



Notice of Proposed Class Action Settlement *Authorized by the U.S. District Court*

You are receiving this notice because Southwest's records show that you took short-term military leave (i.e., 14 days or fewer) between October 10, 2004 and January 1, 2026.

There is a \$18,500,000 settlement available to eligible employees.

As part of a proposed class settlement, you are entitled to a payment of approximately \$[net amount]*

What you should do now:

1. Read this notice.
2. Decide whether to participate in the settlement.

Important things to know:

- If you take no action, you will be bound by the settlement, you will receive the approximate amount shown above, and your rights will be affected.
- The Settlement was preliminarily approved by the Court on [date], but the Court still needs to finally approve the settlement. Settlement payments will be made if the Court finally approves the settlement. Please be patient.
- You can learn more at: www.SWAuserrasettlement.com.

* If the amount here is \$0.00, see "What Do I Do Next?" below.

About This Notice

What is this case about?

A current Southwest employee filed a case, *Huntsman v. Southwest Airlines Co.*, claiming that Southwest has violated the Uniformed Services Employment and Reemployment Rights Act (USERRA) by not providing paid leave to employees who took short-term military leave (i.e., military leaves of 14 days or fewer) while paying employees for other allegedly comparable forms of leave, like jury duty, bereavement leave, or sick leave.

Southwest denies that it did anything wrong and disagrees that military leave is comparable to other forms of leave. The Court has not decided this case in favor of either side. Both sides settled the claims to avoid the risk and expense of litigation.

You can learn more at: www.SWAuserrasettlement.com.

Why did I get this notice?

Southwest's records show that you are likely part of the proposed settlement class. People are eligible to be part of the settlement if they are current or former employees of Southwest and, during their employment with Southwest at any time from October 10, 2004 through January 1, 2026, took short-term military leave from their employment with Southwest (i.e., military leave that lasted 14 days or fewer) and were subject to a collective bargaining agreement. Employees subject to the agreement between Southwest and Transport Workers Union Local 550 covering meteorologists are not part of this settlement class.

The Court authorized this notice to you because you have the right to know about a proposed class action settlement that affects your rights, and about all of your options, before the Court decides whether to finally approve the settlement. This notice explains the case, your legal rights, and what benefits are available.

What do I do next?

Read this notice to understand the settlement. Then, decide if you want to:

<p>DO NOTHING (OR SUBMIT A CLAIM) AND GET A PAYMENT</p>	<p>If the court grants final approval of the settlement, you will be sent a settlement check in the amount of approximately \$net of maximum possible fee award], and you will release claims against Southwest as described in this Notice.</p> <p>If the amount above is \$0.00, then you may have taken military leave during a period when Southwest no longer has military leave records for your workgroup. You need to complete the enclosed claim form to verify whether you took short-term military leave during one of those periods. If you submit the form, you will be credited with an amount based on the years in which you certify that you took leave. You will be bound by the settlement even if you do not submit a claim form.</p> <p>If you would prefer to receive your settlement payment electronically, you can choose to do so by visiting this website: www.SWAuserrasettlement.com</p>  <p>Scanning this QR code will also take you to the settlement website.</p> <p>If you do not make any payment selection on the settlement website, you will be sent your settlement payment via mailed check.</p>
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EXCLUDE YOURSELF ("OPT OUT")	You will receive no payment from this settlement and you will not release your claims against Southwest as described in this notice.
OBJECT	Tell the Court why you don't like the settlement (or any part such as attorneys' fees, expenses or the service awards) but remain a part of the settlement class and give up the ability to sue Southwest for released claims as described in this Notice.

Read on to understand the specifics of the settlement and what each choice would mean for you.

What are the most important deadlines?

Your deadline to object or opt out: **[date]**
Settlement approval hearing: **[date]**

About the Lawsuit

What does the settlement provide?

Without admitting any wrongdoing, Southwest has agreed to pay \$18,500,000 into a settlement fund. This money will be divided among members of the settlement class, after the following are deducted: (1) attorneys' fees; (2) expenses incurred in the lawsuit; (3) the cost of settlement administration; and (4) service awards for the two class representatives (Jayson Huntsman and David Cash). All of these amounts must first be approved by the Court. Class Counsel will not seek more than one third of the \$ 18,500,000 total settlement as fees. Class Counsel will not seek more than \$ 750,000 in expenses. The settlement administration expenses are expected to be \$ 17,500. Plaintiff intends to request a service award of no more than \$ 25,000 for each of the two class representatives.

Class Counsel will file motions asking the Court to grant attorneys' fees and service awards to the two class representatives. Once these motions are filed, you can view the motions on the settlement website, www.SWAuserrasettlement.com. These motions are due to be filed

and posted on the settlement website on [date]. You can object to either of these motions by objecting to the settlement and clarifying that you specifically object to the attorneys' fees and/or service award provisions in the settlement agreement. Please see the section below, "Object to the Settlement," for directions on how to object.

