

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS**

DAMONIE EARL, LINDA RUGG, ALESA BECK, TIMOTHY BLAKEY, JR., STEPHANIE BLAKEY, MARISA THOMPSON, MUHAMMAD MUDDASIR KHAN, ELIZABETH COOPER, JOHN ROGERS, VALERIE MORTZ-ROGERS, and LAKESHA GOGGINS, each individually and on behalf of all others similarly situated,

Plaintiffs,

v.

THE BOEING COMPANY and
SOUTHWEST AIRLINES CO.,

Defendants.

Civil Action No. 4:19-cv-00507

RESPONSE TO DEFENDANTS' MOTION TO SHOW AUTHORITY TO ACT

Defendants have "move[d] the Court to require Messrs. Hecht and Lorin to demonstrate that they have authority to act on behalf of Pierce Bainbridge or Plaintiffs in this matter." Dkt. 127 at 2. The motion should be denied as moot.

On June 11, 2020, Hecht Partners LLP ("HP") submitted a Sur-Reply To Bathae Dunne's Motion To Designate Interim Lead in which HP set forth that it was appearing "as successor to Pierce Bainbridge Beck Price & Hecht LLP ("PB") in connection with this action, and as counsel to plaintiffs Stephanie Blakey, Timothy Blakey Jr., Lakesha Goggins, Damonie Earl, Alesa Beck, Marisa Thompson, John Rogers, [and] Valerie Mortz-Rogers" Dkt. 136 at 1. On June 19, 2020, HP produced to all counsel its engagement agreements with the foregoing plaintiffs ("Plaintiffs"). Accordingly, HP and Messrs. Hecht and Lorin have demonstrated their authority to act on behalf of Plaintiffs.

In addition, on June 10, 2020, PB filed the Declaration of Camille Varlack in Support of PB's Supplemental Response to Andrew Williamson's Ex Parte Submission, dated June 8, 2020, in which Ms. Varlack, the Chief Operating Officer ("COO") of PB, declared that Messrs. Hecht and Lorin remain at PB. Dkt. 134 at Pars. 4-6. For the avoidance of any doubt, John Pierce, PB's Managing Partner, has submitted herewith an additional declaration confirming that Messrs. Hecht and Lorin remain of counsel at, and are authorized to act on behalf of, PB in connection with this matter. *See* Declaration of John M. Pierce. Accordingly, Messrs. Hecht and Lorin have demonstrated that they have authority to act on behalf of PB and its clients in this matter.

In light of the foregoing, the motion should be denied as moot.

Dated June 22, 2020

/s/ Andrew J. Lorin
Andrew J. Lorin
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served on all counsel of record through the Court's EM/ECF electronic filing system on June 22, 2020.

/s/ Andrew J. Lorin
Andrew J. Lorin

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DECLARATION OF JOHN M. PIERCE

I, John M. Pierce, hereby declares, under penalty of perjury, as follows:


1. I am the Managing Partner of Pierce Bainbridge Beck Price & Hecht LLP¹ (“PB”).

I am over 21 years of age and am not a party to this action. I make this declaration based upon my personal knowledge of the facts asserted herein, and if called to testify, I could and would testify competently thereto. I submit this declaration in support of Hecht Partners LLP’s Response to Defendants’ Motion to Show Authority.

¹ The firm is in the process of changing its name to remove, *inter alia*., “Hecht” as David L. Hecht is no longer a partner.

2. David L. Hecht and Andrew J. Lorin remain as of counsel to PB in connection with the above captioned matter and are authorized by PB to act on PB's behalf in connection with this matter.

Dated June 22, 2020



John M. Pierce