

L-3 Senior Pilot I USERRA Litigation

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT AND CLAIM FORM

Hall v. L-3 Communications Corp., 2:15-cv-00231-SAB (E.D. Wash.).

A federal court authorized this notice. This is not a solicitation from a lawyer.

If you were a National Guard or Reserve member of the Armed Forces who applied for a Senior Pilot I position at L3 Technologies, L-3 Communications Corporation, L-3 Vertex Aerospace or L-3 Communications Integrated Systems between January 1, 2011 and September 28, 2018, you could receive benefits under this class action settlement.

- A former member of the Air National Guard who applied to work for a Senior Pilot I position at L3 Technologies (f/k/a L-3 Communications Corporation), L-3 Vertex Aerospace, and/or L-3 Communications Integrated Systems (collectively “L-3”) has sued L-3 for rejecting his application for employment based on his then existing military obligations to and/or status in the Air National Guard.
- The Court has determined that the lawsuit can proceed as a class action on behalf of a group of persons who were National Guard or Reserve members of the Armed Forces when they applied to work for L-3 as a Senior Pilot I between January 1, 2011 and September 28, 2018, and were not hired as a Senior Pilot I by L-3 during that time period. A “Senior Pilot I” is a pilot position with one of L-3’s Intelligence Surveillance, and Reconnaissance (“ISR”) Programs flying King Air 350 planes outside the Continental United States in ISR missions. A Senior Pilot I may also be referred to as a “Pilot 3” position.
- Under the Settlement, you may be eligible to receive compensation if you are a member of the Class.
- The Court has preliminarily approved the Settlement. For the Settlement to become final and any payments or benefits to be distributed, the Court will need to issue a final approval order after a final approval hearing, which is currently scheduled for July 18, 2019 at 1:30 p.m. This date is subject to change without further notice. Please check www.L3USERRAClassAction.com for additional details about the Settlement. You may also get additional information by calling 1-866-742-4955 or by writing to the Settlement Administrator, as laid out in Section 10.

PLEASE READ THIS NOTICE CAREFULLY.

IF YOU ARE A MEMBER OF THE CLASS, THIS SETTLEMENT WILL AFFECT YOUR RIGHTS.

SUMMARY OF YOUR LEGAL RIGHTS & OPTIONS

SUBMIT A CLAIM FORM	OPTION #1: SUBMIT A CLAIM FORM TO RECEIVE SETTLEMENT BENEFITS. If you applied for a Senior Pilot I position at L-3 between January 1, 2011 and September 28, 2018, you may file a Claim Form. See Section 10 below for instructions for submitting a Claim Form. Based on the information in your Claim Form, you may receive a share of the Settlement Fund. A Claim Form must be submitted by any eligible Settlement Class Member to the Administrator in order to receive a payment under the Settlement Agreement.
DO NOTHING	OPTION #2: DO NOTHING. If you do nothing, you will <u>not</u> receive the benefits provided in the Settlement Agreement, regardless of whether you applied to work at L-3 as a Senior Pilot I. You also give up your right to sue L-3 on these claims.
EXCLUDE YOURSELF	OPTION #3: EXCLUDE YOURSELF/“OPT OUT.” If you wish to exclude yourself (“opt out”) from the Settlement you must follow the directions outlined in Section 12 below. If you exclude yourself, you will not receive payment and you cannot object to the Settlement. Your exclusion request must be postmarked no later than May 7, 2019.
OBJECT/ COMMENT	OPTION #4: OBJECT/COMMENT. You may write to the Court and explain why you do not like one or more aspects of the proposed Settlement. You must do so by no later than May 7, 2019.

If you have any questions after you have read this Notice, contact Class Counsel; PLEASE DO NOT CONTACT THE COURT as they will not be able to answer your questions.

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BASIC INFORMATION

1. Why did I receive this Notice?

You received this Notice because the Court has ordered that it be sent to the persons whom L3 Technologies, Inc. (formerly known as L-3 Communications Corporation), L-3 Vertex Aerospace LLC, and L-3 Communications Integrated Systems, L.P. (“L-3 CIS”) (collectively “L-3”) identified as potential Class Members in this litigation. L-3’s records show that you applied for a Senior Pilot I position at L-3 between January 1, 2011 and September 28, 2018.