Your estimated share of the settlement, if you choose to participate, would be approximately \$[net of maximum possible fee award]. This amount may vary depending on what the Court approves as fees, expenses or service awards.

How is my payment calculated?

The amount of your payment depends on:

- The approximate wages you would have earned from Southwest during each period of leave, minus the approximate wages you earned from your military service.
- The Settlement Administrator will do the same calculation for other class members and then divide your amount by the total amount for all class members to calculate your portion of the total settlement amount.
- The Settlement Administrator will then multiply the result of this division by the remainder of the Settlement Amount after costs and attorneys' fees are removed. This determines your settlement payment.
- The Settlement Amount reflects a compromise of disputed claims. That means you will not be getting the full wages described in the first step above; you will be getting a proportional percentage of the Settlement Amount.

Based on the allocation formula that has been approved by the Court, you will receive a settlement payment of approximately \$[NET of maximum possible fee award], based on the above calculation.

One-half (1/2) of your settlement payment will be treated as wages and subject to withholdings and deductions (paid on a W2) and one-half (1/2) will be treated as non-wage compensation with no taxes withheld (paid on a 1099). Settlement payments made to Class

Members will not be subject to matching contributions or included as benefits-eligible earnings under any of Southwest's benefits plans, bonus programs, or compensation policies.

*The lawyers cannot advise you on taxes associated with this payment.
Please seek your own personal tax advice.*

Do I have a lawyer in this case?

In a class action settlement, the Court appoints lawyers to represent the class and its members. For this settlement, the Court has appointed the following lawyers:

Michael J. Scimone
Outten & Golden LLP
685 Third Avenue, 25th Floor
New York, New York 10017
Telephone: (212) 245-1000
SouthwestSettlement@outtengolden.com

R. Joseph Barton
THE BARTON FIRM LLP
1633 Connecticut Ave. N.W.
Suite 200
Washington, DC 20009
Telephone: (202) 734-7046
SouthwestUSERRA@thebartonfirm.com

Alina Pastor-Chermak
Outten & Golden LLP
1 California St., 12th Floor
San Francisco, CA 94111
Telephone: (415) 688-6174
SouthwestSettlement@outtengolden.com

These are the lawyers who represented the Plaintiff in the case and negotiated the settlement. The lawyers' fees will be paid from the settlement fund in an amount approved by the Court. **You will not have to pay the lawyers directly.** You do not need to retain your own lawyer, but you are free to do so at your own expense.

Are there more details about the settlement?

This notice summarizes the proposed settlement. More details are in the settlement agreement. To get a copy of the settlement agreement please visit:

www.SWAuserrasettlement.com

Or please scan the following QR code:



To get answers to your questions, contact the Settlement Administrator at makenna@ilymgroup.com (email) or (888) 250-6810 (phone) or Class Counsel at SouthwestSettlement@outtengolden.com (email) or (415) 638-4365 (phone).

You can also access the settlement agreement via the Court docket in this case, for a fee, through the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.cand.uscourts.gov>, or by visiting the office of the Clerk of the Court for the United States District Court for the Northern District of California, 450 Golden Gate Avenue, San Francisco, CA 94102 between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays.

What happens next in this case?

The Court will hold a fairness hearing to decide whether to finally approve the settlement. The hearing will be held at:

Where:

450 Golden Gate Avenue
Courtroom 8 – 19th Floor
San Francisco, CA 94102

When: [time] on [date].

Because a class action settlement decides the rights of all members of the proposed class, the Court must give final approval to the settlement before it can take effect. Payments will only be made if the Court grants final approval of the settlement.

You don't have to attend, but you may at your own expense. You may also ask the Court for permission to speak and express your opinion about the settlement. If the Court does not approve the settlement, it will be void and the case will continue. The date of the hearing may

change without further notice to members of the class. To learn more and confirm the hearing date, go to www.SWAuserrasettlement.com.

PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK'S OFFICE TO INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS.

Option 1: Do Nothing (or submit a claim), Get a Payment, and Release Claims

How do I participate in the settlement?

If you wish to participate in the settlement and receive payment, you do not need to take any action. If the Court grants final approval of the settlement, you will receive a settlement payment of approximately \$**[NET AMOUNT]** by mailed check or direct deposit.

If the amount above is \$0.00, then you may have taken military leave during a period when Southwest no longer has military leave records for your workgroup. You need to complete the enclosed claim form to verify whether you took short-term military leave during one of those periods. If you submit the form, you will be credited with an amount based on the years in which you certify that you took leave. You will be bound by the settlement even if you do not submit a claim form. If you would like to receive your payment electronically, you may elect to do so by going to this website to select your payment option: www.SWAuserrasettlement.com. The following QR code will also take you to the settlement website:



If you make no payment selection, you will receive your settlement payment via mailed check. If your mailing address has changed, please contact the Settlement Administrator or update your address

online at the same website.

