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Attorneys for Plaintiffs, American Airlines Flow-Thru
Pilots Coalition, Gregory R. Cordes, Dru Marquardt,
Doug Poulton, Stephan Robson and Philip Valente III

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

<p>AMERICAN AIRLINES FLOW-THRU PILOTS COALITION, GREGORY R. CORDES, DRU MARQUARDT, DOUG POULTON, STEPHAN ROBSON and PHILIP VALENTE III, on behalf of themselves and all others similarly situated Plaintiffs,</p> <p>v.</p> <p>ALLIED PILOTS ASSOCIATION and AMERICAN AIRLINES, INC. Defendants.</p>	<p>Case No.: 3:15-cv-03125 RS</p> <p>PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR APPOINTMENT OF THE LAW OFFICE OF TIMOTHY MCGONIGLE P.C. AND BRAUNSTEIN & BRAUNSTEIN, P.C. AS CLASS COUNSEL; MEMO. OF POINTS AND AUTHORITIES</p> <p>DATE: April 4, 2019 TIME: 1:30 p.m. CTRM: 3. 17th Floor</p>
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TO ALL PARTIES AND THEIR ATTORNEY(S) OF RECORD:

PLEASE TAKE NOTICE THAT at 1:30 p.m. on April 4, 2019, or as soon thereafter as the matter may be heard, in Courtroom 3 on the 17th floor of the United States District Court for the Northern District of California at 450 Golden Gate Avenue, San Francisco, California 94102, Plaintiffs, American Airlines Flow-Thru Pilots Coalition, Gregory R. Cordes, Dru Marquardt, Doug Poulton, Stephan Robson and Philip Valente III will and hereby do move this Court for an order appointing the Law Office of Timothy McGonigle P.C. and Braunstein & Braunstein, P.C. as Class Counsel.

This motion is made under the Court's authority to appoint class counsel and on the grounds that such action is required in order to protect the interests of the class following class counsel's abandonment of the case, pursuant to Northern District of California Civil Local Rules 7-2 and 7-4.

This Motion is based on this Notice of Motion and Motion, the accompanying Memorandum of Points and Authorities; the supporting evidence filed in connection with this Motion (the Declarations of Timothy McGonigle; George G. Braunstein; Clark Anthony Braunstein), and the evidence previously filed on behalf of Plaintiff's prior Motion for a Stay and For an OSC re. Adequacy of Class Counsel (Dkt. No. 152) (including but not limited to the Declarations of Gregory Cordes, Gavin Mackenzie, Artemas Keitt ("Kit") Darby, Timothy McGonigle, George Braunstein and John L. Gavello) and the evidence filed in support of the Plaintiffs' Motion to Continue Trial Date, Discovery Cut-off, Expert Deadlines, etc. (Dkt. No. 155); all of the Court's pleadings and papers on file in this matter; and upon such further evidence and argument as may be presented at or before the hearing of this motion.

Dated: February 28, 2019

TIMOTHY D. MCGONIGLE PROF. CORP.

By: /s/ Timothy D. McGonigle
Timothy D. McGonigle

BRAUNSTEIN & BRAUNSTEIN, P.C.

By: /s/ George Braunstein
George Braunstein
Clark Anthony Braunstein

Attorneys for Plaintiffs, American Airlines Flow-Thru
Pilots Coalition, Gregory R. Cordes, Dru Marquardt,
Doug Poulton, Stephan Robson and Philip Valente III

MEMORANDUM OF POINTS AND AUTHORITIES

I. INTRODUCTION

In its Order dated February 13, 2019 (Dkt. No. 154) (the “Order”), following the filing of Plaintiffs’ Motion for a Stay etc. (Dkt. No. 152) and defendant Airline Pilots Association’s (“APA”) Opposition/Response (Dkt. No. 153), this Court relieved Attorney Christopher Katzenbach from his prior role as class counsel. Implicitly, that Order recognized that the Mr. Katzenbach was no longer adequately representing Plaintiffs.

The factual record makes it clear that this lack of adequate representation persisted in this case for a significant period of time, notwithstanding the fact that Mr. Katzenbach was still actively participating in discovery in December 2017 (Dkt.153-1 Rosenthal Decl. ¶6 page 2 of 17), filed an opposition to a Motion in Limine in March 2018 (Dkt. 118), and made court appearances on behalf of Plaintiffs in June and August 2018 (Dkt. 135 &145) and in the related action 3:17-cv-01160-RS on December 20, 2018 (Dkt. 84).

