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11 Attorneys for Plaintiffs Jacob McKeehan and
12 Robert Marslek, individually,
13 and on behalf of all others similarly situated.

14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

15 **FOR THE COUNTY OF LOS ANGELES**

16 JACOB MCKEEHAN and ROBERT
17 MARSLEK, individually and on behalf of all
18 others similarly situated,

19 Plaintiffs,

20 vs.

21 JETSUITEX, INC.; SUPERIOR AIR
22 CHARTER, LLC; DELUX PUBLIC
23 CHARTER, LLC; and DOES 1 through 20,
24 inclusive,

25 Defendants.

Case No. 2STCV24435

Assigned for all purposes to:

Hon. Elihu M. Berle

Dept. 6

26 **DECLARATION OF JACOB**
27 **MCKEEHAN IN SUPPORT OF**
28 **PLAINTIFFS' MOTION FOR**
PRELIMINARY APPROVAL OF
CLASS AND PAGA SETTLEMENT

1 I, Jacob McKeehan, declare as follows:

2 1. I have personal knowledge of the facts set forth herein and if called upon to testify,
3 I could and would do so competently under oath. I make this declaration, with the help of a
4 translator, in support of my Motion for Preliminary Approval of Class and PAGA Settlement.

5 2. I worked for Defendants as a non-exempt employee in the position of
6 Airport Services Concierge from about October 2021 to May 2022.

7 3. Based on my experience and knowledge of Defendants' wage and hour policies
8 and my familiarity with its employment practices, I worked with my attorneys to bring claims on
9 my own behalf as well as on behalf of other non-exempt employees of Defendants.

10 4. I am seeking to become a Class Representative in this case. I believe my
11 experiences are similar to Defendants' other non-exempt employees. I believe we were all subject
12 to the same employment policies and practices.

13 5. I do not have any conflicts with other non-exempt employees that would hinder my
14 ability to represent them. Therefore, I believe I will adequately represent Defendant's other non-
15 exempt employees.

16 6. My interests as a named plaintiff in this litigation are not adverse to the interest of
17 the other non-exempt employees. My interests are the same as the interests of the other non-exempt
18 employees because we were all subject to the same policies and practices and were similarly injured
19 by Defendants' company-wide policies and practices. I am seeking the same recovery on behalf of
20 myself and other non-exempt employees, which is to collect unpaid wages, meal period premiums,
21 rest period premiums, and penalties that are owed by Defendants.

22 7. I have always kept the best interests of the other non-exempt employees while
23 performing my duties as the named plaintiff in this action. I have been committed throughout the
24 course of this litigation to vigorously prosecuting this case on behalf of myself and the other non-
25 exempt employees. I believe that I have demonstrated my ability to advocate for the interests of the
26 other non-exempt employees by initiating this lawsuit, providing documents to my attorneys
27 pertaining to my employment with Defendants, keeping in regular contact with my attorneys
28

1 regarding the status of the lawsuit, providing my attorneys with any information needed to continue
2 to prosecute this action, and reviewing the settlement and its terms to make sure it was fair.

3 8. I will continue to actively participate in this lawsuit as necessary, and will continue
4 to make myself available to assist in this case in the future as needed.

5
6 I declare under penalty of perjury under the laws of the State of California that the foregoing
7 is true and correct and that this declaration was executed on July 31, 2025 in California.

8
9 
Jacob McKeehan (Jul 31, 2025 17:00:50 PDT)
10 Jacob McKeehan