

Arby Aiwazian (SBN 269827)
Joanna Ghosh (SBN 272479)
Tara Zabehi (SBN 314706)
Yasmin Hosseini (SBN 326399)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiff Robert Harlow, Jr. and the Class

[Additional Counsel listed on next page]

**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.

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,

Case No.: 20-CIV-03986
*(Consolidated with Case Nos. 23-CIV-05656
and 20-CIV05141)*

Honorable Nancy L. Fineman
Department 4

CLASS ACTION

**DECLARATION OF ROBERT HARLOW,
JR. IN SUPPORT OF PLAINTIFFS'
MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT AND
MOTION FOR ATTORNEYS' FEES AND
COSTS, SETTLEMENT
ADMINISTRATION COSTS, AND
ENHANCEMENT AWARDS**

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

Complaint Filed: September 16, 2020
Trial Date: None Set

Defendants.

Ronald H. Bae (SBN 186826)
Olivia Scharrer (SBN 291470)
Carson M. Turner (SBN 345992)
AEQUITAS LEGAL GROUP
A Professional Law Corporation
1156 E. Green Street, Suite 200
Pasadena, California 91106
Tel.: (213) 674-6080 / Fax: (213) 674-6081

Attorneys for Plaintiff Mary Alfardi and the Class

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1 had, and available to speak and meet with my attorneys whenever they needed me. I responded
2 to them as quickly as possible and gave them as much information and identified as many
3 documents as I could. I spent at least 17 additional hours speaking with my attorneys about the
4 cases, identifying potential witnesses, providing my attorneys with documents and information
5 concerning the cases, and also describing policies, practices, and procedures of Defendant.

6 5. As far as the settlement is concerned, I was available to review documents and
7 answer any questions my attorneys had. I spent about 4 hours reviewing the settlement
8 agreement and about 5 hours asking questions and discussing the potential settlement with my
9 attorneys before signing the settlement agreement.

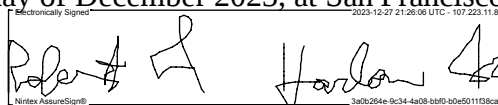
10 6. I believe that I have done everything that my attorneys have asked of me and have
11 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
12 and the State of California. I think my efforts helped to get the result obtained in this matter, and
13 as a class and PAGA representative, I respectfully request that the Court award me an
14 enhancement award in the amount of \$12,500.00 for my active participation in this matter.
15 Taking into consideration the time that I have dedicated to these cases, I believe that this amount
16 is reasonable.

17 7. I am not related to anyone associated with Lawyers *for* Justice, PC or Aequitas
18 Legal Group, APC.

19 8. I have not entered into any undisclosed agreements, nor have I received any
20 undisclosed compensation in this matter. The only compensation I will receive is whatever
21 amount the Court awards as an enhancement award as well as my share of the settlement as a
22 class member and as an aggrieved employee.

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

25 Executed this 12/27/2023 day of December 2023, at San Francisco, California

26 
27 Electronically Signed 2023-12-27 21:28:08 UTC - 107.223.11.81
Written AssuranceSign® 7a0b264e-9c34-4a09-bb0f-b0e5011f58ca

28 Robert Harlow Jr.