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Attorneys for Plaintiffs ROBERT HARLOW, JR.
and MARY ALFARDI

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN MATEO

ROBERT HARLOW, JR., individually, and
on behalf of other members of the general
public similarly situated,

Plaintiff,
vs.

COVENANT AVIATION SECURITY, LLC,
an unknown business entity; and DOES 1
through 100, inclusive,

Defendants.

MARY ALFARDI, individually, and on
behalf of other members of the general public
similarly situated;

Plaintiff,
vs.

COVENANT AVIATION SECURITY, LLC,
an Illinois limited liability company; and
DOES 1 through 100, inclusive,

Defendants.

Case No. 20-CIV-03986

*(Consolidated with Case Nos. 20-CIV-03986
and 23-CIV-05656)*

[Assigned for all purposes to the Honorable
Nancy L. Fineman, Dept. 4]

**DECLARATION OF PLAINTIFF MARY
ALFARDI IN SUPPORT OF UNOPPOSED
MOTION FOR FINAL APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Date: September 17, 2024
Time: 2:00 p.m.
Dept: 4

[Filed concurrently with Motion for Final
Approval; Motion for Fees; Declaration of
Ronald H. Bae; Declaration of Tara Zabehi;
Declaration of Robert Harlow, Jr.; and
Proposed Order and Judgment]

[Complaint filed: September 16, 2020]

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ROBERT HARLOW, JR., individually, and
on behalf of other aggrieved employees
pursuant to the California Private Attorneys
General Act;
Plaintiff,
vs.
COVENANT AVIATION SECURITY, LLC,
an unknown business entity; and DOES 1
through 100, inclusive,
Defendants.

DECLARATION OF MARY ALFARDI

I, Mary Alfardi, declare as follows:

1. I am over the age of eighteen, and I am one of two proposed class representatives in this consolidated wage-and-hour class action and representative action against COVENANT AVIATION SECURITY, LLC ("Covenant Aviation"). I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would testify competently to such facts under oath. This declaration is submitted in support of the Motion for Final Approval of the proposed class action and PAGA settlement in this case.

2. I worked for Covenant Aviation as a non-exempt, hourly-paid Security Screener from approximately May 18, 2009 to approximately July 11, 2017. My job duties included screening passengers at the San Francisco International Airport.

3. I believe that I was not paid for all of the hours I worked during my employment with Covenant Aviation. I was not paid for the time I spent riding the shuttle to and from the airport parking lot or parking garage to the terminal where I was assigned to work. Also, I had to pay out of pocket to park at the airport and was not reimbursed. I believe that other employees of Covenant Aviation experienced similar issues, meaning they were not paid for time riding the shuttle and were not reimbursed for parking expenses. I believe that I worked under the same policies and practices that applied to Covenant Aviation's other hourly employees.

4. Through my lawyers, I filed a class action lawsuit against Covenant Aviation on October 5, 2020 (San Francisco Superior Court Case No. CGC-20-586975). The lawsuit sought to recover unpaid wages and unreimbursed expenses on behalf of myself and other similarly situated employees.

5. I understand that a former employee named Robert Harlow, Jr. filed his own lawsuit with similar claims against Covenant Aviation (San Mateo Superior Court Case Nos. 20-CIV-03986 and 20-CIV-05141).

6. I understand that my lawyers (Aequitas Legal Group) agreed to work with the lawyers for Mr. Harlow (Lawyers for Justice) because the cases involve similar claims and cover essentially the same time period. I understand that any attorneys' fees that the Court awards will

1 be split equally between my lawyers and Mr. Harlow's lawyers.

2 7. Since retaining my lawyers in this case, I have understood that I have an obligation
3 to place the interests of the class members in this case above my own and to advance this case
4 toward a favorable outcome on their behalf. I further understood that as a class representative, I
5 have the following duties:

- 6 a. Represent the interests of the class in this case to seek appropriate legal
7 remedies;
- 8 b. Always consider the interest of the class just as I would consider my own
9 interests, and in some cases put the interests of the class before my own;
- 10 c. Always actively participate in the lawsuit, as necessary, by, among other
11 things, answering discovery requests, producing documents, providing
12 information, and giving deposition testimony and trial testimony if needed;
- 13 d. Travel to give my testimony, if necessary; and
- 14 e. Follow the progress of the lawsuit, although I am not required to be
15 particularly sophisticated or knowledgeable about the legal aspects of the
16 case.

