable circumstances, that FDA has authorized the emergency use of the vaccine, of the known and potential benefits and risks, the extent to which such benefits and risks are unknown, that they **have the option to accept or refuse the vaccine**, and of any available alternatives to the product.”

The burden of proof to refuse to accommodate my sincerely held religious beliefs is set to a very strict standard. According to law, stereotypes and generalizations are not valid evidence, such as the assumption that I would pose a safety threat to others by not wearing a mask or receiving an experimental vaccine.

No emergency, pandemic, health orders, executive orders, employment or business policies, rules, recommendations, regulations, guidelines, directives, or measures suspend Constitutional rights. No statute of law has been passed by the U.S. Congress that gives an exemption to this facility to allow for my rights to be violated. No president’s orders supersede the Constitution.

I have spoken in depth about this situation with my leader, Kelly Day, and have copied her on here as well for transparency.

I look forward to a response and the acknowledgment of my beliefs. Thank you for your time.

Sincerely,

Barbara B. Andreas



[ESPNWWOS.com](http://ESPNWWOS.com)

**Barbara B. Andreas**

**Guest Experience Manager**

Cell: (407) 443-7856

[Barbara.B.Andreas@disney.com](mailto:Barbara.B.Andreas@disney.com)

**RDO's Monday-Thursday**

# EXHIBIT I

10/13/2021

I'm writing to formally make known a personal concern regarding the process of accommodations for religious exemptions from the Covid 19 vaccines.

To inform those reading, I am a 20 year cast member, 15 years adjusted, with nearly that entire 15 years being spent in leadership. Throughout my career with Disney, I've been chosen specifically for special assignments (2010 recruiting trip to Germany, Norway and Italy), special teams (2015 Avengers/MyMagic+), special projects (2017-2019 Ticketing Replacement Project/SnApp), opening teams (2015-2016 Shanghai Opening Team/Guest Relations), as well as been a part of the forefront of numerous rollouts such as MDX, Fastpass+, CastApp, turnstiles to touchpoints, etc during the 5 years I spent in MK Guest Relations and Park Entry, 2010-2015. I've received numerous "bonus" merit increases, have consistently achieved "moving ahead" year-end reviews, impeccable attendance, and am confident that all my former direct leadership and peers, would speak incredibly highly on my behalf toward work ethic, teamwork, partnership and overall performance. Not once in my entire career have I been involved in a HR issue or felt the need to make a case, until now.

As soon as the mandate was announced, I sat with my leader, Kelly Day, at the first opportunity to discuss in depth how I felt about it and my plans to submit a religious exemption. I was met with her full and unconditional support, which was greatly appreciated. I submitted a 3 page, very detailed document in regards to my sincerely and deeply held beliefs against vaccines, testing and mask wearing on 8/20/21 at 6:16pm. On 8/24/21 at 10:55am, I emailed again to include a letter signed by my pastor that was left off the first email. I received a response back from Porcia Wade from Employee Relations to connect and discuss my request. On 8/30/21 at 4pm, this phone call took place.

Since then, I've heard nothing. We are going on a month and a half, 44 days to be exact, and I'm still awaiting a response. I did my due diligence of submitting what was requested, going above what is actually required to acknowledge religious beliefs, and abided by the deadline set forth by the company as 9/30/21. I received an email on 9/29/21 stated that I would still be considered compliant if the decision process went past the deadline.

This is a small part of my complaint. I understand these are unprecedented times, and most likely the HR department is overwhelmed with this process. However, for a company that prides itself on diversity, inclusion, and respect, it feels like those are forgotten for those of us exercising our constitutional right to religious freedom, religious practice and privacy.

In the meantime of awaiting a response, I was continually bombarded via email to complete my attestation. Since I was in the process of a religious accommodation, there was no need for myself to do the attestation. At no point did my leader Kelly ask me personally to complete this or follow up in regards to it. However, I received a zoom meeting request from my GM Mark Dukes for 9/17/21 at 3pm, who told me that my name had shown up on a list for ESPN, as having not done the attestation. This felt like I was being singled out, intimidated, and fear mongered for the fact that even though I'm following the process set forth by the company, I'm being made to look like a delinquent leader failing to complete my duties. I immediately called my leader afterward, who was unaware that this call was even taking place, and expressed my concern with this happening. Kelly has been approachable, supportive, and copied on everything I've submitted throughout this process. So the fact that she didn't know about this call, or that I showed up on the "list", seemingly justifies my feelings of intimidation. While Mark was respectful and professional towards me during the call, it felt very uncomfortable to have this conversation come from my GM and not my direct leader. Especially considering my direct leader Kelly was fully aware of my situation.

Porcia can attest that during our call, towards the end, I specifically said that I was uncomfortable in my workplace with covering my face. I was very detailed in my written beliefs I submitted, how covering/veiling my face goes against my deeply held religious beliefs. I explained that my situation was unique, being that I had just returned from a 14 month long furlough in mid-June, and shortly after returning, mask requirements had been

lifted so it was never a concern for me. But not much longer after, the company reversed that decision and brought back masking for indoor locations right before the vaccine mandate was announced. I should have written for a religious accommodation to mask wearing immediately upon my return, however since there was no proof of vaccination being required, I didn't feel comfortable singling myself out due to my religious beliefs. With a 20 year career, and not one blemish, I worried about retaliation and did not want to be the one making waves after returning from an incredibly long furlough, to which I was grateful to not have been let go from the company. Further, I asked Portia specifically if she could possibly expedite the mask exemption, even if the vaccine accommodation took longer. Portia said she would make a note of it for me. Since that call, no one has reached out to me. And I continue to feel uncomfortable, unfaithful, and an affront to my religious beliefs by continuing to cover my face at work. I spend as much time as I can outdoors, including meetings and 1:1's to avoid this sinful (in my belief) practice. Again, a company that prides itself on diversity, inclusion and respect, should be able to timely respond to an inquiry regarding one's religious beliefs. Would it be acceptable to make a Muslim woman wait over 44 days for a request to wear a head covering? Or a Jewish woman wait 44 days for a request to wear a skirt instead of pants as part of her costume? This feels discriminatory and biased.

Lastly, while my personal phone call with Portia wasn't overly intrusive in nature, this is not what I'm hearing from other cast members. Quite frankly, I'm appalled by the questions they are saying are being asked of them. They are prying, intrusive, and have little to do with that cast members deeply held beliefs. It feels like intimidation to get them to say something that can be used against them or grounds for denial- even though no one from HR when asked can explain what grounds would be used for denial and whether an appeal would be granted. In comparison, I have friends in professional roles with major companies in the state of Florida, who have submitted their religious accommodation forms and were approved the next day! But here I am, day 44, still waiting for acknowledgment. You set forth the deadline of 9/30, yet you are not abiding by it.

In the meantime, this has and continues to cause undue stress to myself and my family. I am part time now, working weekends mostly, and home with my two young children during the week. It's extremely overwhelming to not know every time I refresh my work emails on my phone whether a response will come through telling me I'm no longer a part of a company I've given TWENTY years of my life to. To constantly be asked by family members and friends if I've heard any news yet. To watch friends in comparable situations receive their accommodations from their companies in a timely manner. To plan for events, staffing, meetings, not knowing if I'll still have a job and able to attend them. To feel in limbo for nearly two months now, three if you include the time from the announcement coming out (conveniently on a Friday at 5pm!). To watch friends, peers, leaders, valued cast, already leave the company over this mandate. And to have to keep all this inside, and put on a happy face to come to work and "make magic" for everyone else, while inside it's weighing down heavily. This is by no means a poor reflection on my direct leader Kelly. She has been supportive of me throughout this process and is always available to talk when needed. But it's also alarming the lack of information she and leaders her level and above are provided. To my knowledge, I'm the only leader at ESPN that is seeking an accommodation. I could be wrong, as I don't make a habit of, or normalize asking someone their personal medical decisions. But from conversations in passing, or openly shared information on their end, I'm quite certain this is true. So on top of stress from the overall situation, there's also the underlying concern for what's yet to come, in regards to personal respect, privacy and retaliation. I do want to be clear that I do not currently feel anything but support from my direct peers. I'm appreciative of such an amazing team whom I work closely with. But team dynamics and work locations can change periodically and I can't say I don't fear what would happen when/if that does occur.

I kindly ask you to please consider expediting my request and providing acknowledgment of my deeply held, sincere, religious beliefs against vaccinations, testing and mask wearing with the information I submitted back on 8/20/21. And further acknowledge my accommodation to remove myself from the faithless act of veiling my face immediately.

Sincerely,

Barbara B Andreas

# EXHIBIT J



---

**From:** Andreas, Barbara <Barbara.B.Andreas@disney.com>  
**Sent:** Wednesday, December 29, 2021 3:02 PM  
**To:** WADE, PORCIA  
**Subject:** Re: Accommodation Request for Barbara Andreas

Good afternoon Porcia,

Can the company kindly provide how they came to this conclusion? Specifically how my deeply held sincere religious beliefs are being dismissed after extensive written explanations and multiple phone conversations to affirm them.

Thank you,

~Barbara

On Dec 29, 2021, at 12:24 PM, DPEP Restrictions & Accommodation Team <DPEP.Restrictions.Accommodation.Team@disney.com> wrote:

Hello Barbara,

Thank you for taking the time to speak with Employee Relations about your request for a religious exemption from the Company's face cover requirements.

After careful review of the information you provided, we are unable to conclude that you are prevented from wearing a face cover due to a sincerely held religious belief, practice or observance. In addition, based on the essential job functions of your role, we are not able to allow an exemption from the face cover requirements, which have been implemented as a health and safety protocol to promote a safe environment for cast members and guests. As a result, we must deny your request, and if you are unable to follow this health and safety protocol, your employment will be subject to separation.

If you have any questions, please don't hesitate to reach out to the DPEP Accommodations Team at [DPEP.Restrictions.Accommodation.Team@disney.com](mailto:DPEP.Restrictions.Accommodation.Team@disney.com)

DPEP Accommodations Team

# EXHIBIT K



1101 E. CUMBERLAND AVE.  
SUITE 201H-133  
TAMPA, FLORIDA 33602  
(813) 279-8491  
INFO@SMARTLAWFL.COM

February 14, 2022

The Walt Disney Company  
ATTN: Restrictions & Accommodation Team  
1375 E Buena Vista Dr.  
(321) 939-7013  
DPEP.Restrictions.Accommodation.Team@disney.com

RE: Barbara Andreas/Religious objection to COVID-19 employee policies

I have the pleasure of representing Ms. Barbara Andreas, Guest Experience Manager for the Walt Disney Company (hereinafter, "Disney" or "You"), concerning the above-referenced matter. As You know, on or about August 20, 2021, Ms. Andreas notified Disney of an irreconcilable personal conflict with certain employment policies. Specifically, Disney's requirement that employees submit to so-called "vaccination" for the COVID-19 Virus and/or wear face coverings while on duty ("collectively referred to hereinafter as, the "COVID-19 Policies") compels Ms. Andreas to surrender sincerely held religious beliefs and forego attendant practices, as a condition of continued employment. Accordingly, Ms. Andreas requested reasonable accommodation from Disney to alleviate this conflict.

