

ATTORNEY OR PARTY WITHOUT ATTORNEY: STATE BAR NO.: NAME: Matthew C. Helland FIRM NAME: Nichols Kaster, LLP STREET ADDRESS: 235 Montgomery Street, Suite 810 CITY: San Francisco STATE: CA ZIP CODE: 94104 TELEPHONE NO.: (415) 277-7235 FAX NO.: (415) 277-7238 E-MAIL ADDRESS: helland@nka.com ATTORNEY FOR (name): Daniel Grentz, et al.		FOR COURT USE ONLY FILED Superior Court of California County of Los Angeles 11/25/2025 David W. Slayton, Executive Officer / Clerk of Court By: <u> M. Mata </u> Deputy	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: 312 North Spring Street MAILING ADDRESS: 312 North Spring Street CITY AND ZIP CODE: Los Angeles 90012 BRANCH NAME: Spring Street Courthouse		CASE NUMBER: 23STCV03941	
PLAINTIFF/PETITIONER: Daniel Grentz DEFENDANT/RESPONDENT: American Airlines, Inc. OTHER:		JUDICIAL OFFICER: Hon. Laura A. Seigle	
PROPOSED ORDER (COVER SHEET)		DEPT: 17	

NOTE: This cover sheet is to be used to electronically file and submit to the court a proposed order. The proposed order sent electronically to the court must be in PDF format and must be attached to this cover sheet. In addition, a version of the proposed order in an editable word-processing format must be sent to the court at the same time as this cover sheet and the attached proposed order in PDF format are filed.

1. Name of the party submitting the proposed order:
Daniel Grentz, et al.
2. Title of the proposed order:
[Proposed] Order and Judgment Granting Final Approval to Class Action and PAGA Settlement Agreement
3. The proceeding to which the proposed order relates is:
 - a. Description of proceeding: Final Fairness Hearing
 - b. Date and time: November 17, 2025, 9:00 A.M.
 - c. Place: Department 17, Spring Street Courthouse
4. The proposed order was served on the other parties in the case.

Matthew C. Helland

(TYPE OR PRINT NAME)

/s/Matthew C. Helland

(SIGNATURE OF PARTY OR ATTORNEY)

CASE NAME:

Daniel Grentz, et al.

23STCV03941

**PROOF OF ELECTRONIC SERVICE
PROPOSED ORDER**

1. I am at least 18 years old and **not a party to this action.**

a. My residence or business address is (*specify*):

4700 IDS Center, 80 South Eighth Street, Minneapolis, MN 55402

b. My electronic service address is (*specify*): spingree@nka.com

2. I electronically served the *Proposed Order (Cover Sheet)* with a proposed order in PDF format attached, and a proposed order in an editable word-processing format as follows:

a. On (*name of person served*) (*If the person served is an attorney, the party or parties represented should also be stated.*):

Molly Edgar, Esq., Adam KohSweeney, Esq., Kristin Macdonnell, Esq., attorneys for Defendant

b. To (*electronic service address of person served*): medgar@omm.com, akohsweeney@omm.com, kmacdonnell@omm.com

c. On (*date*): November, 20, 2025

☒ Electronic service of the *Proposed Order (Cover Sheet)* with the attached proposed order in PDF format and service of the proposed order in an editable word-processing format on additional persons are described in an attachment.

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

Date: November 20, 2025

Samuel Pingree

(TYPE OR PRINT NAME OF DECLARANT)



/s/Samuel Pingree

(SIGNATURE OF DECLARANT)

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Attorneys for Plaintiffs and the Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES**

DANIEL GRENTZ, individually, on behalf of
others similarly situated, and on behalf of other
aggrieved employees,

Plaintiffs,

v.

AMERICAN AIRLINES, INC.,

Defendant.

Case No.: 23STCV03941

Hon. Laura A. Seigle, Department 17
Spring Street Courthouse

**~~[PROPOSED]~~ ORDER AND JUDGMENT
GRANTING FINAL APPROVAL TO
CLASS ACTION AND PAGA
SETTLEMENT AGREEMENT**

Complaint Filed: February 22, 2023
Trial Date: Not Set

1 The Court has before it a motion by Plaintiff Daniel Grentz (“Plaintiff”) for Final
2 Approval of a proposed class action and Private Attorney General Act (“PAGA”) settlement.
3 The Court held a final fairness hearing on November 17, 2025. After reviewing the Plaintiff’s
4 motion, the declarations included therewith, hearing arguments of Counsel, and based on the full
5 record in this action, the Court hereby finds and orders as follows:

6 1. There have been no objections and there have been no opt outs. No class members
7 appeared at the final fairness hearing to address the Court.

8 2. Plaintiff has shown that the requirements of California Code of Civil Procedure
9 Section 382 are met. The Court therefore confirms its conditional certification of the following
10 class, for settlement purposes: “All persons employed by American as flight attendants based at a
11 California airport from January 1, 2024, until June 30, 2025.” The Court confirms its appointment
12 of Plaintiff Grentz as the class representative and its appointment of Plaintiff’s Counsel as Class
13 Counsel.