The Order further required new plaintiffs’ counsel (attorneys McGonigle and Braunstein) to move forthwith to be appointed as Class Counsel. Plaintiffs hereby request that the Law Office of Timothy McGonigle P.C. and Braunstein & Braunstein, P.C. be appointed as Class Counsel. (Dkt. 153.)

II. BACKGROUND

The named plaintiffs in this class action are five individual pilots and an association of more than 150 similarly-situated pilots who were employed by an airline named “American Eagle”— a collective name for several affiliates of American Airlines (“AA”). In 1997, American Eagle pilots became eligible to become pilots at AA by virtue of a so-called “Flow-Thru Agreement.” Plaintiffs contend that defendant APA discriminated against them.

Mr. Katzenbach filed the initial complaint in this action on July 6, 2015 (Dkt. No. 1)

and a Second Amended Complaint on January 22, 2016 (Dkt. No. 38). On June 16, 2016, this Court issued an order granting summary judgment in favor of the APA on certain claims and certified the class on the remaining claim. (Dkt. No. 67), with the APA's consent.

III. LAW OFFICE OF TIMOTHY MCGONIGLE P.C. AND BRAUNSTEIN AND BRAUNSTEIN P.C. SHOULD BE APPOINTED AS CLASS COUNSEL TO REPLACE KATZENBACH

The primary duty of class counsel is to fairly and adequately represent the interests of the class. *See* Fed. R. Civ. P. 23(g)(4). Furthermore, adequate representation is constitutionally mandated. *Phillips Petroleum Co. v. Shutts* (1985) 472 U.S. 797, 812, 105 S.Ct. 2965, 2974, 86 L.Ed.2d 628, 642. Following the effective abandonment by former class counsel, and the finding of this Court that former class counsel is not providing adequate representation, the interests of the absent class members are at risk in the event that new counsel is not promptly appointed to “step into the breach” caused by former class counsel’s abandonment.

Federal Rule of Civil Procedure Rule 23(g)(1) provides that “a court that certifies a class must appoint class counsel.” Additionally, Rule 23(g)(1)(E), provides the court with inherent powers to “make further orders in connection with the appointment.” As such, Plaintiffs respectfully requests that the Court appoint the Law Office of Timothy McGonigle P.C. and Braunstein & Braunstein, P.C. as new class counsel.

In appointing class counsel, the Court considers counsel’s work (1) “in identifying or investigating potential claims in the action,” (2) “counsel’s experience in handling class actions,” (3) “counsel’s knowledge of the applicable law” and (4) “the resources that counsel will commit to representing the class.” Fed. R. Civ. P. 23(g)(1)(A)(i)-(iv).

As set forth in the declarations of Timothy McGonigle, George Braunstein and Clark Anthony Braunstein (collectively, “New Counsel”), New Counsel are well-qualified to

prosecute this case on behalf of the named Plaintiffs and the other members of the Class, and have already undertaken considerable efforts to protect the interests of the class from the effects of the abandonment by prior class counsel, including seeking intervention by the State Bar, and by filing two motions seeking relief from this Court, including a motion for a trial continuance and for an order requiring former class counsel to turn over his file to New Counsel.

New Counsel have extensive practical experience in the employment litigation area, and recently prosecuted a multi-plaintiff employment action to a multi-million dollar jury verdict. (McGonigle Decl. at ¶ 6, George Braunstein Decl. at ¶ 5.) Further, Clark Anthony Braunstein has substantial experience in class actions and has been appointed class counsel in prior employment class actions in California. (See Decl. Of Clark Anthony Braunstein at ¶ 4.) Additionally, the attorneys Timothy McGonigle and George Braunstein each have over 30 years of experience litigating complex actions in state and federal court. (See McGonigle Decl. ¶ 5, and George Braunstein Decl. ¶ 2)

New Counsel also have experience in the field of labor employment and union law (George Braunstein Decl. ¶ 8). and Clark Anthony Braunstein has represented a number of unions and union members in labor and employment cases and has represented nationwide unions in litigation matters, including in trials and appeals. (Clark Anthony Braunstein Dec. at ¶ 5.) As such, New Counsel are well versed in the issues and law that impact this litigation. Finally, New Counsel have the resources to pursue this action, including fund-raising by the AAFTPC. (See Decl. ¶ 11 of Timothy McGonigle; George Braunstein Decl. ¶ 9)

Since the forgoing matters are met, Plaintiffs request that Law Office of Timothy McGonigle P.C. and Braunstein & Braunstein, P.C. be jointly appointed as Class Counsel in this matter.