On or about December 29, 2021, after a weeks-long inquiry, Disney's Restrictions and Accommodations Team advised Ms. Andreas that her request for accommodation was denied because, "...we are unable to conclude that you are prevented from wearing a face cover due to a sincerely held religious belief, practice or observance." Respectfully, this response is completely unacceptable and demonstrative of Disney's overall mishandling of this matter, in clear violation of Ms. Andreas's rights under applicable Florida and Federal law.

Under Florida law, Section 381.00317(1), Florida Statutes, provides that, "a private employer may not impose a COVID-19 vaccination mandate...without providing individual exemptions that allow an employee to opt out of such requirement" for five separate reasons, including "religious reasons." Section (2) states that if an employee has submitted an exemption statement under one of the exemptions, "the employer must allow the employee to opt out of the employer's COVID-19 vaccination mandate." Section (4) prohibits an employer from discharging an employee based on a vaccination mandate and termination includes the functional equivalent of a termination. Under rule 2ER21-1(1)(e), the phrase "[f]unctional equivalent of termination" means an employee has "resigned under duress" or the employer "made working conditions so difficult or intolerable that a reasonable person in the employee's position would feel compelled to resign."

Under Federal Law, Title VII of the Civil Rights Act of 1964 prohibits an employer from taking an adverse employment action against any individual...because of such individual's...religion." 42 U.S.C. §2000e- 2(a). The term "religion" is defined as including, "...all aspects of religious **observance and practice, as well as belief.**" §2000e(j). Accordingly, "...**an employer may not take an adverse employment action against an applicant or employee because of any aspect of that individual's religious observance or practice** unless the employer demonstrates that it is unable to reasonably accommodate that observance or practice without undue hardship." *Equal Employment Opportunity Commission v. Abercrombie & Fitch Stores, Inc.*, 575 U.S. 768 (2015). Discrimination claims under Title VII are divided into two categories: **disparate treatment** (i.e., acts of intentional

discrimination), and **disparate impact** (i.e., acts that indirectly affect members of a protected class). Here, Disney's enforcement of the COVID-19 Policies without regard for its obligation to accommodate the conflicting religious beliefs and practices of its employees is actionable under Title VII as a claim of **disparate treatment discrimination**.

In a recent case which presented analogous facts and issues, the U.S. Supreme Court found an employer liable for disparate treatment discrimination under Title VII in declining to hire a Muslim applicant because her **religious practice** of wearing a hijab did not fit within the employer's dress policy. *Abercrombie*, at 768. In so doing, the Court held that the law is designed to ensure that "**an employer may not make an applicant's religious practice, confirmed or otherwise, a factor in employment decisions.**" *Id.* The Court further observed that "Title VII does not demand mere neutrality with regard to religious practices; rather, it **mandates favored treatment, affirmatively obligating employers not 'to fail or refuse to hire or discharge any individual . . . because of such individual's 'religious observance and practice.'**" *Id.* At 775; § 2000e(j); *TWA v. Hardison*, 432 U.S. 63, 66 (1977). "An employer is surely entitled to have, for example, a no-headwear policy as an ordinary matter. But when an applicant requires an accommodation as an "aspec[t] of religious ... practice," it is no response that the subsequent adverse action was due to an otherwise-neutral policy. Simply put, "**Title VII requires otherwise-neutral policies to give way to the need for an accommodation.**" *Id.* at 775.

Similarly, here, Ms. Andreas's refusal to participate in an experimental "vaccination" scheme and objection to wearing face a covering are "acts" in accordance with her sincerely held religious beliefs. This is substantively no different than the Muslim applicant's "act" of wearing a hijab, in *Abercrombie*. Accordingly, Disney's enforcement of the COVID-19 Policies here, without affording reasonable accommodation, is prima facie indicia of intentional discrimination under both Title VII. To be clear, this is not a case of disparate *impact* discrimination under Title VII; therefore, Ms. Andreas is under no obligation to engage in a McCarthy-style interrogation or debate about the merits of her beliefs, or to otherwise "prove" the sincerity of same to Disney. And it is unbelievably inappropriate for a Disney agent to unilaterally declare that Ms. Andreas's beliefs are "not sufficiently sincere" to warrant protection or accommodation.

Under Title VII, the burden falls on Disney to justify its discriminatory treatment of Ms. Andreas by demonstrating a compelling purpose for the COVID-19 Policies and undue hardship that would result from affording reasonable accommodation. Disney will doubtless cite an intent to protect the general safety and wellbeing of employees and guests; however, there simply are no clear, irrefutable facts or data to support such general platitudes or to otherwise justify the degree of overreach associated with the COVID-19 Policies. While no reasonable person disputes that common-sense preventative measures, such as routine handwashing and sanitization, are necessary and appropriate efforts to combat the spread of *any* virus, the data now shows that the COVID-19 pandemic is largely an artificial "emergency" that has been imposed and perpetuated by widespread coordinated psychological manipulation of the public through incessant, prolonged, fear-based reporting of inflated death and case counts, culminating in a campaign to coerce the American people to accept the so-called COVID-19 "vaccines," which are untested and unproven biological agents.

In reality, the COVID-19 data presents a very different picture than that painted, collectively, by the media, the pharmaceutical industry, the government, and organizations, like Disney, who prioritize meaningless optics over the wellbeing of its employees. The appearance of a high degree of COVID-19 transmission was created by widespread use of a PCR test, which even its Nobel Prize winning inventor concedes, cannot be used to accurately diagnose the COVID-19 virus. Additionally, the U.S. Department of Health and Human Services "COVID-19 Community Profile Report 20" reveals the following data on the effects of COVID-19 infection, in the United States:

- ER visits: 1.2% due to COVID (26 states <1%, highest is 3.1%)
- Inpatients: 4% due to COVID (considered low)

- ICU patients: 9% due to COVID (considered moderate)
- Total hospitalizations: 46 states  $\leq 15$  per 100,000 and 49 states  $\leq 20$
- Cases: 9 per 100,000 per day
- 95% of "COVID-19 deaths" involve an average of 4 comorbidities
- Overall, COVID-19's fatality rate is 0.2% globally, and drops to 0.03% for persons under age 70, which doubtless represents the vast majority of Disney's employee and guest demographic.
- COVID-19's fatality rate is on par with the seasonal flu virus, and substantially lower than that of Tuberculosis (10%), the original SARS (9%), and the MERS virus (30%), all with a comparable rate of spread.

Arguably, to justify enforcement of the COVID-19 Policies (over religious objections) for the ostensible purpose of protecting employees and guests from a virus with an almost statistically non-existent risk of death, and a negligible risk of hospitalization, Disney would need to show that it has taken similarly drastic measures to thwart the spread of other pathogens which present similar, or greater, risks.

Even if Disney *could* demonstrate an essential underlying purpose for the COVID-19 Policies, it would then have to show that the specific measures prescribed thereunder are truly effective mitigation tools, to the exclusion of less-objectionable alternatives. This will be a near impossible undertaking, given the lack of any peer-reviewed data as to the long-term efficacy of any "vaccines" that have been in widespread use for little over a year, to date. Even more problematic, healthcare professionals and reputed Professors of Science and Medicine around the globe have reported catastrophic side effects associated with these hastily produced substances. In fact, many have appealed to the FDA to halt the vaccines, including Canadian Physicians, Israeli People's Committee, Frontline COVID-19 Critical Care Alliance, World Doctors Alliance, Doctors 4 Covid Ethics, and America's Frontline Doctors.

Moreover, both the Pfizer and Moderna EUA COVID-19 experimental injections were only shown to reduce symptoms—not block transmission. In fact, Pfizer employees were recently captured on hidden video admitting that natural immunity obtained through prior infections is more effective than any "vaccine." Indeed, numerous alternative safe and effective treatments for COVID-19 are widely available. Globally and in the United States, treatments such as Ivermectin, Budesonide, and Dexamethasone, convalescent plasma and monoclonal antibodies, Vitamin D, Zinc, and Azithromycin are being used to great effect. While Dr. Anthony Fauci's NIH, which happens to have a financial stake in Moderna's COVID-19 vaccine, and others may downplay these treatments, the fact is that they have been used to great effect and have even resulted in a Nobel Prize nomination. While many of these treatments have been publicly maligned, they are all working in various capacities around the world and are all safer than the "vaccines."

While it is clear that no case can be made to justify mandatory employee "vaccination," it is no "reasonable accommodation" to single out unvaccinated employees for enforcement of mask requirements and other absurd protocols. Indeed, over 400 studies have concluded that restrictive measures, including mask mandates, social distancing and lockdowns have been ineffective at stopping transmission of the virus, and masks themselves have proven harmful to the wearer. Even Dr. Anthony Fauci, director of the National Institute of Allergy and Infectious Diseases (NIAID) at the National Institutes of Health (NIH), stated in a 60 Minutes interview on March 8, 2020 that, "...there's no reason to be walking around with a mask...[a]nd often, there are unintended consequences." In a recent study, German researchers found that a mask that covers your nose and mouth poses significant adverse effects and pathophysiological changes, including the following, which often occur in combination: decrease in blood oxygen saturation; increase in heart rate; decrease in cardiopulmonary capacity; feeling of exhaustion; increase in respiratory rate; difficulty breathing and shortness of breath; headache; dizziness; drowsiness; decrease in empathy perception; impaired skin barrier function with acne; itching and skin lesions; and microbiological contamination.

Given the undeniable physical and psychological consequences of prolonged mask wearing—not to

mention the abject cruelty of requiring employees to cover their nose and mouth while engaged in laborious tasks, often under extreme environmental conditions—as well as the absence of any scientifically proven benefit of masks in preventing virus infection and/or transmission generally, Disney’s mask requirement is clearly arbitrary and capricious, lacking a plausible nexus to any essential purpose. More significantly, considering the data showing that vaccinated individuals are equally susceptible to Covid-19 infection and transmission, it is readily apparent that the Covid-19 Policies are intended solely to penalize unvaccinated employees and/or discourage a specific religious practice.

In the absence of an objectively compelling purpose for discriminatory employment practices and/or undue hardship that would necessarily result from affording reasonable accommodation to same, an employer must demonstrate a legitimate, non-discriminatory reason for any adverse action taken against an employee. Here, Ms. Andreas has demonstrated a stellar history of employment with Disney dating back to June 2001. Not only has Ms. Andreas never received a formal reprimand or negative feedback relating to job performance, she has earned special recognition for exceptional performance, including merit-based bonuses and salary increases, invitation to participate on special projects, including serving on the opening team for Shanghai Disneyland, and consistently positive feedback on annual reviews. Accordingly, any future adverse action taken against Ms. Andreas by Disney would be presumptively suspect as an act of discrimination.

