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Attorneys for Plaintiff Gregory Horowitz, on behalf of himself
and all others similarly situated and aggrieved

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO

GREGORY HOROWITZ, on behalf of
himself and all others similarly situated

Plaintiff,

v.

SKYWEST AIRLINES, INC., a Utah
Corporation; and DOES 1 Through 10,
inclusive,

Defendants.

Case No. 21-CV-04674-MMC

REPRESENTATIVE ACTION

**DECLARATION OF GREGORY
HOROWITZ IN SUPPORT OF
MOTION FOR APPROVAL OF
PRIVATE ATTORNEYS' GENERAL ACT
("PAGA") SETTLEMENT**

Date: April 26, 2024

Time: 9:00 a.m.

Ctrm: 7

Judge: Hon. Maxine M. Chesney

Complaint filed: March 22, 2021

Removal date: June 17, 2021

Trial date: Not set

1 I, Gregory Horowitz, declare as follows:

2 1. I am the named Plaintiff in this case. This Declaration is based on my personal
3 knowledge and if called to testify I could competently testify to the matters stated.

4 2. I reviewed and signed the proposed PAGA Settlement Agreement. Based on my
5 attorneys' evaluation and recommendation, and my involvement and the issues and risks
6 involved in this case, I believe the proposed settlement obtained on behalf of the Aggrieved
7 Employees is a good result.

8 3. I am not related to anyone associated with D.Law, Inc. or Cohelan Khoury &
9 Singer. I am not aware of any interests I have adverse to the the other Aggrieved Employees.

10 4. I worked for Defendant as a Pilot, based at Los Angeles International Airport,
11 from 2016 to August 2020. After my employment ended, I searched for attorneys to discuss my
12 work experiences and labor violations I believed I experienced. I retained D.Law, Inc. and
13 Cohelan Khoury & Singer to pursue a class and PAGA action.

14 5. In bringing this case, I understood a lot of work would be required of me and I
15 was willing to, and did, work to keep the case moving forward. I had many calls and exchanged
16 many emails with my attorneys, asking questions about the progress of the case, the meaning of
17 the developments, and responding to all questions they had about my employment.

18 6. I understood by representing a group of Aggrieved Employees and the State, and
19 not just myself, the case would take much longer, I would not receive as much, and would not
20 have a chance for a quick or private settlement.

21 7. I understood by filing this lawsuit against an employer I risked losing future
22 employment opportunities because an internet search would show I sued a past employer.

23 8. Despite these factors, I decided I would rather pursue a lawsuit with the potential
24 to address issues in addition to my own on behalf of others.

25 9. I provided information to my attorneys, and their staff, used to file a claim with
26 the State of California, which I understood was required before filing certain claims in court.

27 10. I provided additional information and responded to requests from my attorneys
28 as they drafted the lawsuit and I reviewed the lawsuit before it was filed.

13. I believe my thorough knowledge of Defendant's practices helped my attorneys to evaluate the claims and prepare for mediation. I made myself available the day of mediation to answer any questions my attorneys or the mediator had.

14. Following mediation, I reviewed and asked questions about the terms of the settlement, and after talking with my attorneys, signed a Memorandum of Understanding, and later reviewed and signed the Settlement Agreement.

15. I took my duties and responsibilities to the other employees seriously, worked with my attorneys, and did all that was asked of me.

16. Separate from this PAGA case for civil penalties, I believe I had independent claims for labor code violations. I agreed to settle all claims of any kind in exchange for a service payment of \$10,000 and signing a general release of all claims.

17. It is hard to determine exactly how much time I spent on this case over the past 35 months, but I'd estimate its over 50 hours, including time spent talking with my attorneys, responding to discovery, reviewing, editing, and signing declarations, preparing for and providing deposition testimony, and reviewing and signing the MOU and settlement agreement. I can say that all the time I spent on the case was time I could not spend with family or friends or on other personal activities.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed 3/19/2024 at Rosamond, California.

Gregory Horowitz
Gregory Horowitz