This Notice informs you of a proposed settlement (referred to as “Settlement” or “Settlement Agreement”) of this class action consisting of \$2,000,000 that will be used to make payments to eligible Class Members, award attorneys’ fees and costs, and pay service awards to the Class Representatives approved by the Court (“the Settlement Fund”). This Notice describes your rights and options in connection with the Settlement.

2. What is this lawsuit about?

The lawsuit is a class action brought under the Uniformed Services Employment and Reemployment Act (“USERRA”) and the Washington Law Against Discrimination. The case is pending in the United States District Court for the Eastern District of Washington, *Hall v. L-3 Communications Corp.*, 2:15-cv-00231-SAB (E.D. Wash.). USERRA provides servicemembers a range of rights and benefits, including protections from discrimination based upon their military service and status, including their service and status in the National Guard or Reserves. The Defendants are L-3 Communications Corporation (now known as L3 Technologies, Inc.), L-3 Vertex Aerospace LLC, and L-3 Communications Integrated Systems, L.P. The Class Representative who filed the lawsuit, Nathan Kay, was a member of the National Guard when he applied for a Senior Pilot I position with L-3. He claims that L-3 rejected his Senior Pilot I application due to his military service or status in the National Guard, and that L-3 had a pattern or practice of similarly denying members of the National Guard and Reserves Senior Pilot I positions due to their military service or status. L-3 has denied the claims in this lawsuit.

Additional information about the claims and a copy of the Complaint are available at www.L3USERRAClassAction.com.

3. What has happened so far in the lawsuit?

On September 3, 2015, Plaintiff commenced this Litigation by filing a complaint alleging that L-3 violated USERRA and Washington state law by denying Plaintiff’s application for a Senior Pilot I position due to this service or status in the Washington Air National Guard. The original complaint alleged individual claims only. In early 2017, the Court allowed Plaintiff to amend the complaint to add claims on behalf of a class of similarly situated members of the National Guard and Reserves who applied for Senior Pilot I positions. On March 15, 2017, Plaintiff filed the Third Amended Complaint, which is now the operative complaint in this Litigation. From 2016 through 2018, the parties engaged in a process called discovery, under which the parties exchanged tens of thousands of pages of documents about L-3’s policies and practices, the applications of members of the National Guard and Reserves, and personnel information about applicants for Senior Pilot I positions, and the parties took depositions of key witnesses in this Litigation. The parties also engaged in expert discovery related to Plaintiff’s claims.

On January 22, 2018, Plaintiff and L-3 stipulated to stay the litigation to allow them to explore settlement of the lawsuit. The Court granted the stipulation to stay the case on January 26, 2018, and the case remained stayed through September 28, 2018. During the stay of the lawsuit, Plaintiff and L-3 engaged in additional informal discovery on issues related to liability, damages, and class certification. Numerous settlement conversations took place between the parties and their counsel. After a mediation on April 12, 2018, supervised by an experienced mediator, the parties reached an Agreement in Principle to resolve the lawsuit. Thereafter, the parties entered into a settlement agreement.

On January 25, 2019, the Court certified a Class as to all claims and appointed Plaintiff’s counsel as Class Counsel and Nathan Kay, Adam Richter, and Stephen Leary as the Class Representatives. The Court has not ruled on the merits of any claims or defenses. On January 25, 2019, the Court preliminarily approved the Settlement and has scheduled a final hearing to evaluate the fairness and adequacy of the Settlement.

THE CLASS

4. What is a Class Action?

A class action is a lawsuit in which the claims and rights of many people are decided in a single court proceeding. In a class action, one or more people, called Plaintiffs, file suit on behalf of others with similar claims, called the Class or Class Members. If a class is certified, the Court appoints a person, called the Class Representative, to represent and act on behalf of the class. Here, the Class Representatives are Nathan Kay, Adam Richter, and Stephen Leary.