In light of the foregoing, please be advised that, effective immediately, Ms. Andreas will not comply with the COVID-19 Policies, to the extent that same conflicts with deeply held religious beliefs and practices. Specifically, Ms. Andreas will not submit to a COVID-19 “vaccine” under any circumstances, nor will she wear a mask, face covering, or any other form of so-called “personal protective equipment” during work shifts, unless and until Disney can articulate a compelling and essential purpose that cannot otherwise be satisfied without undue hardship. To that end, we do not accept the generic opinions of “experts” on Disney’s payroll, without equal consideration being given to the contrary opinions of unbiased experts and the abundance of conflicting data. Likewise, we reject blind deference to “guidelines” or “protocols” established by unelected government agencies with no lawmaking authority over Disney or its employees. To the extent that any adverse action is taken against Ms. Andreas for her religious beliefs and acts, we will pursue all remedies available under Florida and/or Federal law, in addition to making the public aware of Disney’s profound mistreatment of its employees, to the greatest degree possible and allowable under law.

In closing, kindly direct any future questions or concerns to my attention and refrain from independently engaging my client regarding this matter without my advance knowledge and consent.

Warm Regards,



Carroll G. Sanders, Esq.  
Carroll@Smartlawfl.com

Cc: Porcia.Wade@disney.com  
Faron.Kelley@disney.com  
Kelly.M.Day@disney.com  
Barbara.B.Andreas@disney.com

# EXHIBIT L

### COVID-19 Vaccination Exception Request Form

If you are requesting an exception to the Company’s mandatory vaccination policy due to your (1) disability or medical condition, or (2) sincerely held religious belief, practice or observance, please complete this form and submit it to TWDC.GHRO.Leaves.Team@disney.com.

1. If you are unable to receive a COVID-19 vaccination due to a disability or medical condition:

a. Please explain the nature of the limitations resulting from your disability or medical condition and how they prevent you from receiving a COVID-19 vaccination. (Please do not disclose the underlying condition or any genetic information.)

---

---

---

b. Is your limitation that prevents you from receiving the COVID-19 vaccination permanent or temporary? If temporary, when will you be able to receive the COVID-19 vaccination?

---

c. Please attach documentation from your medical provider confirming the existence of a disability or medical condition, the duration and resulting limitations, and providing information about how those limitations prevent you from receiving the COVID-19 vaccination. (Please do not disclose the underlying condition or any genetic information.)

The Company may ask to discuss your request with your doctor if the documentation provided is not sufficient to evaluate your accommodation request.

2. If you are unable to receive a COVID-19 vaccination due to a sincerely held religious belief, practice or observance, please explain the nature of your religious belief, practice or observance and how it prevents you from receiving a COVID-19 vaccination.

As a devout and practicing Christian, I have strong religious convictions against abortion. This belief stems from Psalm 139:13 “For you created my inmost being, you knit me together in my mother’s womb.” For me this verse demonstrates the sanctity of life even in very beginning stages. According to health.com, nebraskamed.com, and several mainstream medical sites the Johnson and Johnson vaccine, the Jansen vaccine as well we the Moderna and Pfizer vaccine have all used cells from a terminated fetus, either in testing or developmental stages of the vaccine, I cannot in good conscious and still aligning with my faith accept this vaccine into my person. To that end, for all the products that I knowingly use in my daily life—particularly products I put on my skin and in my body—I have conducted research to confirm that they do not violate my convictions. Certainly, in the context of the afore-mentioned COVID-19 vaccines, I do not believe that using cells from an aborted fetus for the benefit of the greater good or my personal benefit can be reconciled with my religious beliefs.

Further, 1 Corinthians 6:19-20 says: ‘your body is a temple of the holy spirit. You must honor God with your body.’ Accordingly, I am extremely cautious about putting anything into my body—I have never consumed tobacco or illicit drugs, and I have abstained from sexual intercourse for my entire life (awaiting marriage). Likewise, I cannot in following the application of this verse inject a manmade substance into my body that has not been tested effectively on animals, or undergone long term observation vis-a-vis human consumption.



If necessary to evaluate your accommodation request, the Company may ask to discuss the nature of your religious belief, practice or observance and accommodation request with your religion's spiritual leader (if applicable) or another third party who is aware of your religious belief, practice, or observance.

**Verification:**

I verify that the above information is true and accurate and I understand that any misrepresentation may result in disciplinary action, including termination of employment.

Name: Stephen Joseph Cribb

Date: 8/20/2021

Signature: 

Personnel Number (PERNR): 00625583

# EXHIBIT M

Code or (b) promoting, marketing or recommending to another party any transaction or matter addressed in this communication (or in any attachment).

---

**From:** Carroll Sanders

**Sent:** Tuesday, April 5, 2022 6:26 PM

**To:** Suzuki, Jennifer

**Subject:** RE: REQUEST: Phone Conversation with Employee Relations

Hi, Jennifer. Respectfully, I have advised you multiple times that I represent Mr. Cribb concerning this matter, and I have kindly requested that all communications regarding same be directed to me. Nonetheless, Ms. Wade continues to reach out to Mr. Cribb directly by phone and email. I would point out that under the comments to Florida Rule of Professional Conduct Rule 4-4.2 (i.e., the "no contact rule"), "[a] lawyer may not make a communication prohibited by this rule through the acts of another. See 8.4(a)." In other words, the rule does not cease to apply to Disney because a non-attorney is the one making the direct contact with a known represented party. To that end, my only communication to Ms. Wade—an email on which you were copied—asked that she kindly discontinue such inappropriate efforts. I do not believe this is the type of communication contemplated by Rule 4-4.2; however, I will certainly respect your request going forward, provided that Disney shows my client and I the same courtesy.

As for Disney's desire to engage Mr. Cribb privately, I cannot agree to that. Disney has not acted in good faith throughout this matter (and others), so we simply cannot trust a Disney agent to be fair to Mr. Cribb in an environment in which he does not have a witness present. Moreover, contrary to your factual assertions below, Mr. Cribb absolutely conveyed his concerns and objections to Disney's "safety protocols" (including mask requirements) to his direct supervisor, his general manager, the vice president of resort operations, and others on multiple occasions. Nevertheless, Disney showed no interest in having a meaningful conversation with Mr. Cribb at any point over the last eight months, and it certainly took no serious action to reconcile his objections. If Disney wants to continue its COVID-19 charade, it is free to do so. But recent USSC case law makes it perfectly clear that such a policy must yield whenever it creates conflict with an employee's faith, period. Instead, here, Disney chose to punish an otherwise model employee for doing nothing more than acting in accordance with his deeply held religious beliefs.

As I have offered before, I am happy to arrange a meeting with Mr. Cribb to discuss this matter further with you or a designated agent of Disney. Alternatively, I will be happy to speak on Mr.

Cribb's behalf as to the specifics of his position, subject to applicable privileges.

Best,

Carroll Sanders, Esq.  
1101 E Cumberland Ave.

Suite 201H-133  
Tampa, Florida 33602

(813) 279-8491



**NOTICE OF CONFIDENTIALITY:** This email, and any attachments thereto, is intended for use only by the addressee(s) named herein and may contain confidential information, legally privileged information and attorney-client work product. If you are not the intended recipient of this email, you are hereby notified that any dissemination, distribution or copying of this email, and any attachments thereto, is strictly prohibited. If you have received this email in error, please notify the sender by email, telephone or fax, and permanently delete the original and any of any email and printout thereof. Thank you.

**IRS CIRCULAR 230 NOTICE:** In compliance with IRS requirements, we inform you that any U.S. tax advice contained in this communication (or in any attachment) is not intended or written to be used, and cannot be used, for (a) the purpose of avoiding penalties under the Internal Revenue Code or (b) promoting, marketing or recommending to another party any transaction or matter addressed in this communication (or in any attachment).

---

**From:** Suzuki, Jennifer

**Sent:** Tuesday, April 5, 2022 3:56 PM

**To:** Carroll Sanders

**Subject:** RE: REQUEST: Phone Conversation with Employee Relations

Hi Carroll. Consistent with professional rules on lawyers' communications with represented parties (including organizations), I ask again that you direct your communications about this matter to me.

In August 2021, Mr. Cribb made an accommodation request related to the vaccine requirement that was in effect at the time. Subsequently, after the passage of Florida Statute § 381.00317, the company paused enforcement of the vaccine requirement and this was communicated to Mr. Cribb on November 19, 2021. At that time, Mr. Cribb was also informed that any accommodation requests related to the vaccine requirement would not be evaluated, given that vaccination was not a condition of employment.

We do not have a record of Mr. Cribb having made any accommodation request related to other safety protocols, including the face cover requirement. If Mr. Cribb has such an accommodation request, the process is for Employee Relations to have a conversation with him, one on one. Of course Mr. Cribb is entitled to consult with his attorney on this or any other matter, but any discussion with Employee Relations about a current employee's accommodation need is meant to be a direct dialogue, without attorney participation in the meeting. Without this direct dialogue, the company will not be able to review his request. I would ask that you encourage Mr. Cribb to contact Porcia so she has an opportunity to talk to him about his request, as well as any other concerns he may want to share.

Thank you,

Jennifer

---

**From:** Carroll Sanders <[carroll@smartlawfl.com](mailto:carroll@smartlawfl.com)>

**Sent:** Wednesday, March 30, 2022 8:24 AM

**To:** Stephen Cribb <[sjcribb86@gmail.com](mailto:sjcribb86@gmail.com)>; WADE, PORCIA <[PORCIA.WADE@disney.com](mailto:PORCIA.WADE@disney.com)>

**Cc:** Suzuki, Jennifer <[Jennifer.Suzuki@disney.com](mailto:Jennifer.Suzuki@disney.com)>

**Subject:** RE: REQUEST: Phone Conversation with Employee Relations

Hi, Porcia—me again. I have made it abundantly clear to you and to Ms. Suzuki that I am representing Mr. Cribb concerning Disney's discriminatory policies and the adverse employment action that it took against Mr. Cribb for asserting his lawfully protected religious beliefs/acts. I have initiated claims with the EEOC, the Florida Commission on Human Relations, and the Florida Attorney General on Mr. Cribb's behalf; therefore, he will not be speaking directly with you or anyone from Disney unless I am present. Frankly, until Disney is prepared to issue a formal

apology to Mr. Cribb for it's utterly intolerable actions, and reinstate his employment without qualification, and issue backpay for the entirety of his unjust suspension, and abandon its discriminatory employee policies going forward—as Disney has already done for all guests, regardless of vaccination status—there really is not much to discuss here.