What happens if I participate in the settlement?

If you do not opt out, you will release the Released Class Claims against Southwest and others (as defined in the settlement agreement). This means you cannot sue, continue to sue, or be part of any other legal action against Southwest that was or could have been pled based on the identical factual predicate in the Complaint, including any claim under USERRA Section 4316(b) for damages, prospective relief, or any other form of relief arising from or based on short-term military leave that you took from October 10, 2004 through January 1, 2026.

When will I receive the money?

At the Court's hearing on [date], the Court will decide whether to finally approve the settlement. This date may change without further notice to class members. Please check www.SWAuserrasettlement.com to confirm that the date has not changed.

If the Court grants final approval, and the approval order is not appealed, settlement checks and electronic payments are anticipated to be distributed approximately two months after the Court grants final approval. If you select the electronic payment option, you will receive your settlement check via direct deposit. If you select the option to be paid by mail or make no payment selection, you will be mailed your settlement check to your last known address. Please be patient and update the settlement administrator if your contact information changes.

Option 2: Exclude Yourself ("Opt Out")

What if I don't want to be part of this settlement?

You can opt out of the settlement.

If you opt out, you will not receive payment and cannot object to the

settlement. However, you will not be bound or affected by anything that happens in this case and may be able to file your own case. You will not release any claims.

How do I opt out?

To opt out of the settlement, you must submit an opt out statement to the settlement administrator by **[date]** at their address listed under “Key Resources” below.

You must include your name, address, telephone number, and a statement indicating your intent to opt out, such as “I opt out of the Southwest wage and hour settlement.”

Option 3: Object to the Settlement

What if I disagree with the settlement?

If you disagree with any part of the settlement but don’t want to opt out, you may object. You may also specifically object to Class Counsel’s request for attorneys’ fees or for service awards. These requests will be posted on the settlement website on **[date]**, after which time you can review the requests and make any objections before your objection deadline. You must give reasons why you think the Court should not approve the settlement and say whether your objection applies to just you, a part of the class, or the entire class. The Court will consider your views. The Court can only approve or deny the settlement — it cannot change the terms of the settlement — but it can modify the allocation of the settlement. You may, but don’t need to, hire your own lawyer to help you.

To object, you must send a letter to the Settlement Administrator that:

1. is postmarked by **[date]**;
2. includes the case name and number *Huntsman v. Southwest Airlines Co.*, Case No. 19-cv-00083-JSC
3. includes your full name, address and telephone number, and email address;

4. states the reasons for your objection;
5. says whether either you or your lawyer intend to appear at the final approval hearing and your lawyer's name; and
6. includes your signature.

Mail the letter to the settlement administrator as listed below under "Key Resources."

Key Resources

How do I get more information?

This notice summarizes the settlement approval. There are more details in the case documents. To get a copy of the case documents or get answers to your questions:

- contact the lawyers who represent the class (information below)
- visit the case website at www.SWAuserrasettlement.com.

Resource	Case Information
Case website	www.SWAuserrasettlement.com
Toll Free Number	(415) 638-4365
Settlement Administrator	Makenna Snow 2832 Walnut Ave. Ste C Tustin, CA 92780 (888) 250-6810
Class Counsel	Outten & Golden LLP (415) 638-4365 SouthwestSettlement@outtengolden.com The Barton Law Firm LLP (202) 734-7046 Telephone SouthwestUSERRA@thebartonfirm.com

Court (DO NOT CONTACT)	U.S. District Court for the Northern District of California 450 Golden Gate Ave San Francisco, CA 94102
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Subject: Southwest – Notice of Settlement

You are receiving this email because Southwest's records show that you are eligible to participate in a proposed settlement against Southwest. Additional information is contained in the attached Notice. To learn more about the settlement, or to elect electronic payment, please visit www.SWAuserrasettlement.com. For questions about the settlement, contact the Settlement Administrator by email at makenna@ilymgroup.com or by phone at (888) 250-6810 or Outten & Golden LLP by phone at (415) 638-4365 or by email at SouthwestSettlement@outtengolden.com and mention the Southwest Settlement.

You are receiving this text because Southwest's records show that you are eligible to participate in a proposed settlement against Southwest. To learn more about the settlement, or to elect electronic payment, please visit www.SWAuserrasettlement.com. For questions about the settlement, contact the Settlement Administrator by email at makenna@ilymgroup.com or by phone at (888) 250-6810 or Outten & Golden LLP by phone at (415) 638-4365 or by email at SouthwestSettlement@outtengolden.com and mention the Southwest Settlement.