5. Who is included in the Class?

The Class is defined as all persons who applied for a Senior Pilot I position with one or more of L-3's Intelligence, Surveillance, and Reconnaissance ("ISR") Programs between January 1, 2011 through September 28, 2018 ("Settlement Class Period"), who at the time of their applications were active or current Reservists, and were not hired by any Defendant in a Senior Pilot I position during the Settlement Class Period. "Senior Pilot I" means a pilot position with one of L-3's ISR Programs flying King Air 350 planes outside the Continental United States in ISR missions. A "Senior Pilot I" also may be referred to as a "Pilot 3" position. "Reservist" means a member of the reserve components of the United States Armed Forces, including the Army National Guard, Air National Guard, Army Reserve, Navy Reserve, Marine Corps Reserve, Air Force Reserve, or Coast Guard Reserve.

If you are included in the above definition and met the minimum qualifications for a Senior Pilot I position at the time of your application, **you must submit a timely and complete claim form to receive a payment from the Settlement Fund.** If you are unsure about whether you are a Class Member or met the minimum qualifications for a Senior Pilot I position, you can contact the lawyers representing the Class. The lawyers' contact information is listed in the response to Question 21.

THE SETTLEMENT

6. What does the Settlement provide?

The Settlement provides monetary relief to Class Members who were denied employment as a Senior Pilot I at L-3, and programmatic relief that will benefit reservists who apply to work at L-3 in the future and reservists who are employed by L-3.

The Settlement Agreement provides the following Monetary Relief and Programmatic Changes:

- **Monetary Relief.** The proposed Settlement creates a common fund of \$2,000,000 that will be used to (1) pay compensation to eligible Class Members; (2) pay attorneys' fees and costs; (3) pay service awards to the Class Representatives; and (4) pay any taxes owed, including for tax withholdings from the payments to eligible Class Members. After the payment of any attorneys' fees and costs, the service awards, taxes, the remaining Settlement Fund will be distributed to Class Members in equal shares.
- **Programmatic Relief.** L-3's division that presently employs pilots in ISR programs (L-3 CIS) will implement a range of actions in the future to ensure that a job applicant's military reserve obligations or status will not adversely affect his or her opportunity to be hired by L-3 CIS and to enhance L-3 CIS's policies for its employees who are reservists so that they can obtain the greatest opportunities at L-3 while meeting their reserve obligations. L-3 CIS will undertake the following actions to promote the rights and opportunities of members of the National Guard and Reserves, as well as additional actions described in the settlement agreement:
 1. L-3 CIS will create a policy on USERRA rights as either a standalone policy or within an appropriate Human Resources policy. The USERRA policy will address the military status and service of applicants and employees.
 2. L-3 CIS will not inquire into an applicant's military status or ask an applicant to disclose his military status before making a conditional offer of employment to the applicant.
 3. L-3 CIS will not require employees who go on rotations outside of the Continental United States ("rotators") to schedule their reserve military duty during their periods of rest and recuperation.
 4. L-3 CIS employees will not be required to give the company written notice of military leave before they take military leave. Oral notice will be sufficient.
 5. L-3 CIS will reform its scheduling policies to increase the amount of work that rotators can perform for L-3 CIS in conjunction with any military leave that they take, including accelerating the time period to return to work after military leave, allowing rotators to work shifts that are 45- days long (and in some cases shorter than 45 days) rather than missing a shift altogether if military leave will interfere with a portion of a rotation, and allowing rotators to work with the company's human resources department to adjust future rotations in light of the rotator's expected return from military leave.

6. L-3 CIS will train its Human Resources employees and designated L3 personnel regarding the CIS USERRA policy and its implementation.
7. L-3 CIS will conduct annual training on USERRA and other reservist-related issues for human resources and program staff who work with reservists regarding their military leave or who work on recruitment and hiring, and will modify equal employment opportunity training materials to refer to military service or status as protected classes.

7. What do I give up as a result of the Settlement?

If you are a Class Member and do not exclude yourself, in exchange for the payment, you will be required to release (or give up) any claims that you have or could have brought relating to not being hired by L-3 in a Senior Pilot I position during the Settlement Class Period due to your military service or status.

The full content of the release is set forth in the formal settlement agreement which is available at www.L3USERRAClassAction.com.

8. Why is there a Settlement?

In deciding to settle the lawsuit, the Class Representative and Class Counsel considered, among other things (a) the factual record; (b) the potential monetary recovery and the potential to change L-3's policies through litigation; (c) the strength of the Class' claims based on a review of the law and the facts established in discovery and through investigation; (d) the expense and length of continued proceedings, including possible trial and post-trial proceedings and appeals, necessary to prosecute the lawsuit; (e) the risks arising from the existence of unresolved questions of law and fact; (f) the nature and strength of defenses asserted by and available to L-3; and (g) the risks and uncertainties of continued USERRA class action litigation of this nature. After a thorough review and investigation, the Class Representatives and Class Counsel believe that in light of the foregoing considerations, the proposed Settlement is fair, reasonable and adequate and in the best interests of the Class.