Best,

Carroll Sanders, Esq.  
1101 E Cumberland Ave.

Suite 201H-133  
Tampa, Florida 33602

(813) 279-8491



**NOTICE OF CONFIDENTIALITY:** This email, and any attachments thereto, is intended for use only by the addressee(s) named herein and may contain confidential information, legally privileged information and attorney-client work product. If you are not the intended recipient of this email, you are hereby notified that any dissemination, distribution or copying of this email, and any attachments thereto, is strictly prohibited. If you have received this email in error, please notify the sender by email, telephone or fax, and permanently delete the original and any of any email and printout thereof. Thank you.

**IRS CIRCULAR 230 NOTICE:** In compliance with IRS requirements, we inform you that any U.S. tax advice contained in this communication (or in any attachment) is not intended or written to be used, and cannot be used, for (a) the purpose of avoiding penalties under the Internal Revenue Code or (b) promoting, marketing or recommending to another party any transaction or matter addressed in this communication (or in any attachment).

---

**From:** Stephen Cribb <[sjcribb86@gmail.com](mailto:sjcribb86@gmail.com)>

**Sent:** Wednesday, March 30, 2022 11:04:19 AM

**To:** Carroll Sanders <[carroll@smartlawfl.com](mailto:carroll@smartlawfl.com)>

**Subject:** Fwd: REQUEST: Phone Conversation with Employee Relations

----- Forwarded message -----

From: **WADE, PORCIA** <[PORCIA.WADE@disney.com](mailto:PORCIA.WADE@disney.com)>

Date: Wed, Mar 30, 2022 at 11:00 AM

Subject: REQUEST: Phone Conversation with Employee Relations

To: [sjcribb86@gmail.com](mailto:sjcribb86@gmail.com) <[sjcribb86@gmail.com](mailto:sjcribb86@gmail.com)>

Hi Stephen,

As you know, you were suspended on March 16, 2022 for refusing to wear a face covering, as required by applicable health and safety protocols. On March 18, I called you and let you know I would like to have a conversation with you to understand more about what happened. You said you did not want to speak with me without your lawyer (who was there with you when I called), or without recording our conversation. I said I would reconnect with you at a later time.

Since our call on the 18<sup>th</sup>, I have learned you may have an accommodation need concerning the safety protocols. I tried reaching you and left voicemails for you this past Monday and Tuesday. Please call me at your earliest convenience so I can learn more about your request and about the events leading to your suspension. For clarity, the conversation will be one on one between you and me, and recording will not be permitted.

Stephen, I know you have concerns on your mind, and I would really like to talk to you directly to understand them better.

Thank you.

**Porcia Wade** | Employee Relations | Disney Parks, Experiences, and Products

**Office:** 407.828.4557 (8-222) | **Cell:** 407.701.8339 | **Days off:** Sat. & Sun.

# EXHIBIT N



\*Are you requesting a medical or religious accommodation?

Religious

\*If you are unable to receive a COVID-19 vaccination due to a sincerely held religious belief, practice or observance, please explain the nature of your religious belief, practice or observance and how it prevents you from receiving a COVID-19 vaccination.

Unfortunately, there is a slue of reasons not to take this experimental vaccine. (https://www.fda.gov/media/150386/download ,page 13 paragraph Y). The safety of the use of an MRNA vaccine that has never been used on humans and stopped on animals after they kept dying looks like a myriad of reasons not to support an experimental medical procedure. These vaccines have had the highest death toll and adverse reactions than any other vaccine released to the public to date. As those numbers are suppressed by censorship and not reporting to VERS. It is believed long ago that we are nearing heard immunity (https://pubmed.ncbi.nlm.nih.gov/33933145/).

As a Christian, it is hard to ignore the truth of the plandemic. Me writing this very letter out to me is more that proof that dying of Covid19 is not a life changing event. Thank God. If it was not for Media, Big Tech censorship, and corporate companies like you. We not know Covid19 even exist. I know of no one who has died. However, some have been sick. Not uncommon for any year. Those who do not seek truth will never see it.

I believe, trusting in "science" has never gotten me anywhere and will get many people sick or killed with an experimental potion.

I believe, "And ye shall know the truth, and the truth shall make you free,"(John, 8:32).

I believe, the truth is through God the Father and his Son Jesus "I am the way and the truth and the life. No one comes to the Father except through me. (John 14,6)

I believe, and have faith that, Jesus said to her, "I am the resurrection and the life. Whoever believes in Me will live, even though he dies, (John, 11:25).

I also believe, "Do you not know that you are God's temple and that God's Spirit dwells in you? If anyone destroys God's temple, God will destroy him. For God's temple is holy, and you are that temple,"(1 corinthians 3:16-17). We are that temple and should not knowing truth do harm to our self. Just as stated in, ecclesiastes 7:17, "Be not overly wicked, neither be a fool. Why should you die before your time?"

Suicide is an abomination to our body, to the spirit of man, and only Lucifer the devil himself would profit from the mass killing, sterilization, crippling effects of an experimental vaccine. Our bodies were not made by God to put a known poison into it.

No one truly knows what awaits us but as my beliefs stand with truth, not science, will save us from a plandemic created by man. God with his Son Jesus will save us.

If necessary to evaluate your accommodation request, the Company may ask to discuss the nature of your religious belief, practice or observance and accommodation request with your religion's spiritual leader (if applicable) or another third party who is aware of your religious belief, practice, or observance.

\*  I verify that the above information is true and accurate and I understand that any misrepresentation may result in disciplinary action, including termination of employment.

Attach Document

My Requests

Search Requests

Filter

- Completed (7)
- Submitted (1)

Sort

- Last Updated
- Opened On
- Number

My Requests

8 requests found

HRC52918601  
Completed  
DFHC Coupon Request

Opened on 2021-10-20 17:22:09  
Updated on 2021-10-20 17:22:09

HRC52900508  
Submitted  
Vaccination Accommodation Request: Adam Pajer

Opened on 2021-10-15 00:54:41  
Updated on 2021-10-15 00:54:47

HRC52629537  
Completed  
HR-Mandatory Vaccine

Opened on 2021-08-02 13:17:43  
Updated on 2021-08-02 15:07:03

HRC52253845  
Completed  
Ticketing Inquiry

Opened on 2021-01-26 17:33:41  
Updated on 2021-01-26 17:51:07

# EXHIBIT O



DATE

### **Request for Religious Exemption**

To Whom It May Concern:

Steven is affiliated with our church, Faith Assembly of God of Orlando, which has been in existence since 1975. Our position concerning vaccinations, as directed by the senior pastor, is for every individual to make it a matter of personal prayer; each individual is to decide whether to get the vaccine or not as they believe God speaks to them.

Our federal laws allow for personal religious beliefs. Steven is exercising their rights under the Title VII of the Federal Civil Rights Law of 1964, section 12, to receive religious exemption to immunizations due to their genuine and sincere religious beliefs.

We request that you honor this religious exemption for Steven Gibbons.

Sincerely,

A handwritten signature in black ink that reads "Pastor Carl Stephens". The signature is written in a cursive, flowing style.

Pastor Carl Stephens  
Senior Pastor

**Curry Ford Campus**  
9307 Curry Ford Road  
Orlando, FL 32825

**Michigan Street Campus**  
2740 E. Michigan Street  
Orlando, FL 32806

## Fw: Updated response including case numbers and email

---

From: Steve Gibbons (rav1112g@yahoo.com)  
To: dpep.restrictions.accomodation.team@disney.com  
Date: Monday, December 20, 2021 at 11:04 AM EST

---

----- Forwarded Message -----

**From:** Steve Gibbons <rav1112g@yahoo.com>  
**To:** dpep.restrictions.accomodation.team@disney.com <dpep.restrictions.accomodation.team@disney.com>  
**Sent:** Sunday, December 19, 2021, 11:37:10 AM EST  
**Subject:** Fw: Updated response including case numbers and email

----- Forwarded Message -----

**From:** Steve Gibbons <rav1112g@yahoo.com>  
**To:** Collazo346@gmail.com <Collazo346@gmail.com>  
**Sent:** Friday, December 17, 2021, 05:20:36 PM EST  
**Subject:** Fw: Updated response including case numbers and email

Sent from Yahoo Mail on Android

----- Forwarded Message -----

**From:** "Steve Gibbons" <rav1112g@yahoo.com>  
**To:** "Steve Gibbons" <steven.gibbons@disney.com>  
**Sent:** Fri, Dec 17, 2021 at 5:08 PM  
**Subject:** Fw: Updated response including case numbers and email

Sent from Yahoo Mail on Android

----- Forwarded Message -----

**From:** "Steve Gibbons" <rav1112g@yahoo.com>  
**To:** "#WDW Data Comm Foremen" <wdw.dl-data.comm.foremen@disney.com>, "DPEP.Restrictiuons.Accomodation.Team@disney.com" <DPEP.Restrictiuons.Accomodation.Team@disney.com>, "David B. Araujo Jr" <david.b.araujo.jr@disney.com>, "Kevin Ciullo" <kevin.ciullo@disney.com>, "Ryan B. Freeman" <ryan.b.freeman@disney.com>  
**Sent:** Fri, Dec 17, 2021 at 4:38 PM  
**Subject:** Updated response including case numbers and email  
All,

I was approached this week and pulled into a Manger's office. Then asked outright if I was vaccinated. When I responded "I'm not sure I'm am supposed to answer that question" I was then told that since I had not submitted documents to the verify website the company is now assuming I am no longer in compliance with the vaccine policy. Then I told I would be required to wear an n-95 mask and goggles to cover my eyes at all times on property. I was also informed by a foreman that we have also been instructed not to remove the mask to drink unless we go to a break room, and that we are not permitted to eat in the break room if another cast member is present. My union rep was called and arrived I

followed the union reps guidance at that time. I have since been in contact with hr and am including the hr case number, and the Email from global hr that I received back in October that states that I have an open case and I am considered in compliance of the policy while the case is open. I contacted global hr and spoke with Michelle who confirmed that yes I do have an open case (I provided the case number below), and am still considered in compliance with the policy and should be following the policy the same as any other in compliance cast member. She reassured me that no one should have ever told me the I would be suspended or fired. She also stated that there has been no change since the October email was sent to me. She also wanted me to share that if any of the managers had questions about this that they should contact hr and reference the case numbers below.

Today's case number 3065251

Open case number for exemption is 2910537

Sent from Yahoo Mail on Android

----- Forwarded Message -----

**From:** "TWDC Global HR Operations Services" <TWDC.GHRO.Services@twdc.com>

**To:** "RAV1112G@YAHOO.COM" <RAV1112G@YAHOO.COM>

**Sent:** Fri, Oct 29, 2021 at 2:34 PM

**Subject:** Your Vaccine Accommodation Request

Dear Employee,

Our records show that your accommodation request is currently in the review process, and we wanted to provide an update. We want to make sure to conduct a thorough review, and please be assured that while your request is being reviewed, you will not be considered to be out of compliance with the Company's vaccine requirement.

