

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

LEE WARD, JAMES SAUNDERS, and  
WILLIAM HOLLOWAY, on behalf of  
themselves and all others similarly situated,

Plaintiffs,

v.

AMERICAN AIRLINES, INC.,

Defendant.

No. 4:20-cv-00371-O

**PLAINTIFFS' MOTION FOR CLASS CERTIFICATION**

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*Attorneys for Plaintiffs*

For the reasons set forth more fully in their accompanying Memorandum of Law and accompanying Appendix, incorporated here by reference, Plaintiffs Lee Ward, James Saunders, and William Holloway (“Plaintiffs”) hereby move this Court for an order certifying the following proposed Class in this action under Fed. R. Civ. P. 23(a), (b)(2), and (b)(3):

All persons in the United States who purchased tickets for travel on American Airlines flights scheduled to operate to, from, or within the United States from March 1, 2020 to the date of Class certification and who were not issued a refund for cancelled and/or significantly changed flights.

In addition, Plaintiffs also request that the Court designate Plaintiffs as class representatives and appoint Hagens Berman Sobol Shapiro LLP and Webb, Klase & Lemond, LLC as co-lead counsel for the Class, and Vaught Firm, LLC, as local counsel. Plaintiffs further request that the Court order the best notice that is practicable under the circumstances in accordance with Fed. R. Civ. 23(c)(2).

Dated: October 29, 2020

Respectfully submitted,

/s/ Daniel J. Kurowski

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**CERTIFICATE OF CONFERENCE**

Pursuant to Local Rule 7.1(b), on October 27, 2020, counsel for Plaintiffs Whitney K. Siehl and G. Franklin Lemond, Jr. telephonically conferred with counsel for American Airlines, Michael Bern and Dee Kelly regarding the foregoing Plaintiffs' Motion for Class Certification. American's counsel stated they were opposed to the filing of the relief requested in the Motion, and believe there are other pending motions dispositive to the claims.

/s/ Whitney K. Siehl

**CERTIFICATE OF SERVICE**

The undersigned, an attorney, hereby certifies that on October 29, 2020, a true and correct copy of the foregoing was filed electronically via CM/ECF, which caused notice to be sent to all counsel of record.

/s/ Daniel J. Kurowski