9. How do I receive a payment under the Settlement and what will I receive?

In order to receive a payment under the settlement, you must submit a timely and completed Claim Form demonstrating that you are a member of the Class and that you met the minimum qualifications for a Senior Pilot I position at the time of your application. All eligible Class Members who submit a timely and completed Claim Form that demonstrates their membership in the Class and that they met the minimum qualifications for a Senior Pilot I position at the time of application will receive an equal pro rata share of the net settlement fund (the net settlement fund is the \$2 million settlement fund minus the payment of any attorneys' fees and costs, the service awards, and a portion of taxes). The amount that each eligible Class Member will receive will be determined by the number of Class Members who submit a timely and completed Claim Form that demonstrates their membership in the Class and eligibility to receive payment.

The Claim Form that you must submit to receive a payment is included in the Notice Packet that you have received and is available on the Settlement Administrator's web site at www.L3USERRAClassAction.com.

If you do not submit a timely and completed Claim Form, you will not receive any payment under the Settlement.

10. How do I complete the Claim Form to receive a settlement payment?

To receive a payment under the Settlement, you must submit a completed Claim Form by May 7, 2019.

In the Claim Form, you must make statements and provide documentation to show (1) that you applied for a Senior Pilot I position at L-3 during the Settlement Class Period (January 1, 2001 to September 28, 2018), (2) you were a current Reservist at the time of the application for Senior Pilot I during the Settlement Class Period, and (3) you were qualified for the Senior Pilot I position.

To be qualified for the Senior Pilot I position, you needed to have at least 2,000 hours of total documented flight time and 500 hours of fixed wing multi-engine flight time at the time of the application. But if you had less than 2,000 hours of total documented flight time, you would be considered qualified, for the purpose of this Settlement, if you had (1) experience flying ISR missions; (2) experience flying a King Air aircraft; or (3) 1,500 or more total hours, if you applied between March 1, 2016 and March 14, 2017.

In order to show that you meet the standards to be a Class Member, in the Claim Form you must do the following:

- (1) You must state in the Claim Form the general time frame in which you applied for a Senior Pilot I position during the Settlement Class Period. If L-3's records do not confirm that application, you will be given an opportunity to provide documentary evidence to show when you applied.
- (2) You must state in the Claim Form the National Guard or Reserve unit that you belonged to when you applied for a Senior Pilot position during the Settlement Class Period. You must also provide documentary evidence of your membership in that National Guard or Reserve unit at that time. Such documentary evidence includes a DD-214 Form or any other official document from the United States Armed Forces that states or indicates that you were an active or current member of the relevant National Guard or Reserve unit at the time of the Senior Pilot I application.
- (3) You must state in the Claim Form how many total flight hours and how many hours of fixed wing multi-engine time you had at the time of your application for a Senior Pilot I position, and provide documentary evidence of your relevant flight hours.

Most Class Members will need to provide documentary evidence that they had 2,000 flight hours at the time they applied. However, if your flight hours were below 2,000 total hours at the time of your application, you must state in the Claim Form that you had (1) experience flying ISR missions; (2) experience flying King Air aircraft; or (3) more than 1,500 total flight hours, if he or she applied between March 1, 2016 and March 14, 2017, and you must provide documentary evidence supporting such experience.

Documentary evidence includes a previously-prepared resume or flight log that states your relevant flight hours, aircraft flown, or that shows ISR experience. If the resume or flight log was not dated, you may identify on the document the date or timeframe in which the resume was current.

11. Will I have to pay taxes on the amount that I receive?

Your payment will be allocated as a wage payment and reported on a W-2. The relevant income taxes and/or payroll taxes owed by an employee will be withheld by the Settlement Administrator from your Settlement payment and transmitted to federal, state, and/or local tax authorities. The employer's share of any payroll taxes that are owed with respect to your Settlement payment will be paid separately by L-3 (separate from and in addition to the \$2 million Settlement Fund) and transmitted to federal, state, and/or local tax authorities by the Settlement Administrator.