IV. CONCLUSION

For all of the above-stated reasons, it is respectfully requested that this Court grant the relief requested by this Motion.

DATED: February 28, 2019

TIMOTHY D. MCGONIGLE PROF. CORP.

By: /s/ Timothy D. McGonigle
Timothy D. McGonigle

BRAUNSTEIN & BRAUNSTEIN, P.C.

By: /s/ George Braunstein
George Braunstein

Attorneys for Plaintiffs, American Airlines Flow-Thru Pilots
Coalition, Gregory R. Cordes, Dru Marquardt, Doug Poulton,
Stephan Robson and Philip Valente II

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Pilots Coalition, Gregory R. Cordes, Dru Marquardt,
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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

AMERICAN AIRLINES FLOW-THRU
PILOTS COALITION, GREGORY R.
CORDES, DRU MARQUARDT, DOUG
POULTON, STEPHAN ROBSON and
PHILIP VALENTE III, on behalf of
themselves and all others similarly situated
Plaintiffs,

v.

ALLIED PILOTS ASSOCIATION and
AMERICAN AIRLINES, INC.
Defendants.

Case No.: 3:15-cv-03125 RS

DECLARATION OF CLARK ANTHONY
BRAUNSTEIN IN SUPPORT OF MOTION
FOR APPROVAL AS CLASS COUNSEL

DATE: April 4, 2019
TIME: 1:30 p.m.
CTRM: 3. 17th Floor

DECLARATION OF CLARK ANTHONY BRAUNSTEIN

I, Clark Anthony Braunstein, hereby declare that:

1. I am counsel for the Plaintiffs in the above captioned case. I have personal knowledge of the facts stated in this declaration, and if called as a witness, I could testify competently to those facts.
2. I am a Partner at the Law Office of Braunstein & Braunstein PC. I have been practicing law for 8 years, concentrating in employment and labor law litigation. I am a member of the California Bar and I am also a member of the Northern, Southern Districts in California and the Ninth Circuit Courts.
3. I have experience in the area of labor and employment law and complex and class action litigation. My practice and experience includes both traditional labor law and non-traditional areas of employment law. I have tried adversary proceedings, both in arbitration and in state court. I
4. I have been appointed as Class Counsel and represented over 350 class members in the matter of *Margarita Bran vs. Angelica Textile Services, Inc.* in San Bernardino Superior Court, Case No. CIV DS 1208153. Additionally, I have been appointed Class Counsel and represented over 500 class members in the matter of *Ines Gomez vs. Magic Laundry Services, Inc.* in Los Angeles Superior Court, Case No. BC518724. Both of these cases involved complex labor and employment issues.
5. Additionally, I am well versed in labor and employment law including claims involving labor unions. I have represented labor unions in complex litigation in state and federal courts litigation, including Major League Baseball Players Association and Western States Regional Joint Board.

6. The issues raised in this case involve the union's duty of fair representation and obligations under collective bargaining agreements that are claims as to which I am familiar with.

7. In this case, plaintiffs are seeking a remedy for two claims:

a. For denial of length of service (LOS) credits for time FTPs were working as jet captains at American Eagle but had been unable to transfer to or work at American after September 2001 until June 2010 when FTPs began transferring to American. These LOS credits are used for both pay and other purposes. This claim arises from the following discrimination against FTPs alleged in this action:

(i) The plaintiffs contend that the former TWA pilots, including the TWA-LLC Staplees, received LOS credit for their work at TWA and for the period after American acquired TWA's assets when former TWA pilots were not flying at American, including time when former TWA pilots were flying at American Eagle under the flow-down provisions of the Flow-Through Agreement.

