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Attorneys for Defendant
HOME BOX OFFICE, INC.

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

EMMANUEL WRIGHT, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

HOME BOX OFFICE, INC.; WARNER MEDIA,
LLC; 3 ARTS ENTERTAINMENT, LLC;
PLANE MEETS PAPER PRODUCTIONS, LLC;
and DOES 1 through 50, inclusive,

Defendants.

CASE NO. 21STCV19636

*[Assigned for All Purposes to Hon. Maren
Nelson, Dept. 17]*

DECLARATION OF DEEDRA RICKETTS

Complaint Filed: May 24, 2021
FAC Filed: October 12, 2021
SAC Filed: March 2, 2022
TAC Filed: April 4, 2022

DECLARATION OF DEEDRA RICKETTS

I, Deedra Ricketts, declare and state as follows:

1. I am the president of DD Casting (the “Company”). In connection with my role, I have access to the Company’s business records pertaining to casting done by the Company on feature films, television shows and commercials, including communications with the productions for which the Company was placing actors, the communications with actors, casting postings and the like. The following statements are based on my personal knowledge and review of the Company’s business records. If called as a witness, I could and would testify competently thereto.

2. For several years, the Company cast and supplied background actors (also referred to as extras) for the television series *Insecure*.

3. This included casting background actors for scenes shooting during the height of the COVID-19 pandemic on April 9, 2021 and May 24, 2021, both of which required the background actors to participate in a prophylactic hotel quarantine for five days in advance of filming.

4. The protocols for the pre-production quarantines for both the scenes shot on April 9, 2021 and May 24, 2021 were explained in correspondence prepared by the *Insecure* production and sent to participating background actors by the Company. This correspondence explained, among other things, that background actors were to sequester in their hotel rooms during their five-day quarantine and that all time outside of their hotel room would be chaperoned so that hallways could be cleared to ensure adequate social distancing and those quarantining could avoid the need to encounter high-touch surfaces such as elevator buttons and door handles. True and correct copies of the correspondence sent to participating background actors for the April 2021 and May 2021 quarantines are attached hereto as **Exhibits A and B**.

5. Although the pre-production quarantines were a condition of employment for background actors on the April 9, 2021 and May 24, 2021 shoots, to incentivize participation in the quarantines, background actors were paid \$300 for each day spent in quarantine and provided with a daily food stipend to be used at the hotel restaurants.

6. All communications and correspondence with background actors placed on *Insecure*, including all communications to background performers participating in the April and May 2021 quarantines were in writing and in English. Moreover, I understand instructions on set were given in English. As such, I believe that all background performers can read in English.

I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct.

Executed on January 26, 2024 in Los Angeles California.

DocuSigned by:

Deedra Ricketts

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DEEDRA RICKETTS

McDERMOTT WILL & EMERY LLP
ATTORNEYS AT LAW
LOS ANGELES

EXHIBIT A

Hello Background Talent,

Welcome to the Insecure quarantine! This will be taking place at the Los Angeles Marriott Burbank Airport from Sunday April 4th to Friday April 9th.

2500 N Hollywood Way,
Burbank, CA 91505
United States

Upon arrival Sunday you will park in the guest parking (the cost of one space per room will be covered by production), and proceed to check-in. At check-in you will need to provide a credit card for incidentals. You will be given a room key good for one time access. After entry to your room, you will only be able to leave during scheduled "out-of-room" time escorted by a member of our covid team. During this time we can take you outside for fresh air (or smoke breaks if necessary), and we will be able to grant you access back into your room. Other than this time please be prepared to remain in your room for the duration of this quarantine.

For "out-of-room" time you will be required to wear a fresh KN95 and socially distance from your escort as much as possible. Our team will make contact with any high-touch surfaces for you (elevator buttons, and door handles). When you return to your room, please wash your hands with soap and water for at least 30 seconds.

You will be given a \$60/day food stipend to spend at the restaurants on premises (a total of \$300 for the week), this cannot be used on alcohol. Anything over \$60 in a day will be charged to the credit card on file, and any leftover stipend will roll over to the next day but will not be reimbursed to you at the end of your stay. Coffee makers are in every room, and we will have water and snacks available upon request just let a member of our team know. Please be sure to place breakfast orders by 9pm the night before, if you would like to order from the breakfast menu. Lunch specials are offered from 11am-4pm, and last call for dinner is 10pm on Sunday/9pm for the rest of quarantine.

Housekeeping will not be maintaining rooms throughout the week, but rooms will be stocked with extras of everything should you feel the need to replace something. Trash will be collected at 9am, 3pm, and 9pm, so if you need your trash taken out just place the bag outside of your room.

Friday morning we have a preliminary 8:30 am crew call, and it will be self-drive to the studio. Please continue to keep socially distanced from your room to your car. You should have your wardrobe prepared in advance of your stay.

While our goal is to limit your exposure to hotel staff as much as possible, please be respectful if you do come in contact with them.