EXCLUSION & OBJECTIONS

12. If I want to get out of the settlement, what should I do?

If you are a Class Member and you wish to exclude yourself from the Settlement, you must send a letter to the Settlement Administrator that includes the following:

- Your name, address, and telephone number;
- A statement that you want to be excluded from *Hall v. L-3 Commc'ns Corp.*, 2:15-cv-00231-SAB (E.D. Wash.); and
- Your signature.

You must mail your exclusion request, postmarked no later than May 7, 2019, to:

Hall v. L-3 Settlement Administrator
RG/2 Claims Administration, LLC
P.O. Box 59479
Philadelphia, PA 19102-9479

If you ask to be excluded you will not receive a settlement payment, and you cannot object to the Settlement, but you will be able to separately sue L-3. If you wish to exclude yourself in order to file an individual lawsuit against L-3, you should speak to a lawyer as soon as possible because your claims could be subject to a timeliness defense.

13. If I do not exclude myself, can I sue Defendant for the same thing later?

No. Under the release in the Settlement Agreement, if you do not exclude yourself, you will release your claims, causes of action, or requests for relief relating to not being hired by L-3 in a Senior Pilot I position during the Settlement Class Period based on your military service or status. If you have a pending lawsuit, speak to your lawyer in that lawsuit immediately.

14. If I exclude myself, can I still get a payment under the Settlement?

No. If you are a Class Member you exclude yourself from the Settlement, you will not receive any payment under the Settlement.

15. How do I tell the Court what I think about the Settlement?

You can tell the Court that you object to the Settlement if you do not agree with any aspect of the Settlement. To object, you must send a letter or other written statement to the Court saying that you object to the Settlement or a specific aspect of it. Include your name, address, telephone number, signature, the title of the case, *Hall v. L-3 Commc'ns Corp.*, 2:15-cv-00231-SAB (E.D. Wash.),

and an explanation of all reasons you object to the Settlement. Please be advised that failure to include these details may result in the Court refusing to consider your objection.

Your written objection must be filed or postmarked no later than May 7, 2019, and either (1) mailed to the Office of the Clerk of Court, United States District Court for the Eastern District of Washington, Thomas S. Foley United States Courthouse, 920 West Riverside Ave, Room 840, Spokane, WA 99201, or (2) filed in person at any location of the United States District Court for the Eastern District of Washington.

Your objection should state the supporting bases and reasons for the objection, identify any and all witnesses, documents or other evidence you would like to present at the Final Approval Hearing, and describe the substance of any testimony provided by you or other witnesses.

IF YOU DO NOT OBJECT IN THE MANNER DESCRIBED IN THIS NOTICE, THE COURT MAY CONCLUDE THAT YOU HAVE WAIVED ANY OBJECTION AND MAY NOT PERMIT YOU TO SPEAK AT THE FAIRNESS HEARING.

16. What's the difference between objecting and being excluded?

Objecting is simply telling the Court that you do not like or disagree with an aspect of the Settlement. You can object to the Settlement only if you do not exclude yourself from the Settlement. Excluding yourself from the Settlement is telling the Court that you do not want to be part of the Settlement. If you exclude yourself from the Settlement, you cannot object to the Settlement because you will not be bound by the Settlement.

THE FINAL APPROVAL HEARING

17. When and where will the Court hold the hearing?

The Final Approval Hearing (also called the "Fairness Hearing") will take place before the Honorable Stanley A. Bastian in Courtroom 755, United States District Court for the Eastern District of Washington, Thomas S. Foley United States Courthouse, 920 West Riverside Ave., Spokane, WA 99201, at 1:30 p.m., on July 18, 2019. The hearing may be moved to a different date or time without additional notice, so it is a good idea to check www.L3USERRAClassAction.com for updates. At the hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate, how much to pay Class Counsel in fees, what to reimburse Class Counsel for their expenses, and whether to provide Plaintiff with a service award because of his time and expense to bring this lawsuit. If there are objections or comments, the Court will consider them at the hearing. After the hearing, the Court will decide whether to approve the Settlement and enter Final Judgment. We do not know how long these decisions will take. Please be patient.