14 3. The Court confirms its preliminary finding that the proposed settlement is fair,
15 reasonable, and adequate, and worthy of approval both as to the Class and PAGA. Specifically,
16 the Court finds that the \$5,780,269.20 settlement amount is reasonable, and indeed is an excellent
17 result, in light of the risk, expense, complexity, and duration of further litigation, and given the
18 possible penalties at issue in the case.

19 4. The Court approves the \$75,000 PAGA allocation, of which 75%, or \$56,250, is to
20 be distributed to the California Labor Workforce and Development Agency (“LWDA”), and 25%,
21 or \$18,750, will be distributed to PAGA Employees. (The Court notes that the PAGA Notice in
22 this matter was sent on February 24, 2024, prior to June 19, 2024, and that the new 65%/35%
23 apportionment does not apply here.) The Court finds that the Parties have satisfied the
24 requirements of PAGA by submitting the Settlement Agreement to the LWDA.

25 5. The Court finds that the Parties followed the Court-approved notice plan. The
26 Court further finds that the notice plan constituted the best notice practicable under the
27 circumstances and constitutes valid, due, and sufficient notice to all Settlement Class Members.
28

1 The notice complies fully with the requirements of California Code of Civil Procedure § 382,
2 California Civil Code § 1781, California Rules of Court 3.766 and 3.769, the California and
3 United States Constitutions, and all other applicable law.

4 6. Accordingly, all Settlement Class Members and Aggrieved Employees were given
5 a full and fair opportunity to participate in these proceedings, and all Settlement Class Members
6 and Aggrieved Employees wishing to be heard have been heard. Settlement Class Members also
7 have had a full and fair opportunity to exclude themselves from the proposed settlement and the
8 class. Accordingly, the terms of the Settlement Stipulation and of this Order and Judgment shall
9 be forever binding on all Participating Class Members. These individuals have released and
10 forever discharged the Released Parties pursuant to Paragraph 5.2 and 5.4 of the settlement
11 stipulation. Further, all Non-Participating Class Members who are Aggrieved Employees, and
12 the State of California, have released and forever discharged the Released Parties pursuant to
13 Paragraph 5.3 and 5.4 of the Settlement Stipulation.

14 7. The Court grants Class Counsel's request for attorneys' fees in the amount of 27%
15 of the \$5,780,269.20 settlement, which amounts to \$1,560,672.68. The Court finds that the
16 amount is warranted in light of the excellent result and finds that reduction from the requested
17 27% is not warranted, despite the large lodestar multiplier cross-check.

18 8. The Court grants Class Counsel's request for reimbursement of \$9,857.35 in
19 litigation expenses.

20 9. The Court approves payment of \$15,755.00 to compensate the Settlement
21 Administrator.

22 10. The Court approves the Named Plaintiff Enhancement of \$7,500 to Plaintiff
23 Grentz, finding it warranted in light of the risks of litigating this case and the contributions to the
24 case.

25 11. The Court approves the Impact Fund as a cy pres recipient.

26 12. All capitalized terms used but not defined herein shall have the same definition as
27 set forth in the parties' Class Action and PAGA Settlement Agreement (the "Settlement
28

1 Stipulation”) filed with this Court.

2 13. The Settlement is HEREBY APPROVED in its entirety based upon the terms set
3 forth in this Order, the Court’s order granting preliminary approval, dated July 23, 2025, and the
4 Settlement Stipulation, and the releases encompassed therein are effectuated.

5 14. JUDGMENT IS HEREBY ENTERED, approving the terms of the Settlement.

6 15. Neither this Order nor the Settlement Stipulation, nor any of their terms or
7 provisions, nor any of the negotiations or proceedings connected with them, shall be construed
8 as an admission or concession by the Settling Parties of the truth of any of the allegations, claims,
9 defenses, or averments in this litigation, or of any liability, fault or wrongdoing of any kind.

10 16. The Parties shall comply with the terms of the Settlement Stipulation regarding
11 the funding of the settlement and the distribution of settlement funds to Class Members and Class
12 Counsel.

13 17. Plaintiff shall submit a copy of this Order and Judgment to the LWDA within 10
14 days after its entry.

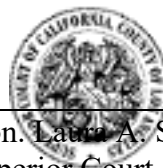
15 18. Class Counsel shall post notice of the final judgment on its website. That posting
16 shall constitute notice of the judgment to class members pursuant to Cal. Rules of Court, Rule
17 3.771(b).

18 19. Class Counsel shall file a declaration from the Settlement Administrator on or
19 before July 17, 2026 providing an accounting of the settlement distribution. Class Counsel shall
20 also file a proposed Amended Judgment at that time.

21 20. The Court sets a non-appearance hearing at 8:30 a.m. on July 24, 2026, in the
22 Spring Street Courthouse, Department 17. No appearance is necessary if Class Counsel has filed
23 the Settlement Administrator’s Declaration and proposed Amended Judgment.

24 **IT IS SO ORDERED.**

25 Dated: 11/25/2025



Laura A. Seigle

Hon. Laura A. Seigle
Superior Court of California,
County of Los Angeles
Laura A. Seigle / Judge