For COVID testing, our staff will come to your room. If you have any questions, don't hesitate to reach out.

Thank you,
Andalusia Kear
Covid Foreperson Quarantine
Andalsuia.kear@hboprod.com
(323) 820-8667

EXHIBIT B

Hello Background Talent,

Welcome to the Insecure quarantine! This will be taking place at the Los Angeles Marriott Burbank Airport from Wednesday May 19th to Monday May 24th.

2500 N Hollywood Way,
Burbank, CA 91505
United States

Upon arrival Sunday you will park in the guest parking (the cost of one space per room will be covered by production). Don't leave anything in your car that you will need, because you will not be able to return to your car until Monday. I highly recommend packing light.

At check-in you will need to provide a credit card for incidentals. You will be given a room key good for one time access. After entry to your room, you will only be able to leave during scheduled "out-of-room" time escorted by a member of our covid team. During this time we can take you outside for fresh air (or smoke breaks if necessary), and we will be able to grant you access back into your room. Other than this time please be prepared to remain in your room for the duration of this quarantine.

For "out-of-room" time you will be required to wear a fresh KN95 and socially distance from your escort as much as possible (please also wear your mask anytime you open your door for room service or to take out trash. Our team will make contact with any high-touch surfaces for you (elevator buttons, and door handles). When you return to your room, please wash your hands with soap and water for at least 30 seconds.

You will be given a \$60/day food stipend to spend at the restaurants on premises (a total of \$300 for the week), this cannot be used on alcohol. Anything over \$60 in a day will be charged to the credit card on file, and any leftover stipend will roll over to the next day but will not be reimbursed to you at the end of your stay. Coffee makers are in every room (for more coffee or tea contact housekeeping on your room phone), and we will have limited soda and snacks available upon request just let a member of our team know by calling 7621 from your room phone. Please be sure to place breakfast orders by 9pm the night before, if you would like to order from the breakfast menu. Lunch specials are offered from 11am-4pm, and last call for dinner is 10pm Friday-Sunday and 9pm for the rest of quarantine.

Housekeeping will not be maintaining rooms throughout the week, but rooms will be stocked with extras of everything (should you feel the need to replace something contact housekeeping). Trash will be collected at 9am, 3pm, and 9pm, so leave your trash bags outside of your room before then.

Once we have your call times we will prepare, and it will be self-drive to the studio. DO NOT GET DROPPED OFF OR TAKE AN UBER TO THE HOTEL, IF YOU DON'T HAVE A CAR YOU CAN TAKE LET CASTING KNOW YOU WON'T BE ABLE TO DO THIS GIG. Please continue to keep socially distanced from your room to your car. You should have your wardrobe prepared in advance of your stay. If you have any room charges such as going over \$300, settle them over the phone with the front desk prior to departure, NOT IN PERSON.

Basic wi-fi is complimentary, so don't worry about the charge it shows when you log-on. If you have forgotten anything like a phone charger or hygiene products, contact the front desk to purchase it from the gift shop(not my team in 621, they just have snacks).

I am not associated with the casting department, so if you have questions about vouchers and the like please contact the person who hired you. You should be filling out logs daily to my understanding.

While our goal is to have zero exposure to hotel staff, please be respectful of them.

For COVID testing, our staff will come to your room. If you have any questions, don't hesitate to reach out.

Thank you,
Andalusia Kear
Covid Foreperson Quarantine
Andalusia.kear@hboprod.com
(323) 820-8667

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(PROOF OF SERVICE)
[CCP 1013(a)(3)]
STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On January 31, 2024, I served all interested parties in this action the following documents described as: **DECLARATION OF DEEDRA RICKETTS** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

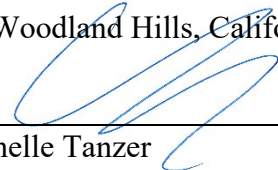
Maria C. Rodriguez mcrodriguez@mwe.com Chris Braham cbraham@mwe.com Ariel Beverly abeverly@mwe.com Yvonne Rivera yrivera@mwe.com Cindy Liu cliu@mwe.com McDermott Will & Emery LLP 2049 Century Park East, Suite 3200 Los Angeles, CA 90067-3206 <i>Attorneys for Defendants</i>	Frank H. Kim fkim@kim-legal.com KIMLEGAL, APC 3435 Wilshire Blvd, Suite 2700 Los Angeles, CA 90010 Helen U. Kim helen@helenkimlaw.com HELEN KIM LAW, APC 3435 Wilshire Blvd, Suite 2700 Los Angeles, CA 90010 <i>Attorneys for Plaintiff</i>
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[XX] BY ELECTRONIC SERVICE: I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing (“EF”) System (<https://dir.tfaforms.net/315>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

[XX] (BY ELECTRONIC MAIL THROUGH CASE ANYWHERE): On interested Parties set forth on the service list.

[XX] (STATE): I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on January 31, 2024, at Woodland Hills, California.



Michelle Tanzer