Employees with pending accommodation requests should continue working, following the applicable health and safety protocols for their location and position.

If Employee Relations has already contacted you regarding the completion of this review, please disregard this message. Otherwise Employee Relations will be in touch with you about your request.

Thanks,  
Disney Global Human Resources Operations

# EXHIBIT P

**COVID-19 Vaccination Exception Request Form**

If you are requesting an exception to the Company's mandatory vaccination policy due to your (1) disability or medical condition, or (2) sincerely held religious belief, practice or observance, please complete this form and submit it to TWDC.GHRO.Leaves.Team@disney.com.

1. If you are unable to receive a COVID-19 vaccination due to a disability or medical condition:
- a. Please explain the nature of the limitations resulting from your disability or medical condition and how they prevent you from receiving a COVID-19 vaccination. (Please do not disclose the underlying condition or any genetic information.)

Severe allergies (anaphalxis) and severe reactions to medications and recent vaccines. My side effects range from mild to severe, getting worse over the past several years. These include severe headaches, debillitating body aches, fevers, and anaphalxis (can't breathe)

- b. Is your limitation that prevents you from receiving the COVID-19 vaccination permanent or temporary? If temporary, when will you be able to receive the COVID-19 vaccination?

Permanent

- c. Please attach documentation from your medical provider confirming the existence of a disability or medical condition, the duration and resulting limitations, and providing information about how those limitations prevent you from receiving the COVID-19 vaccination. (Please do not disclose the underlying condition or any genetic information.)

The Company may ask to discuss your request with your doctor if the documentation provided is not sufficient to evaluate your accommodation request.

2. If you are unable to receive a COVID-19 vaccination due to a sincerely held religious belief, practice or observance, please explain the nature of your religious belief, practice or observance and how it prevents you from receiving a COVID-19 vaccination.

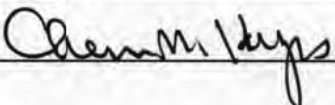
If necessary to evaluate your accommodation request, the Company may ask to discuss the nature of your religious belief, practice or observance and accommodation request with your religion's spiritual leader (if applicable) or another third party who is aware of your religious belief, practice, or observance.

**Verification:**

I verify that the above information is true and accurate and I understand that any misrepresentation may result in disciplinary action, including termination of employment.

Name: Cheron Hayes

Date: 8/10/21

Signature: 

Personnel Number (PERNR): 00350271

Letter by Mary H Quarterman, MD on 8/17/2021

---

**ORLANDO  
HEALTH®**

**Physician Associates**  
*Member of Orlando Health Medical Group*

ORLANDO HEALTH PHYSICIAN ASSOCIATES - FAMILY MEDICINE  
7243 DELLA DR STE K  
ORLANDO FL 32819-5106  
407-381-7366

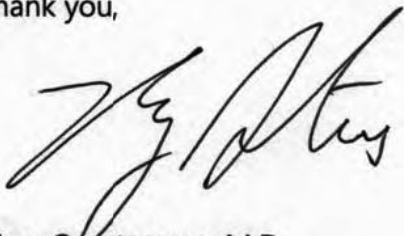
August 17, 2021

Cheron M Hayes  
9858 Namaste Loop  
Apt 3411  
Orlando FL 32836-5542

To Whom It May Concern:

Due to prior adverse reactions to shingles and flu vaccination, Cheron Hayes has decided the benefit of the COVID 19 vaccination does not outweigh the risk of her own possible adverse reaction. Please contact my office with any questions or concerns.

Thank you,



Mary Quarterman, M.D.

Orlando Health  
Physician Associates  
Mary Quarterman, MD  
7243 Della Drive, Suite K  
Orlando, FL 32819  
Tel 407.370.8705  
Fax 407.370.8732

---

**Chart Review Routing History**

No routing history on file.



# EXHIBIT Q

**COVID-19 Vaccination Accommodation Request Form**

If you are requesting an exception to the Company's mandatory vaccination policy due to your (1) disability or medical condition, or (2) sincerely held religious belief, practice or observance, please complete this form and submit it to \_\_\_\_\_.

1. If you are unable to receive a COVID-19 vaccination due to a disability or medical condition:
  - a. Please explain the nature of the limitations resulting from your disability or medical condition and how they prevent you from receiving a COVID-19 vaccination. (Please do not disclose the underlying condition or any genetic information.)

Severe allergies (anaphalaxis) and severe reactions to medication and recent vaccines. My side effects range from mild to severe, getting worse over the past several years. These include sever headaches, debilitating body aches fevers, and anaphalxis. Although both doctors i have seen will not "officially" exempt me from the vaccine, they both have said that i would need to be in the hospital to receive it, given my severe reactions.

- b. Is your limitation that prevents you from receiving the COVID-19 vaccination permanent or temporary? If temporary, when will you be able to receive the COVID-19 vaccination?

Permanent \_\_\_\_\_

- c. Please attach documentation from your medical provider confirming the existence of a disability or medical condition, the duration and resulting limitations, and providing information about how those limitations prevent you from receiving the COVID-19 vaccination. (Please do not disclose the underlying condition or any genetic information.)

The Company may ask to discuss your request with your doctor if the documentation provided is not sufficient to evaluate your accommodation request.

2. If you are unable to receive a COVID-19 vaccination due to a sincerely held religious belief, practice or observance, please explain the nature of your religious belief, practice or observance and how it prevents you from receiving a COVID-19 vaccination.

If necessary to evaluate your accommodation request, the Company may ask to discuss the nature of your religious belief, practice or observance and accommodation request with your religion's spiritual leader (if applicable) or another third party who is aware of your religious belief, practice, or observance.

**Verification:**

I verify that the above information is true and accurate and I understand that any misrepresentation may result in disciplinary action, including termination of employment and/or withdrawal of my offer of employment.

Name: Cheron Hayes

Date: 2/18/22

Signature: 

Personnel Number (PERNR): 00350271

Contact Phone: 407-982-0560

Work Location: \_\_\_\_\_



5900 Turkey Lake Road, Suite A, Orlando, FL 32819  
Ph: (407) 351-9696 | Fax: (407) 351-8848

Date: 09/21/2021

Re: CHERON HAYES  
DOB: 03/22/1967

Cheron Hayes is under my care at Harris Internal Medicine. Patient has a history of severe allergic reaction to the influenza and shingles vaccine. We have discussed that despite this, the COVID vaccine is still highly recommended. While I cannot exempt Ms. Hayes from the COVID vaccine, it would be reasonable to allow patient to work from home exclusively and/or get tested for COVID weekly. Please call 407-351-9696 for any questions.

Sincerely,

Harris Internal Medicine

*Current  
order  
@ 2/18/22*

Harris Internal Medicine  
Thomas D. Harris, M.D.  
5900 Turkey Lake Road, Ste. A  
Orlando, FL 32819  
(407) 351-9696

Letter by Mary H Quarterman, MD on 8/17/2021

---

**ORLANDO  
HEALTH<sup>®</sup>**

**Physician Associates**

*Member of Orlando Health Medical Group*

ORLANDO HEALTH PHYSICIAN ASSOCIATES - FAMILY MEDICINE  
7243 DELLA DR STE K  
ORLANDO FL 32819-5106  
407-381-7366

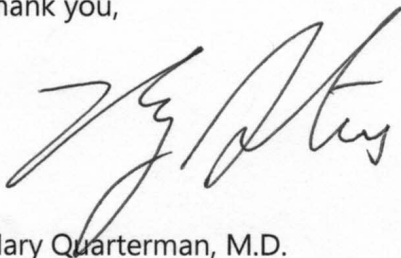
August 17, 2021

Cheron M Hayes  
9858 Namaste Loop  
Apt 3411  
Orlando FL 32836-5542

To Whom It May Concern:

Due to prior adverse reactions to shingles and flu vaccination, Cheron Hayes has decided the benefit of the COVID 19 vaccination does not outweigh the risk of her own possible adverse reaction. Please contact my office with any questions or concerns.

Thank you,



Mary Quarterman, M.D.

Orlando Health  
Physician Associates  
Mary Quarterman, MD  
7243 Della Drive, Suite K  
Orlando, FL 32819  
Tel 407.370.8705  
Fax 407.370.8732

---

**Chart Review Routing History**

No routing history on file.

**cheronhayes@yahoo.com**

---

**From:** cheronhayes@yahoo.com  
**Sent:** Monday, January 31, 2022 5:24 PM  
**To:** 'TWDC GHRO Services'  
**Cc:** 'TWDC GHRO Leaves Team'; 'DPEP.Restrictions.Accommodation.team@disney.com'; 'Giacalone, Margaret C'; 'CScott@ScottWagnerLaw.com'; 'Jihane.Elizee@disney.com'; 'jonathan.yaya@disney.com'  
**Subject:** RE: Legal Matter; Cheron Hayes (Rehire Status)

Global HR Team,

I have successfully interviewed for a position with the Retail Accounting Team (position # 905299BR, Senior Financial Accounting Analyst), and today was offered the position by the recruiter (Jonathan Yaya). He was walking me through the onboarding process, and he informed me of the vaccine mandate. I told him about our email communication, and that I had already requested the accommodation afforded by the Florida law.

He said he would be reaching out to you, but I wanted to send this email so that the process of me coming back to work would not be delayed.

Thanks so much in advance for your consideration in this matter.

Thanks!!

Cheron Hayes

---

**From:** TWDC GHRO Services <TWDC.GHRO.Services@disney.com>  
**Sent:** Friday, January 21, 2022 7:37 PM  
**To:** 'cheronhayes@yahoo.com' <cheronhayes@yahoo.com>  
**Cc:** TWDC GHRO Services <TWDC.GHRO.Services@disney.com>; TWDC GHRO Leaves Team <TWDC.GHRO.Leaves.Team@disney.com>; 'DPEP.Restrictions.Accommodation.team@disney.com' <DPEP.Restrictions.Accommodation.team@disney.com>; 'jihane.Elizee@disney.com' <jihane.Elizee@disney.com>; Giacalone, Margaret C <Margaret.C.Giacalone@disney.com>; 'CScott@ScottWagnerLaw.com' <CScott@ScottWagnerLaw.com>  
**Subject:** RE: Legal Matter; Cheron Hayes (Rehire Status)

Hello Cheron,

Thank you for reaching out. Someone will be in touch with you soon.