(ii) In addition, in the most recent collective bargaining agreement between APA and American, any pilot on furlough since September 11, 2001 received an additional two years of LOS credit. This credit is described in Letter G to the collective bargaining agreement. A copy of Letter G is attached to this declaration. The plaintiffs contend that all the TWA-LLC Staplees received the LOS credits in Letter G, including TWA-LLC Staplees who had flowed down to American Eagle and displaced FTPs from their jobs.

b. In the current seniority list integration proceedings, there is a significant issue of

how years of service as a pilot (“longevity”) will be a factor in placement on the integrated list. I understand that APA has refused to put on evidence or argue that FTPs’ service at American Eagle should be included as part of any longevity factor that should be used. Plaintiffs are seeking to have any seniority list set aside if longevity is a factor and service at American Eagle is not included. The plaintiffs believe that failure to include service at American Eagle would be a product of APA breach of its duty of fair representation and the seniority integration would therefore not have been done in a fair and equitable manner, as required by the McCaskill-Bond Amendment, Pub.L. 110-161, Div. K, Title I, § 117, Dec. 26, 2007, 121 Stat. 2383, codified at 49 U.S.C. § 42112 note, adopting the standards applied by the Civil Aeronautics Board in the Allegheny-Mohawk merger, 59 C.A.B. 45 (1972).

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

Executed at Los Angeles, California on the 28h day of February, 2019.

s/s/Clark Anthony Braunstein

Clark Anthony Braunstein

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Pilots Coalition, Gregory R. Cordes, Dru Marquardt,
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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

AMERICAN AIRLINES FLOW-THRU
PILOTS COALITION, GREGORY R.
CORDES, DRU MARQUARDT, DOUG
POULTON, STEPHAN ROBSON and
PHILIP VALENTE III, on behalf of
themselves and all others similarly situated
Plaintiffs,

v.

ALLIED PILOTS ASSOCIATION and
AMERICAN AIRLINES, INC.
Defendants.

Case No.: 3:15-cv-03125 RS

DECLARATION OF TIMOTHY
MCGONIGLE IN SUPPORT OF MOTION
FOR APPROVAL AS CLASS COUNSEL

DATE: April 4, 2019
TIME: 1:30 p.m.
CTRM: 3. 17th Floor

DECLARATION OF TIMOTHY MCGONIGLE

I, TIMOTHY MCGONIGLE, declare under penalty of perjury:

1. I am an attorney for Plaintiffs American Airlines Flow-Thru Pilots Coalition, Gregory R. Cordes, Dru Marquardt, Doug Poulton, Stephan Robson and Philip Valente III in this action. I am an attorney at law duly licensed to practice before this Court and all of the courts of the State of California and am the sole owner of Timothy McGonigle, PC. I am submitting this declaration in support of plaintiffs' Motion for Approval of Class Counsel. I have personal knowledge of the following facts, and if called and sworn as a witness, I could and would competently testify thereto.

2. I earned a Bachelor of Business Administration from the University of Notre Dame in 1980. I earned a Juris Doctorate from Pepperdine University in 1983. I earned a LL.M., Securities Regulation, from Georgetown University School of Law in 1984.

3. I became a member of the California Bar in 1984 and was admitted to practice before the Central District of California on December 14, 1984, and before the Northern District of California on September 7, 1999. Since I was admitted in 1984, I have remained a member in good standing with the State Bar of California at all times and have never been subject to disciplinary proceedings.

4. From September 1984 to October 1985, I was employed as an Associate Attorney for Overton, Lyman & Prince in Los Angeles, California. From October 1985 to October 1987, I was employed as an Associate Attorney for Selvin Weiner & Ruben in Los Angeles, California. I subsequently was a Partner of that firm from October 1987 to December 1991. In January 1992, I formed Ruben & McGonigle in Los Angeles, California, where I was a partner from January 1992 to February 2000. In February 2000, I started my own firm,

Timothy D. McGonigle PC originally in Santa Monica, California, and now located in Los Angeles, California, where I have worked until the present.

5. For over thirty years, I have been representing employers and employees in labor law cases as well as lawyers and clients of former lawyers in attorney malpractice cases. A true and correct copy of my Curriculum Vitae is attached hereto as Exhibit “A” and incorporated herein. I also have extensive experience in handling various types of business litigation and transactional matters. During my career, I have handled numerous claims for both employees and employers involving race discrimination, wrongful termination, wage and hour claims, unfair claims acts as well as numerous other claims.

6. In 2017, along with my co-counsel in this case (George and Clark Braunstein), I represented the plaintiffs and tried the cases entitled *Saied v. Centro Medico Community Clinic, Inc.* and *Bebawy v. Centro Medico Community Clinic, Inc.*, Los Angeles Superior Court Case Nos. BC 492856 and BC499096 to verdict. The cases involved the wrongful termination of two physicians who had founded the Centro Medico medical clinic. The matter went to a jury trial in February 2017, and the jury awarded our clients in excess of six million dollars in damages.

