

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

MARK WOODALL,
MICHAEL P. MCMAHON,
PAUL J. MADSON,
Individually and on behalf of a class of all
similarly situated persons,

Plaintiffs,

v.

AMERICAN AIRLINES, INC.,

Defendant.

Civil Action No. 3:06-CV-0072-M
ECF
Judge Barbara M.G. Lynn

**JOINT MOTION FOR CONDITIONAL CERTIFICATION OF THE
SETTLEMENT CLASS, PRELIMINARY APPROVAL OF THE SETTLEMENT
AGREEMENT, AND APPROVAL OF THE FORMS OF CLASS NOTICE**

Plaintiffs Mark Woodall, Michael P. McMahon, and Paul J. Madson (“Plaintiffs”), on behalf of themselves and the members of the putative class, along with Defendant American Airlines, Inc. (“Defendant”), by and through the undersigned attorneys, hereby jointly move the Court for an Order:

1. Conditionally certifying, for settlement purposes only, the Settlement Class and Settlement Sub-Classes pursuant to Rules 23(a) and 23(b)(2) of the Federal Rules of Civil Procedure;
2. Provisionally designating Plaintiffs Woodall, McMahon, and Madson as representatives of the Settlement Class;

3. Provisionally designating Plaintiffs Woodall and McMahon as representatives of the Vacation Accrual Sub-Class;

4. Provisionally designating Plaintiff Woodall as the representative for the Sick Leave Accrual Sub-Class;

5. Provisionally designating counsel for the representative Plaintiffs, Esther G. Lander, John P. Cunningham, and Andrew Braniff, Civil Rights Division of the U.S. Department of Justice, as counsel for the Settlement Class;

6. Preliminarily approving the Settlement Agreement;

7. Approving the Notice and Public Notice, and ordering the mailing and/or publication to Settlement Class Members in accordance with the Settlement Agreement; and

8. Scheduling a Fairness Hearing for purposes of determining whether, among other things, to finally certify the Settlement Class and Settlement Sub-Classes and finally approve the Settlement Agreement.

Plaintiffs' memorandum in support of this motion, as well as a proposed Order, are attached. Defendant will file a separate memorandum in support of this motion.

Dated: April 17, 2008

Respectfully submitted,

For Plaintiffs:

GRACE CHUNG BECKER
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Civil Rights Division

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/s/ Esther G. Lander

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CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of April 2008, I electronically submitted the foregoing **Joint Motion for Conditional Certification of the Settlement Class, Preliminary Approval of the Settlement Agreement, and Approval of the Forms of Class Notice, along with a Memorandum in Support, and an attached Settlement Agreement with Exhibits** with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case files system of the court. The electronic case files system sent a “Notice of Electronic Filing” to the following individuals, who have consented in writing to accept this Notice as service of this document by electronic means:

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