Thank you,



**From:** [cheronhayes@yahoo.com](mailto:cheronhayes@yahoo.com) <[cheronhayes@yahoo.com](mailto:cheronhayes@yahoo.com)>

**Sent:** Friday, January 14, 2022 11:53 AM

**To:** TWDC GHRO Leaves Team <[TWDC.GHRO.Leaves.Team@disney.com](mailto:TWDC.GHRO.Leaves.Team@disney.com)>; 'TWDC Global HR Operations Services' <[TWDC.GHRO.Services@twdc.com](mailto:TWDC.GHRO.Services@twdc.com)>; DPEP.Restrictions.Accommodation.team@disney.com; jinane.Elizee@disney.com; Giacalone, Margaret C <[Margaret.C.Giacalone@disney.com](mailto:Margaret.C.Giacalone@disney.com)>

**Cc:** [CScott@ScottWagnerLaw.com](mailto:CScott@ScottWagnerLaw.com)

**Subject:** Legal Matter; Cheron Hayes (Rehire Status)

**Importance:** High

Letter to Human Resources: Re Legal Matter

Team,

As you know I was separated from Disney due to my status as non-vaccinated. Since that time, I have applied for numerous remote and telework positions (both inside and outside of Disney) to no avail. My prior position at Disney was filled. I have been applying for several Disney positions (sometimes several a day), and I don't understand why I am not getting rehired. I was employed over 14 years and have no negative employment history. I am on a re-hire status but there seems to be a force working against me.

I have also learned that under Fla. Stat. Section 381.00317(3) I should be considered for an accommodation that includes wearing a mask and PPE. I would like to be considered for this accommodation. I have reached out to human resources and the recruiter for a position that I received a call on (Alissa Lloyd) and have not received a response.

I am not looking to make a claim, as I'd rather have my job and continue my employment with Disney. Can you please direct me to someone who can help?

Sincerely,

Cheron Hayes

[cheronhayes@yahoo.com](mailto:cheronhayes@yahoo.com)

(407) 982-0560

PERNR 350271

**COVID-19 Vaccination Exception Request Form**

*Previously Submitted last fall*

If you are requesting an exception to the Company's mandatory vaccination policy due to your (1) disability or medical condition, or (2) sincerely held religious belief, practice or observance, please complete this form and submit it to TWDC.GHRO.Leaves.Team@disney.com.

- 1. If you are unable to receive a COVID-19 vaccination due to a disability or medical condition:
  - a. Please explain the nature of the limitations resulting from your disability or medical condition and how they prevent you from receiving a COVID-19 vaccination. (Please do not disclose the underlying condition or any genetic information.)

Severe allergies (anaphalxis) and severe reactions to medications and recent vaccines. My side effects range from mild to severe, getting worse over the past several years. These include severe headaches, debillitating body aches, fevers, and anaphalxis (can't breathe)

---



---

- b. Is your limitation that prevents you from receiving the COVID-19 vaccination permanent or temporary? If temporary, when will you be able to receive the COVID-19 vaccination?

Permanent

---

- c. Please attach documentation from your medical provider confirming the existence of a disability or medical condition, the duration and resulting limitations, and providing information about how those limitations prevent you from receiving the COVID-19 vaccination. (Please do not disclose the underlying condition or any genetic information.)

The Company may ask to discuss your request with your doctor if the documentation provided is not sufficient to evaluate your accommodation request.

- 2. If you are unable to receive a COVID-19 vaccination due to a sincerely held religious belief, practice or observance, please explain the nature of your religious belief, practice or observance and how it prevents you from receiving a COVID-19 vaccination.

---



---



---

If necessary to evaluate your accommodation request, the Company may ask to discuss the nature of your religious belief, practice or observance and accommodation request with your religion's spiritual leader (if applicable) or another third party who is aware of your religious belief, practice, or observance.

**Verification:**

I verify that the above information is true and accurate and I understand that any misrepresentation may result in disciplinary action, including termination of employment.

Name: Cheron Hayes

Date: 8/10/21

Signature: *Cheron M. Hayes*

Personnel Number (PERNR): 00350271

**COVID-19 Vaccination Accommodation Request Form**

If you are requesting an exception to the Company's mandatory vaccination policy due to your (1) disability or medical condition, or (2) sincerely held religious belief, practice or observance, please complete this form and submit it to \_\_\_\_\_.

1. If you are unable to receive a COVID-19 vaccination due to a disability or medical condition:
- a. Please explain the nature of the limitations resulting from your disability or medical condition and how they prevent you from receiving a COVID-19 vaccination. (Please do not disclose the underlying condition or any genetic information.)

- b. Is your limitation that prevents you from receiving the COVID-19 vaccination permanent or temporary? If temporary, when will you be able to receive the COVID-19 vaccination?
- 

- c. Please attach documentation from your medical provider confirming the existence of a disability or medical condition, the duration and resulting limitations, and providing information about how those limitations prevent you from receiving the COVID-19 vaccination. (Please do not disclose the underlying condition or any genetic information.)

The Company may ask to discuss your request with your doctor if the documentation provided is not sufficient to evaluate your accommodation request.

2. If you are unable to receive a COVID-19 vaccination due to a sincerely held religious belief, practice or observance, please explain the nature of your religious belief, practice or observance and how it prevents you from receiving a COVID-19 vaccination.

My sincerely held religious beliefs do not allow me to receive the COVID-19 vaccine, since, the vaccines are created using aborted fetal cells. "For you created my innermost being. You knit me together in my mother's womb." Psalm 139:13. I will not knowingly participate in the process to use such a product that violates the right to life and dishonors the lives of the unborn. I cannot receive a Covid vaccine under any circumstances.

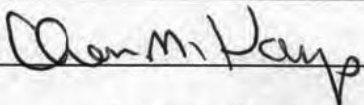
If necessary to evaluate your accommodation request, the Company may ask to discuss the nature of your religious belief, practice or observance and accommodation request with your religion's spiritual leader (if applicable) or another third party who is aware of your religious belief, practice, or observance.

**Verification:**

I verify that the above information is true and accurate and I understand that any misrepresentation may result in disciplinary action, including termination of employment and/or withdrawal of my offer of employment.

Name: Cheron Hayes

Date: 2/25/22

Signature: 

Personnel Number (PERNR): 00350271

Contact Phone: 407-982-0960

Work Location: \_\_\_\_\_





### RELIGIOUS EXEMPTION FROM COVID-19 VACCINATION

<b>Employee Name</b> Cheron Hays	<b>Date of Birth</b> 3/22/67	<b>Phone Number</b> 407-982-0360
<b>Employer Name</b> The Walt Disney Company	<b>Date of Request</b> 2/25/22	

<b>Exemption Statement</b>	
Pursuant to section 381.00317, Florida Statutes:	
I hereby declare that I decline the COVID-19 vaccination because of a sincerely held religious belief, which may include a sincerely held moral or ethical belief.	
<b>Employee Signature</b> Cheron Hays	<b>Date</b> 2/25/22
<b>Employee Name (print)</b> Cheron Hays	

**NOTE: An employer shall not inquire into the veracity of the employee's religious beliefs. Pursuant to section 381.00317(2), Florida Statutes, this completed exemption statement requires the employer to allow the employee to opt-out of the employer's COVID-19 vaccination mandate.**

# EXHIBIT R

---

**From:** Koepke, Cathryn <Cathryn.Koepke@disney.com>  
**Sent:** Thursday, January 27, 2022 3:24 PM  
**To:** Cathy Koepke  
**Subject:** FW: Cathy Vaccination Accommodation Request

---

**From:** Koepke, Cathryn  
**Sent:** Tuesday, January 11, 2022 5:16 AM  
**To:** Freedman, Debra <Debra.Freedman@disney.com>  
**Cc:** Dye, Marisa L. <Marisa.L.Dye@disney.com>  
**Subject:** RE: Cathy Vaccination Accommodation Request

Hi Debra,

I did meet with the allergist on Friday and she did state that I have an autoimmune disorder and could be at risk in taking the vaccine but unfortunately she would not write me an exemption letter because my health conditions do not fall under the guidelines of the CDC. Dr. Lisa Sullivan could not guarantee me that I will not have an allergic reaction nor would they accommodate me if something were to happen to me but she will not write me an exemption letter. I do have all the test results and can show you that I have markers to potential autoimmune disorder that the vaccine might trigger but not enough that the allergist will exempt me from taking the vaccine.

As I stated to you in my original meeting I will not get the vaccine due to the adverse reactions that I had taking a flu vaccine three years ago that put me in the hospital. I have had COVID twice and never have been hospitalized when I contracted COVID. In 2019 I had a severe case of COVID but was never hospitalized and my immunity system was able to fight it off naturally. I also contracted COVID in early December of 2021. I had a minor symptoms of running nose and a mild headache. That was all. I quarantined during that time and did not infect any others around me.

The Cleveland Clinic and Harvard Medicine have come out with excellent studies that indicate natural immunization is far better than the vaccine. Israel has also conducted studies and have found that individuals who have not been vaccinated but have gotten COVID have been able to fight off the virus better than those that are vaccinated. You are seeing that even those who are fully vaccinated are still getting the virus. The whole purpose of the virus is to minimize and cut down on hospitalizations. As I have stated, I have had COVID twice and neither time was hospitalized. I was able to fight off the infection with vitamins, exercise and eating healthy.

I do want you both to know that I love my job and working for Disney and I am willing to do whatever you need for me to keep Disney employees safe. I currently work remote out of my IL office and never go into a Disney office. If I ever did need to attend an meeting I would be willing to take PCR tests and or Antigen tests and wear a mask all day.

I am deathly afraid to take the vaccines because of my adverse reaction that I had three years ago taken the flu shot. At this point no doctor can guarantee me that I will not have another severe reaction to any of the vaccines. None of the pharmaceutical companies bear no liability for injuries or deaths resulting from their products. The covid-vaccine makers are allowed to create a one-size-fits all product, with no testing on sub-populations (i.e. people with specific health conditions) and yet they are unwilling to accept any responsibility for any adverse events or deaths their products cause. I will not take a vaccine that is still in an experimental phase and not approved by the FDA. All the vaccines are still in the experimental phase even though they have supposedly passed the safety standards. We are also seeing that the vaccines do not "stop" transmission or the infection. There are just as many if not more individuals who are vaccinated that are still getting COVID. The vaccines can't stop us from spreading the virus; it can't stop the virus from

infecting us once we have it; and to get the vaccine is to accept the risk of these experimental products and the best the vaccine might do is lower symptoms. I can sight statistics of the number of cases where people are getting vaccinated and still getting COVID and some with severe symptoms. I can honestly say that I have never been vaccinated, have gotten COVID but still able to fight off the infection with minor symptoms. My natural immunities recognize the virus and they know how to fight it.