7. In my over thirty years as a lawyer, I have also acted as counsel in hundreds of disputes involving claims of legal malpractice by lawyers. In that time period, I have repeatedly researched, reviewed and litigated issues regarding the standard of care for lawyers in both litigation and transactional matters, including at least one involving an underlying employment class action. I have actually tried one race discrimination claim on behalf of an employer and obtained a defense verdict.

8. I have also handled and/or taken to trial various cases involving breach of contract claims, partnership disputes, unfair competition claims, easement disputes, real estate disputes, including quiet title actions, actions involving transactional documents such as forged deeds, and deeds and liens improperly filed against properties, as well as wills and trusts disputes, especially those involving disputes between beneficiaries, as well as various times where I enforced a settlement reached between the parties. In my over thirty years of practice, I have negotiated the settlement of over two hundred cases, drafted and revised settlement agreements, and enforced various settlement agreements. I also successfully handled an appeal in the reported case entitled *Dolnikov v. Ekizian* (2013) 222 Cal.App.4th 419, which involved a dispute over the use of a roadway easement.

9. During the course of my legal malpractice cases, I have also been involved in handling at least ten cases against defendant law firms who had mishandled a multi-plaintiff claim and/or a claim involving Business and Professions Code 17200, et seq. One of those cases went to trial, entitled *Scat v. Fulwider Patton*, and the jury awarded \$700,000 in favor of my client.

10. During the last 10 years, I have qualified and testified as an expert/ witness concerning legal malpractice matters in one case and I have been retained as an expert/consultant witness approximately 20 times.

11. The American Airlines Flow-Thru Pilots Coalition (AAFTPC) has engaged in fund raising for this lawsuit. I anticipate that it will be able to continue to do so and to provide the resources necessary for this case. I have, to date, expended substantial time in the identification of issues and investigation of the claims in this action. This has involved not only the reviewing of the complaints in this case, but substantial research into the facts and the law. I intend to devote the resources necessary to represent the class in this matter. I

have already committed substantial time and resources to this case. I intend to continue to do so.

I declare under penalty of perjury under the laws of the United States of America that this declaration is true and correct.

Dated this February 28, 2019 at Los Angeles, California.

A handwritten signature in black ink, appearing to read "Tim. McGonigle".

By: _____
Timothy D. McGonigle

TIMOTHY D. MCGONIGLE PROF. CORP.
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Pilots Coalition, Gregory R. Cordes, Dru Marquardt,
Doug Poulton, Stephan Robson and Philip Valente III

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

AMERICAN AIRLINES FLOW-THRU
PILOTS COALITION, GREGORY R.
CORDES, DRU MARQUARDT, DOUG
POULTON, STEPHAN ROBSON and
PHILIP VALENTE III, on behalf of
themselves and all others similarly situated
Plaintiffs,

v.

ALLIED PILOTS ASSOCIATION and
AMERICAN AIRLINES, INC.
Defendants.

Case No.: 3:15-cv-03125 RS

DECLARATION OF
GEORGE G. BRAUNSTEIN
IN SUPPORT OF MOTION FOR
APPROVAL AS CLASS COUNSEL

DATE: April 4, 2019

TIME: 1:30 p.m.

CTRM: 3. 17th Floor

DECLARATION OF GEORGE G. BRAUNSTEIN

I, George G. Braunstein, hereby declare that:

1. I am counsel for the Plaintiffs in the above captioned case. I have personal knowledge of the facts stated in this declaration, and if called as a witness, I could testify competently to those facts.

2. I am a Partner at the Braunstein & Braunstein PC a law firm established by my father in 1952. I have been practicing law for 31 years, concentrating in employment and labor law litigation. I am a member of the State Bar of California and I am also a member of the Northern, Southern Districts in California, the Ninth Circuit Courts and the Supreme Court of the United States. Since I was admitted in 1988, I have remained a member in good standing with the State Bar of California at all time and have never been subject to disciplinary proceedings.

3. I have experience in the area of labor and employment law and complex and class action litigation. My practice and experience includes both traditional labor law and non-traditional areas of employment law. I also have extensive experience in handling various types of employment transactional matters as well as employment litigation.