18. Do I have to come to the Final Approval Hearing?

Your attendance is not required, even if you submit a written response. Class Counsel will answer questions the Court may have at the Final Approval Hearing, including any questions about objections. If you or your personal attorney wants to attend the hearing, you may attend at your own expense. As long as any objection or comment you filed was postmarked by the deadline, the Court will consider it even if you do not attend the Final Approval Hearing.

19. May I speak at the Final Approval Hearing?

Yes. You may speak at the Final Approval Hearing, so long as you are a member of the Class and have properly and timely submitted a written response as set forth above and have stated in your response your intention to appear at the Final Approval Hearing.

Contact L3Settlement@outtengolden.com

20. What happens if I do nothing at all?

If you do nothing you will NOT receive the benefits and you also give up your right to sue L-3 on these claims.

THE LAWYERS REPRESENTING YOU

21. Do I have a lawyer in this case?

Yes. The Court has appointed the following law firms to serve as the attorneys for the Class:

<i>Lead Class Counsel</i>	<i>Additional Class Counsel</i>
<p>OUTTEN & GOLDEN LLP Peter Romer-Friedman 601 Massachusetts Avenue NW, Second Floor West Suite Washington, D.C. 20001 Telephone: (202) 847-4400 L3Settlement@outtengolden.com</p> <p>Nina Martinez 685 Third Avenue, 25th Floor New York, NY 10017 Telephone: (212) 245-1000 Facsimile: (415) 638-8810 L3Settlement@outtengolden.com</p>	<p>CROTTY & SON LAW FIRM, PLLC Matthew Z. Crotty, Esq. 905 W. Riverside Ave., Suite 404 Spokane, WA 99201 Telephone: (509) 850-7011 matt@crottyandson.com</p> <p>LAW OFFICE OF THOMAS G. JARRARD LLC Thomas G. Jarrard, Esq. 1020 N. Washington Dt. Spokane, WA 99201 Telephone: (425) 239-7290 tjarrard@att.net</p>

The Court has approved these law firms to serve as Class Counsel. You have the right to hire your own attorney (at your own expense), but if you remain in the Class, you are not required to hire a separate attorney.

22. How will the lawyers for the Class be paid?

Class Counsel undertook this matter more than a three years ago, following an investigation, on a wholly contingent basis. Subject to approval of the Court, Class Counsel is permitted to seek an award of attorneys’ fees to be paid from the Settlement Fund, and reimbursement of its expenses incurred during the litigation. These attorneys’ fees pay for work the attorneys have performed on behalf of the Class and for work yet to be done in helping to administer the Settlement. Before the Final Approval Hearing, Class Counsel will seek the Court’s approval of an award of attorneys’ fees and reimbursement of costs in the amount not to exceed \$650,000 of the \$2,000,000 Settlement Fund. Whether the Settlement is approved or not, you will not be required to directly pay any attorneys’ fees or other expenses or costs, which will be paid only from the Settlement Fund in the amount approved by the Court.

THE SETTLEMENT IS NOT YET FINAL

23. Can the Settlement be terminated?

If there is no final Court approval of the proposed Settlement, or if Class Counsel or Defendant withdraws from the Settlement in accordance with the terms of the Settlement Agreement, or if the Settlement is not consummated for any other reason, the Settlement Agreement will become null and void, and the parties will resume their former positions in the lawsuit.

GETTING MORE INFORMATION

24. How do I get more information?

This Notice contains only a summary of the proposed Settlement and the rights of eligible Class Members. Full details of the Settlement are set forth in the Settlement Agreement. The Settlement Agreement and certain other documents about the litigation are available on the Settlement Administrator's website at www.L3USERRAClassAction.com. You may obtain additional information regarding the matters involved in this lawsuit by reviewing the papers on file in this litigation, which may be (a) inspected, during business hours, at the Office of the Clerk of Court, United States District Court for the Eastern District of Washington, Thomas S. Foley United States Courthouse, 920 West Riverside Ave, Room 840, Spokane, WA 99201, or (b) accessed online for a fee by obtaining a password at www.pacer.gov.

Please do not contact the Court or L-3 about this Settlement. They will not be able to give you additional information.

25. How do I ensure that I receive any updates?

If your contact information changes after you receive this Notice, you should contact the Settlement Administrator. You may e-mail any updates to your contact information to Class Counsel.