The other question I have is why are we requiring people to get vaccinated when the CDC states that COVID at a 99.7% survival rate. Why would I take a risk on a product that doesn't stop infection or transmission, to help me overcome a cold that has a .26% chance of killing me. I have a higher chance based on past experience of having an adverse reaction and becoming ill from the vaccine.

I did state in my appeal that I will take the vaccine if Disney will compensate me and or my family if I were to have any adverse reactions to the vaccine or die from taking the vaccine. Not one of the doctors that I have gone to can guarantee that I will not have an adverse reaction to the vaccine. All they can say is that I do not have a medical condition stated by the CDC to warrant an health exemption.

As I stated in my original appeal I am a widow and lost my husband tragically in a car accident three years ago. I do not want to get vaccinated and have a severe reaction only to leave my children without parents. It is my constitutional right as a citizen of the United States to decide on what is best for me and my health. As it stands now I have had COVID twice and have survived it without ever entering a hospital. I have a strong immune system that does not require me taking an experimental vaccine. I am not an anti-vaxer and have taken vaccines in the past. I chose not to take this vaccine because it is still in its experimental phase and there is a lot of very good evidence that natural immunity is just as good if not better than the vaccine. I have natural immunity because I have had COVID twice and have successfully fought off the infection twice without ever entering the hospital.

I also chose not to take this vaccine because it is against my religious beliefs. I have filed two appeals. A religious appeal and the health appeal. I would still like to exercise my rights that this vaccine goes against my religious beliefs because I do not believe in using human fetuses for testing or otherwise. I am pro-life and have been my whole life. I do not believe in abortion and I go to a religious natural health food store where I purchase all my vitamins that have no fetuses used in the products or during the testing phase.

I ask you to please accept my appeal and please allow me to continue to work at Disney. I love my job and I do a good job for the company. I am a widow who has no other means to take care of myself. I have gone through so much in my life in dealing with the tragic loss of my husband that to lose a job I love because of a vaccine would be tragic. I love my children and I don't want to leave them without having parents. I am very afraid based on past experience that could very easily happen.

As I have stated in my prior appeal, if Disney will sign a document stating they will cover damages due to any adverse reactions that I experience then I will consider taking the vaccine.

In closing I do have the extensive reports and testing that was completed by the allergist if you would like for me to send. The allergist is going to follow-up with me in 3-4 months to run more tests on my immunity system seeing they did see I have issues.

Please let me know what my options are at this point in time.

Best wishes,

Cathryn Koepke

---

From: Freedman, Debra <[Debra.Freedman@disney.com](mailto:Debra.Freedman@disney.com)>

Sent: Monday, January 10, 2022 2:01 PM

To: Koepke, Cathryn <[Cathryn.Koepke@disney.com](mailto:Cathryn.Koepke@disney.com)>  
Cc: Dye, Marisa L. <[Marisa.L.Dye@disney.com](mailto:Marisa.L.Dye@disney.com)>  
Subject: RE: Cathy Vaccination Accommodation Request

Hi Cathryn,

I'm following up with you after your appointment on Friday. Do you have a note to submit for your request for an accommodation?

Happy new year,  
Debra

*Debra Freedman*

Phone: 818 726-9725

---

**From:** Koepke, Cathryn <[Cathryn.Koepke@disney.com](mailto:Cathryn.Koepke@disney.com)>  
**Sent:** Wednesday, December 29, 2021 12:51 PM  
**To:** Freedman, Debra <[Debra.Freedman@disney.com](mailto:Debra.Freedman@disney.com)>  
**Cc:** Dye, Marisa L. <[Marisa.L.Dye@disney.com](mailto:Marisa.L.Dye@disney.com)>  
**Subject:** RE: Cathy Vaccination Accommodation Request

That sounds good Debra. In the meantime I hope you have a wonderful New Years.

Thank you for your follow-up and your help during this process.

Best,

Cathryn Koepke

---

**From:** Freedman, Debra <[Debra.Freedman@disney.com](mailto:Debra.Freedman@disney.com)>  
**Sent:** Wednesday, December 29, 2021 2:04 PM  
**To:** Koepke, Cathryn <[Cathryn.Koepke@disney.com](mailto:Cathryn.Koepke@disney.com)>  
**Cc:** Dye, Marisa L. <[Marisa.L.Dye@disney.com](mailto:Marisa.L.Dye@disney.com)>  
**Subject:** RE: Cathy Vaccination Accommodation Request

Thanks Cathryn, for the update. Let's touch base after your appointment.  
Debra

---

**From:** Koepke, Cathryn <[Cathryn.Koepke@disney.com](mailto:Cathryn.Koepke@disney.com)>  
**Sent:** Wednesday, December 29, 2021 11:15 AM  
**To:** Freedman, Debra <[Debra.Freedman@disney.com](mailto:Debra.Freedman@disney.com)>  
**Cc:** Dye, Marisa L. <[Marisa.L.Dye@disney.com](mailto:Marisa.L.Dye@disney.com)>  
**Subject:** RE: Cathy Vaccination Accommodation Request

Hi Debra,

They had to reschedule the appointment for January 7. My appointment is set for 2:00 p.m. – 3:00 p.m. (CST) on Friday, January 7. The doctor did a comprehensive allergy test and they are going to go over the results of the tests on Friday, January 7.

I will upload the information following my meeting on January 7.

Best,

Cathryn Koepke

---

**From:** Freedman, Debra <[Debra.Freedman@disney.com](mailto:Debra.Freedman@disney.com)>  
**Sent:** Wednesday, December 29, 2021 1:12 PM  
**To:** Koepke, Cathryn <[Cathryn.Koepke@disney.com](mailto:Cathryn.Koepke@disney.com)>  
**Cc:** Dye, Marisa L. <[Marisa.L.Dye@disney.com](mailto:Marisa.L.Dye@disney.com)>  
**Subject:** RE: Cathy Vaccination Accommodation Request

Hi Cathryn,

I hope you enjoyed your holiday and vacation. I'm following up on the note we discussed for a vaccine medical accommodation a couple months ago. Were you able to get a note from your medical provider? I can provide you instructions for uploading the note to our site.

Looking forward to hearing your thoughts,  
Debra

*Debra Freedman*

Phone: 818 726-9725

---

**From:** Koepke, Cathryn <[Cathryn.Koepke@disney.com](mailto:Cathryn.Koepke@disney.com)>  
**Sent:** Monday, November 15, 2021 9:20 AM  
**To:** Freedman, Debra <[Debra.Freedman@disney.com](mailto:Debra.Freedman@disney.com)>  
**Cc:** Dye, Marisa L. <[Marisa.L.Dye@disney.com](mailto:Marisa.L.Dye@disney.com)>  
**Subject:** RE: Cathy Vaccination Accommodation Request

Hi Debra,

It went very well. They ran a series of prick tests and blood tests. The results of the blood tests will be on December 10. That is when they will go over all my allergies specifically related to the vaccine.

Thank you for your follow-up Debra.

Best,

Cathryn

---

**From:** Freedman, Debra <[Debra.Freedman@disney.com](mailto:Debra.Freedman@disney.com)>  
**Sent:** Monday, November 15, 2021 10:58 AM  
**To:** Koepke, Cathryn <[Cathryn.Koepke@disney.com](mailto:Cathryn.Koepke@disney.com)>  
**Cc:** Dye, Marisa L. <[Marisa.L.Dye@disney.com](mailto:Marisa.L.Dye@disney.com)>  
**Subject:** RE: Cathy Vaccination Accommodation Request

Hi Cathryn,

I hope you are doing well. How did your appointment go with the allergist? Please let us know if you were able to get a note for your vaccine accommodation request.

Thank you,  
Debra

*Debra Freedman*

Phone: 818 726-9725

---

**From:** Koepke, Cathryn <[Cathryn.Koepke@disney.com](mailto:Cathryn.Koepke@disney.com)>  
**Sent:** Monday, October 25, 2021 7:40 AM  
**To:** Freedman, Debra <[Debra.Freedman@disney.com](mailto:Debra.Freedman@disney.com)>  
**Cc:** Dye, Marisa L. <[Marisa.L.Dye@disney.com](mailto:Marisa.L.Dye@disney.com)>  
**Subject:** RE: Cathy Vaccination Accommodation Request

Hi Debra,

I hope you are doing well. I had my first appointment with the allergist at 9:00 a.m. (CST) this morning. I am Dr. Lisa Sullivan MD SC at 737 Saint John's Avenue, Highland Park IL 60035.

They will be performing a blood skin test on Friday, November 12. The purpose of the skin test is to evaluate my immune system and my tolerance to the vaccines.

Please do not hesitate to contact me if you have further questions.

Best,

Cathryn Koepke

---

**From:** Freedman, Debra <[Debra.Freedman@disney.com](mailto:Debra.Freedman@disney.com)>  
**Sent:** Thursday, October 21, 2021 11:06 AM  
**To:** Koepke, Cathryn <[Cathryn.Koepke@disney.com](mailto:Cathryn.Koepke@disney.com)>  
**Cc:** Dye, Marisa L. <[Marisa.L.Dye@disney.com](mailto:Marisa.L.Dye@disney.com)>  
**Subject:** RE: Cathy Vaccination Accommodation Request

Hi Cathy,

As a follow up to our call, here are links to the COVID-19 vaccine resources put together by our company doctors and safety experts.

<https://disney.foleon.com/twdc/moving-forward-together-vaccines/home/>

<https://twdc.insidedisney.com/covid-19-vaccine-information/>

Please let us know if you have any questions.

Kind regards,  
Debra

*Debra Freedman*

Phone: 818 726-9725

-----Original Appointment-----

**From:** Koepke, Cathryn <[Cathryn.Koepke@disney.com](mailto:Cathryn.Koepke@disney.com)>

**Sent:** Monday, October 18, 2021 9:01 AM

**To:** Freedman, Debra

**Subject:** Accepted: Cathy Vaccination Accommodation Request

**When:** Monday, October 18, 2021 1:30 PM-2:00 PM (UTC-08:00) Pacific Time (US & Canada).

**Where:** <https://disney.zoom.us/j/94830619395?pwd=Q1VRbm9DUmk4WUd2Vy9hTVVZRzExdz09&from=addon>



---

**From:** Koepke, Cathryn <Cathryn.Koepke@disney.com>  
**Sent:** Thursday, February 3, 2022 5:10 PM  
**To:** Cathy Koepke  
**Subject:** FW: Vaccine Accomodation Request

---

**From:** Dye, Marisa L. <Marisa.L.Dye@disney.com>  
**Sent:** Thursday, February 3, 2022 4:06 PM  
**To:** Koepke, Cathryn <Cathryn.Koepke@disney.com>  
**Cc:** Brown, Makisha <Makisha.Brown@disney.com>  
**Subject:** RE: Vaccine Accomodation Request

Hi Cathy,

Thank you for your inquiry. Based on the interactive dialogue with you and careful consideration of the materials and information you submitted in support of your request for a religious exemption, the company concluded that your sincerely held religious beliefs did not prevent you from getting the COVID-19 vaccine. Please know that this decision was fully reviewed by the appropriate decision-makers and is the company's final decision.

