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

LARONDA RASMUSSEN et al., Plaintiffs, v. THE WALT DISNEY COMPANY et al., Defendants.	Case No. 19STCV10974 **DECLARATION OF CERISE CASTLE IN SUPPORT OF MOTION FOR LEAVE TO PARTICIPATE AS AMICUS CURIAE TO OPPOSE DEFENDANTS' MOTIONS TO SEAL DOCUMENTS** Hearing Date: December 8, 2023 Hearing Time: 11:00 am Department: 6 Hon. Elihu Berle

DECLARATION OF CERISE CASTLE

I, Cerise Castle, declare and state as follows:

1. I am the Managing Editor of KnockLA, a nonprofit community journalism project dedicated to telling the real story of Los Angeles.

2. In addition to serving as Managing Editor and contributor to KnockLA, I have produced and hosted segments for the Emmy-award winning nightly news program, VICE News Tonight, and NPR as well as series for the podcasting giant, Wondery. My reporting and commentary have been featured in publications like The Daily Beast, The Los Angeles Times, Los Angeles Magazine, and MTV.

3. Knock LA, then styled KNOCK.LA, began life as a Medium blog in 2017. It was created by members of Ground Game LA, a grassroots community organizing group, to fill the gap in alt-weekly coverage of Los Angeles left by the death of LA Weekly. Then as now, Knock LA was powered by passionate journalists, organizers, and advocates working together to bring a new perspective to Angelenos.

4. KnockLA believes in the tradition of community organizing and journalism as a public service. We believe that, when unobserved and underreported, power leads to corruption.

5. KnockLA seeks to create accurate and reliable hyperlocal coverage of Los Angeles exploring critical issues like law enforcement misconduct, the housing and homelessness crisis, and corporate labor abuses. For example, on July 14, 2023, we published a story titled "LA Workers are Taking to the Streets." In that piece, we discussed six major labor actions in Los Angeles against large corporate entities, including Amazon, UPS, and the Alliance of Motion Picture and Television Producers.

6. KnockLA has a demonstrated commitment to protecting freedom of the press and demanding government transparency. Our reporters routinely file public records requests and review court records or attend court hearings.

7. We have previously moved to unseal court records that are of public interest. In 2022, we were successful in unsealing a search warrant executed by the Los Angeles Sheriff's

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1   Department after arguing that the Sheriff's Department could not show a valid basis for

2   keeping the search warrant sealed two years after execution.

3   8.   Covering stories about issues impacting workers in Los Angeles and statewide is important

4   to KnockLA. Stories about this case matter not just to people employed by Disney, but to all

5   members of the community who seek to better understand how workplace discrimination

6   operates or how large companies profit from the labor of underpaid workers.

7   I declare under penalty of perjury under the laws of the state of California that the

8   foregoing is true and correct, executed this 23rd day of October, 2023, in Los Angeles, California.

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11   Cerise Castle

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