4. My law firm has been appointed as Class Counsel and represented over 350 class members in the matter of *Margarita Bran vs. Angelica Textile Services, Inc.* in San Bernardino Superior Court, Case No. CIV DS 1208153. Additionally, we have been appointed Class Counsel and represented over 500 class members in the matter of *Ines Gomez vs. Magic Laundry Services, Inc.* in Los Angeles Superior Court, Case No. BC518724. Both of these cases involved complex labor and employment issues.

5. In 2017, along with my co-counsels in this case, (Timothy McGonigle and Clark Braunstein), I represented the medical doctor plaintiffs and tried the cases entitled Saied v. Centro Medico Community Clinic, Inc. and Bebawy v. Centro Medico Community Clinic, Inc., Los Angeles Superior Court Case Nos. BC 492856 and BC499096 to verdict. The cases involved the wrongful termination of two physicians who had founded the Centro Medico Medical Clinic. The matter went to a jury trial in February 2017, and the jury awarded our clients approximately \$6.2 million in damages. This represented one of the highest wrongful employment termination jury verdicts in Los Angeles in 2017, and was widely reported in the media.

6. Over the years, I have also represented numerous labor disputes for motion picture production companies and producers regarding labor disputes, employment contracts and licensing rights. I have served as an expert witness for the motion picture special effects crews, during their labor dispute trial in Los Angeles Superior Court regarding the special effects crew members who were injured in the explosions on the set of Black Dog, a Universal Picture starring Patrick Swayze. I represented the cast of Power Rangers, in their dispute with the studio for higher pay once the series became popular. I represented Juan Gabriel, the late Mexican singer and songwriter, in his highly publicized litigation, in his labor dispute with his concert promoters, in his effort to be able to perform without the promoters taking all his performance fees.

7. I serve as an arbitration judge at the International Court of Arbitration, 36 Cours Albert, Paris France, where I have rendered multi-million dollar decisions regarding international litigation concerning motion picture production and financing, Case No

13599/DK/RCH/JHN Corsan N.V. (Belgium) vs. Gothaer Allgemeine Versicherungsbank, AG (Germany)

8. The issues raised in this case involve the union's duty of fair representation and obligations under collective bargaining agreements that are claims as to which I am familiar with.

9. The American Airlines Flow-Thru Pilots Coalition (AAFTPC) has engaged in fund raising for this lawsuit. I anticipate that it will be able to continue to do so and to provide the resources necessary for this case. I intend to devote the resources necessary to represent the class in this matter. I have already committed substantial time and resources to this case. I intend to continue to do so.

I declare under penalty of perjury under the laws of the United States of America that this declaration is true and correct.

Executed at Los Angeles, California on the 28th day of February, 2019.

/s/George G. Braunstein_

George G. Braunstein

TIMOTHY D. MCGONIGLE PROF. CORP.

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Co-Counsel Attorneys for Plaintiffs, American Airlines Flow-Thru
Pilots Coalition, Gregory R. Cordes, Dru Marquardt,
Doug Poulton, Stephan Robson and Philip Valente III

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

AMERICAN AIRLINES FLOW-
THRU PILOTS COALITION,
GREGORY R. CORDES, DRU
MARQUARDT, DOUG POULTON,
STEPHAN ROBSON and PHILIP
VALENTE III, on behalf of themselves
and all others similarly situated
Plaintiff,

v.

ALLIED PILOTS ASSOCIATION and
AMERICAN AIRLINES, INC.
Defendants.

Case No.: 3:15-cv-03125 RS
[Assigned to Judge Richard Seeborg]

[PROPOSED] ORDER PLAINTIFFS'
NOTICE OF MOTION AND
MOTION FOR APPOINTMENT OF
THE LAW OFFICE OF TIMOTHY
MCGONIGLE P.C. AND
BRAUNSTEIN & BRAUNSTEIN,
P.C. AS CLASS COUNSEL

DATE: April 4, 2019
TIME: 1:30 p.m.
CTRM: 3. 17th Floor

Having considered Plaintiff's Motion for Appointment of the Law Office of Timothy McGonigle, P.C. and Braunstein & Braunstein, P.C. as class counsel, and good cause appearing, the Court:

HEREBY GRANTS

Law Offices of Timothy D. McGonigle P.C. and Braunstein & Braunstein P.C. are hereby appointed class counsel.

IT IS SO ORDERED:

Dated: _____ 2019

HON. RICHARD SEEBORG
UNITED STATES DISTRICT JUDGE