Best,  
Marisa

---

**From:** Koepke, Cathryn  
**Sent:** Thursday, February 3, 2022 3:56 AM  
**To:** Dye, Marisa L. <[Marisa.L.Dye@disney.com](mailto:Marisa.L.Dye@disney.com)>  
**Cc:** Brown, Makisha <[Makisha.Brown@disney.com](mailto:Makisha.Brown@disney.com)>  
**Subject:** FW: Vaccine Accomodation Request

Hi Marisa,

I have also attached for your review the original email that was sent rejecting the religious accommodation. Please see my email below.

Best,

Cathy

---

**From:** Koepke, Cathryn  
**Sent:** Wednesday, February 2, 2022 8:50 PM  
**To:** Dye, Marisa L. <[Marisa.L.Dye@disney.com](mailto:Marisa.L.Dye@disney.com)>  
**Cc:** Brown, Makisha <[Makisha.Brown@disney.com](mailto:Makisha.Brown@disney.com)>  
**Subject:** Vaccine Accomodation Request

Hi Marisa,

I hope you are doing well. I did want to follow-up with you on why my religious accommodation was denied at Disney. I had sent an email a week ago asking for an explanation and none was never provided.

During our first meeting we had discussed both my health and religious appeal. During our conversation I had stated that I am against having any type of aborted fetuses put into my body and that the mandated vaccines are in direct violation of my religious beliefs. I had also had written a letter stating that and had attached to my appeal. To date I am not sure why my religious appeal was denied and not discussed further.

I have attached for your review copes from the Catholic Church. The Catholic Church has judged that it is permissible for people to accept (under protest) or reject the use of such vaccines.

I had stated very clearly in our interview that I am strongly against abortion. When I was pregnant with my first child he had a rare disease and the doctors had recommended that I abort my child. I felt so strongly against abortion that I did not agree to the abortion and left that doctor.

Once again I feel very strongly about my religious exemption and do feel that if rejected it could be in direct violation of my Title VII of the Civil Rights Act. I stated very specifically I hold sincere religious beliefs against taking any vaccines, or taking those derived from aborted fetal cell lines.

As we know Title VII prohibits two categories of employment practices. It is unlawful for an employer to fail or refuse to hire or discharge any individual, or otherwise to discriminate against any individual with respect to his or her compensation, terms, conditions or privileges of employment, because of the individual's race, color, religion, sex or national origin.

I understood why my medical exemption was denied but never received an explanation as to why my religious exemption was denied by the Accomodation Committee. I would appreciate if I could receive an explanation and understand why one religion is exempted and others are not.

As you can see I really love my job at Disney and want to remain a productive employee with the company. I do not want to lose my employment over a mandated vaccine. I am a good employee that respect the values of this company and truly believe in the end will do the right thing here.

I would appreciate if you could please reconsider my religious exemption and review the attached letters that support my stance on the religious exemption.

I am copying Makisha on this email because tomorrow is supposed to be my last day. I do hope that you can reconsider my position and allow me to stay with the Walt Disney Corporation.

I do look forward to your response to my email as soon as possible.

Best wishes,

**Cathy Koepke**

(pronouns she/her/hers)

The Walt Disney Company | Senior Recruiter, Enterprise Talent Acquisition

Corporate/Communications & PR/ESR/Supply Chain & Global Sourcing

email: [cathryn.koepke@disney.com](mailto:cathryn.koepke@disney.com)

Mobile: 847 643-6402



The **WALT DISNEY** Company

# EXHIBIT S

To whom it may concern,

Based on my understanding of Title VII of the Civil Rights Act, the Emergency Use Authorization Act, the First Amendment to the United States Constitution, and other federal and state laws, I choose to exercise my right to demand a religious exemption to the requirement that I be vaccinated using the Covid-19 shot. This demand for an exemption is based on my deeply held religious beliefs pursuant to my reliance on teachings in the Holy Bible.

The Bible says “ if anyone, then, knows the good they ought to do and doesn’t do it, it is sin for them.” (James 4:17 NIV). My personal convictions are inspired by my study and understanding of the Bible, and personally directed by the true and living God. I am personally convicted that I should not receive any of the three Covid-19 shots presently authorized by the FDA under the Emergency Use Authorization. Although one of the vaccine shots has been given full approval by the FDA, the submitted vaccine shot used in the full approval process has a different ingredient makeup than the vaccine shot on the market right now that is being injected in the arms of Americans under the Emergency Use Authorization. The new version of the shot is not in manufacturing yet.

It is not my responsibility to force my personal religious convictions regarding this matter on other persons as I believe whether to receive a Covid-19 shot is a personal decision to each person ( Romans 14). Where scripture does not expressly instruct on a particular matter, I believe that I am required to search the scripture myself for related truths ( Romans 15:4) and to seek personal guidance from the Holy Spirit ( Acts 2:38-39; Romans 8). If I fail to submit to the personal convictions that the Holy Spirit and scripture has impressed upon me, I will be sinning against God. I have personally searched the scripture and sought guidance from the Holy Spirit to come to my decision.

The Bible states that the body is the Temple of the Holy Spirit. We are commanded to take good care of it, not to defile it, and certainly not to introduce something into it that could potentially harm it ( 1 Corinthians 3:16-17, Corinthians 6:19-20, 2 Corinthians 5:10, and 2 Corinthians 7:1).

The Bible also outlines the fact that God created the body both “fearfully and wonderfully.” (Psalms 139:13-16). The Covid-19 shots work as gene therapy. By manipulating genetic operations, the Covid-19 shots alter what God made (literally assuming the position of God), which I believe to be a sinful practice under these circumstances. These vaccines (by the very disclosure of the vaccine manufacturers) contain carcinogens, neurotoxins, animal viruses, animal blood, allergens, and heavy metals. As the Covid-19 shots are still in the experimental phase of study, I do not believe it would be right for me to introduce these substances into my body because they have not sufficiently been proven to me to be safe and effective. Rather, I believe they may be harmful to my body.

It is worthwhile to provide some context to these assertions by noting that Covid-19 being untreated, has a survivability rate of 99.98% under 50 years of age. Over 50 the survival rate is 99.5%. These are numbers provided by the CDC. This continues to lend credibility to the fact that it would be sinful to seek to undertake a superfluous procedure when the risk is substantially low. Also being the face that I have been tested and proven to have antibodies to the Covid-19 virus which studies have now proven to be more robust than those produced as a result of the vaccine and will be produced for life. Therefore, based on guidance from the Holy Spirit and the Holy Bible, I cannot conscientiously take the Covid-19 shot under these circumstances.

Perhaps the most notably significant reason why the acceptance of these vaccines would be considered sinful centers around the fact that fetal stem cell lines from aborted babies were used in either the initial development and/or testing of Covid-19 shots.<sup>1</sup> By receiving the Covid-19 shots presently available, I believe it would constitute a complicit action in the act of abortion. I believe that abortion is murder and is strictly prohibited in the Bible (Exodus 20:13; Psalms 139:13-16; Jeremiah 1:5; Isaiah 49:15). Psalms 127:3 says that “children are a heritage from the lord, offspring a reward from him.” The fact that aborted stem cells were involved in the origination of the three Covid-19 shots makes the consumption of this vaccine an unthinkable act for me.

In addition to the religious exemption demanded, I have the legal right to be exempt from the vaccine mandate based on Federal Food, Drug, and Cosmetic Act.

Some Covid-19 vaccines are merely authorized, not approved or licensed, by the federal government; they are Emergency Use Authorized (EUA) only. The Federal Food, Drug, and Cosmetics Act states that individuals to whose EUA products are administered must be informed—

- (I) that the Secretary has authorized the emergency use of the product;
- (II) of the significance known and potential benefits and risks of such use, and of the extent to which such benefits and risks are unknown; and
- (III) of the option **to accept or refuse administration** of the product, of the consequences, if any, of refusing administration of the product, and of the Alternatives to the product that are available and of there benefits and risks.

Title 21 U.S.C. § 360bbb-3(e)(1)(A)(ii)(I-III).

Accordingly, the federal court held that the U.S. military could not mandate EUA vaccines to soldiers. Doe #1 v. Rumsfeld, 297 F.Supp.2d 119 (2003). The court held: “...the United States cannot demand that members of the armed forces also serve as guinea pigs for experimental drugs.” Id. at 135. No court has ever upheld a mandate for an EUA vaccine, nor will they do so with the Covid-19 vaccine which has not been licensed or approved by the FDA.

Date: 9/2/2021.

Signed: *Seth Schmidt*

Name (print): Seth Schmidt

Date: 9/5/2021

Pastor's signature: *W. Lewis*

Pastor (print): 

William Lewis
---------------

1 [http://www.health.nd.gov/sites/www/files/documents/COVID%20Vaccine%20Page/COVID-19\\_Vaccine\\_Fetal\\_Cell\\_Handout.pdf](http://www.health.nd.gov/sites/www/files/documents/COVID%20Vaccine%20Page/COVID-19_Vaccine_Fetal_Cell_Handout.pdf);  
[http://leg.la.gov/assist/oph/Center-PHCH/Center-PH/immunizations/You\\_Have\\_Qs\\_COVID-19\\_Vaccine\\_FAQ.pdf](http://leg.la.gov/assist/oph/Center-PHCH/Center-PH/immunizations/You_Have_Qs_COVID-19_Vaccine_FAQ.pdf);  
[http://www.health.nd.gov/sites/www/files/documents/COVID%20Vaccine%20Pages/COVID-19\\_Vaccine\\_Fetal\\_Cell\\_Handout.p](http://www.health.nd.gov/sites/www/files/documents/COVID%20Vaccine%20Pages/COVID-19_Vaccine_Fetal_Cell_Handout.p)

# EXHIBIT T

To whom it may concern at the Walt Disney company,

I Seth Schmidt am being pressured by this company to take the vaccine, and my employment and welfare has been threatened, that if I do not take it I will be terminated. I view this as harassment, I view this as me being forced to do this against my own will and my conscience, and I received this command by the Walt Disney company as something that is diametrically opposed to my first amendment rights.

Therefore I am requiring that a representative of the Walt Disney company sign this statement making clear the fact that from the moment I get the vaccine this corporation will be held responsible for any illness or sickness that results from the vaccine from this moment to the day of my death. A copy has been provided to my safe deposit box, to my attorney and to my family in the event of something going on.

Date:\_\_\_\_\_.

Signed:\_\_\_\_\_

Name (print):\_\_\_\_\_

Date:\_\_\_\_\_.

Representative of the Walt Disney company signature

\_\_\_\_\_