17 **My Work on Behalf of the Class**

18 8. Consistent with my duties as a class representative, I have spent a considerable
19 amount of time and effort over the last approximately three years engaging in tasks such as:

- 20 a. Educating myself about the class action process and the claims in this case;
- 21 b. Learning the duties and obligations of a class representative;
- 22 c. Identifying potential witnesses;
- 23 d. Providing my lawyers with detailed information about my work experience
24 at Covenant Aviation;
- 25 e. Searching for and providing the relevant documents in my possession,
26 custody, and control to my lawyers;
- 27 f. Consulting with my lawyers to assist in their investigation and discovery;

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- g. Reviewing the complaint, documents produced by Covenant Aviation, and other documents related to this case;
- h. Engaging in numerous phone calls, email exchanges, and other exchanges of correspondence with my lawyers to discuss various aspects of the case and develop strategy; and
- i. Discussing the settlement in this case with my lawyers, including the terms and ramifications of the settlement.

9. I have spent many hours talking to my lawyers by phone and email to explain the issues that I experienced, provide detailed information about Covenant Aviation's policies and practices, discuss strategy and litigation options, find out what was happening in the lawsuit, asking questions of my lawyers, answer any questions that were asked of me, and discuss other matters related to the lawsuit. It was not always easy to find the time for all of these communications with my lawyers. Still, I took this lawsuit very seriously, so I took as much time as needed to make sure I stayed updated, understood what was happening and why, and gave my lawyers as much information as they needed.

10. Also, I have spent hours reviewing the complaint, my employment records and other documents related to this case. I have reviewed the complaint, my employment records, information relating to Mr. Harlow's claims, the short-form and long-form versions of the settlement agreement, this declaration, and many letters and emails from my lawyers. In total, I have spent approximately 45 to 50 hours working on this lawsuit.

11. I do not believe that I have a conflict with the other non-exempt, hourly paid employees of Covenant Aviation that would inhibit my ability to represent them in this lawsuit.

The Risks I Took on in Serving as a Class Representative

12. I am proud of the benefit to the class that has resulted from my service as a class representative, but taking on this role was risky and has had some negative consequences.

13. In addition to devoting a lot of my personal time to this case to assist my lawyers, I believe that I took a significant risk in suing my former employer because putting my name on a lawsuit like this could hurt my professional reputation. A potential employer could find out that I

1 filed a class action lawsuit by Googling my name or doing online research. If they think there is a
2 risk I could sue them too, that could provide an excuse not to hire me even if I would have gotten
3 the job otherwise.

4 14. Being the class representative has been stressful because it has placed a lot of
5 demands on my limited free time. I have worried about how it might affect my ability to get a job.
6 I was aware that the lawsuit could take years, and it has been over three years so far. I stayed
7 committed to my service as a class representative because I strongly believed that I and other
8 employees like me had been wronged. I am prepared to continue my service as a named plaintiff
9 until this lawsuit is resolved.

10 15. I understand that by filing this lawsuit, I took on the risk of having to pay Covenant
11 Aviation's legal costs if I lost this lawsuit. I understand that this is a significant risk because it
12 could have been thousands of dollars, or more, depending on how long the case lasted and how
13 hard it was fought.

14 16. Also, I am signing a general release as part of the settlement, so I am giving up all
15 claims I may have against Covenant Aviation, not just my wage-and-hour claims. I understand
16 that the class members are only releasing their wage-and-hour claims that were part of this case or
17 are based on the facts in this case. I also understand that I am required to sign a broader release
18 because I am a plaintiff in this case.

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

21 Executed on August 23, 2024, at San Francisco, California.

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23 _____
MARY ALFARDI