26. Whom do I call about questions?

PLEASE DO NOT CONTACT THE COURT OR THE COURT CLERK'S OFFICE REGARDING THIS NOTICE, THE SETTLEMENT, OR THE CLAIMS PROCESS.

If you have any questions about this Notice, or the lawsuit, you may contact Class Counsel or the Settlement Administrator listed below.

<i>Lead Class Counsel</i>	<i>Additional Class Counsel</i>
<p>OUTTEN & GOLDEN LLP Peter Romer-Friedman 601 Massachusetts Avenue NW, Second Floor West Suite Washington, D.C. 20001 Telephone: (202) 847-4400 Facsimile: (202) 847-4410 Email: L3Settlement@outtengolden.com</p> <p>Nina Martinez 685 Third Avenue, 25th Floor New York, NY 10017 Telephone: (212) 245-1000 Facsimile: (415) 638-8810 Email: L3Settlement@outtengolden.com</p>	<p>CROTTY & SON LAW FIRM, PLLC Matthew Z. Crotty, Esq. 905 W. Riverside Ave., Suite 404 Spokane, WA 99201 Telephone: (509) 850-7011 matt@crottyandson.com</p> <p>LAW OFFICE OF THOMAS G. JARRARD LLC Thomas G. Jarrard, Esq. 1020 N. Washington Dt. Spokane, WA 99201 Telephone: (425) 239-7290 tjarrard@att.net</p> <p>Hall v. L-3 Settlement Administrator RG/2 Claims Administration, LLC P.O. Box 59479 Philadelphia, PA 19102-9479</p>

Dated: February 15, 2019

BY ORDER OF THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF WASHINGTON

Total fixed wing multi-engine _____ (500 hours of fixed wing multi-engine flight time were required)

If your total flight hours were below 2,000 total hours at the time of your application, then describe:

(1) your experience flying ISR missions prior to your application

_____;

(2) your experience flying a King Air aircraft prior to your application

_____;

(3) how your total flight hours were 1,500 or greater, if you applied between March 1, 2016 and March 14, 2017

_____;

Please attach the following documentation to your Claim Form

1. **Provide documentary evidence of your membership in that National Guard or Reserve unit at that time you applied for a Senior Pilot I position.** Such documentary evidence includes a DD-214 Form or any other official document from the United States Armed Forces that states or indicates that you were an active or current member of the relevant National Guard or Reserve unit at the time of the Senior Pilot I application.
2. **If you had 2,000 or more total flight hours and 500 or more fixed wing multi-engine hours at the time you applied for a Senior Pilot I position, then provide documentary evidence of those flight hours.** Documentary evidence includes a previously-prepared resume or flight log that states your relevant flight hours, aircraft flown, or that shows ISR experience. If the resume or flight log was not dated, you may identify on the document the date or timeframe in which the resume was current.
3. **If you did not have 2,000 or more total flight hours at the time you applied for a Senior Pilot I position, you must provide different documentary evidence:** (1) documentary evidence of 1,500 or more total flight hours and 500 or more fixed wing multi-engine hours if you applied between March 1, 2016 and March 14, 2017; or (2) documentary evidence of experience flying ISR missions and 500 or more fixed wing multi-engine hours; or (3) documentary evidence of experience flying King Air aircraft and 500 or more fixed wing multi-engine hours.

IN ORDER TO RECEIVE A RECOVERY IN THIS ACTION, YOU MUST COMPLETE, SIGN AND MAIL THIS CLAIM FORM AND ALL DOCUMENTARY EVIDENCE BY FIRST CLASS U.S. MAIL OR EQUIVALENT, POSTAGE PAID, POSTMARKED ON OR BEFORE MAY 7, 2019 ADDRESSED AS FOLLOWS:

Hall v. L-3 Settlement Administrator
RG/2 Claims Administration, LLC
P.O. Box 59479
Philadelphia, PA 19102-9479

I understand that I may be asked to provide additional documentary evidence to establish my eligibility in this class. I have reviewed the Class Notice and this form and I consent to join in this USERRA action. I understand that the Named Plaintiff and his counsel represent me in this action. I declare under penalty of perjury that the foregoing is true and correct.

X _____
(sign your name here)

Date