



United States District Court

Fredericks v. Ameriflight, LLC

Case No. 3:23-cv-01757-X

Class Action Notice

Authorized by the U.S. District Court

Did you fly for Ameriflight under a Beechcraft 99 training repayment agreement between January 30, 2019, and the present?

There is a class action lawsuit and you may be a class member.

If you want to be part of the class action, you do not need to do anything.

If you do not want to be part of it, you need to request exclusion by February 28, 2025.

Important things to know:

- If you take no action, you will be a part of the class, you will be bound by the outcome of the case, and your rights will be affected. You will not need to actively participate in the lawsuit. If there is any money from a court-ordered judgment or settlement, you may be entitled to money.
- You can learn more at: www.AmeriflightLawsuit.com.

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About This Notice

Why did I get this notice?

This notice is to tell you about a class action lawsuit, *Fredericks v. Ameriflight, LLC*, brought on behalf of pilots who worked for Ameriflight under a training repayment agreement. **You received this notice because you may be a member of the group of people affected, called the “class.”**

You may be familiar with the concept of a “class action.” In many class actions, individuals are bound by the results of the lawsuit, unless they request exclusion. In other words, if individuals do nothing, they are bound by the outcome of the lawsuit, whether it results in money for them or not. This is true of the class in this case.

Read this notice to understand the case and to determine if you are a class member. Then, decide if you want to stay in the case or request exclusion from the class. If you have questions or need assistance, please go to www.AmeriflightLawsuit.com.

What is the deadline to request exclusion?

The deadline to request exclusion from the class is February 28, 2025.

Who is in the class?

This is the definition of the class that the court approved:

Pilots with a Beechcraft 99 repayment agreement who left employment with Ameriflight before the term of the repayment plan was complete.

The Penalty Class only includes pilots who completed training, and were under the Beechcraft 99 training repayment agreement between January 30, 2019, and the present. Pilots who signed repayment agreements for aircraft other than the Beechcraft 99 are not included in the class.

Do I have a lawyer in this lawsuit?

In a class action, the court appoints the class representative and lawyers to work on the case and represent the interests of all the class members. For this case, the Court has appointed the following lawyers:

Your Lawyers:

Rachel Dempsey, TOWARDS JUSTICE

Persis Yu, STUDENT BORROWER PROTECTION CENTER

Ashley Tremain, TREMAIN ARTAZA PLLC

Rachel Smit, FAIR WORK, P.C.

These are the lawyers who will represent you as a member of the class. **You will not be charged for their services**, although their fees may be paid with the court's approval from any settlement that they negotiate for the class.

If you want to be represented by your own lawyer, you may hire one at your own expense.

Learning About the Lawsuit

What is this lawsuit about?

Kathleen Fredericks is a former Ameriflight pilot who filed a lawsuit on behalf of herself and other Ameriflight pilots in January 2023, claiming that Ameriflight's training repayment agreement violated federal and state law. The claim that affects you, as a class member, is Fredericks' claim that the repayment amount under the Beechcraft 99 training repayment agreement is a penalty (the "penalty claim"), that violates Texas law and should not be enforced by any court.

Fredericks seeks to recover any amounts that class members have paid to Ameriflight or any collections agencies. Fredericks also seeks an order from the Court that the training repayment agreement is unlawful and unenforceable.

Ameriflight does not agree that the repayment amount is a penalty, and denies that it did anything wrong. Ameriflight contends that the repayment amount is a reasonable estimate of the cost of the training it provided to Fredericks and the other class members.

Where can I learn more?

You can get a complete copy of the key documents in this lawsuit by visiting:
www.AmeriflightLawsuit.com

The Court has denied Ameriflight's motion to dismiss the penalty claim from the case, but the Court has not yet decided whether the repayment amount is a penalty that violates Texas law.

On November 25, 2024, the Court ruled that the penalty claim can proceed as a class action, **but only with respect to pilots who were trained on the Beechcraft 99**. This means that Fredericks and her lawyers are able to represent the interests of class members, like you, as the case proceeds without you having to actively participate in the lawsuit.

The Court has authorized this notice to inform you of your right to exclude yourself from this lawsuit. Nothing in this notice is intended as an expression of the Court's opinion about the merits of Fredericks' claims or Ameriflight's defenses, or about whether you should request exclusion from this lawsuit.

What happens next in this lawsuit?

The lawyers will continue to pursue legal action and prepare the case for trial, unless the two sides decide to settle the case.

Deciding What To Do

What are my options?

You have two options. You can do nothing and stay in the case, or you can request exclusion from the class.

Doing Nothing and Staying in the Case

What happens if I do nothing?

If you do nothing, you will be part of the case, and your rights will be affected by the outcome of the penalty claim in this lawsuit. You won't be able to start, continue, or be part of any other lawsuit against Ameriflight that claims the repayment amount is a penalty under Texas law.

If Fredericks wins or settles this claim, class members may be entitled to money. If Ameriflight wins, class members will receive nothing.

Requesting Exclusion

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

You can request exclusion from the class.

How do I request exclusion?

If you wish to be excluded from the class, you must send a request to be excluded from the class to the Case Administrator. To be effective, the request for exclusion must include: (i) your full name, address, email address, and telephone number; (ii) a statement that you request to be excluded from the class and understand that you will not be eligible to recover any money as part of any court-ordered judgment or settlement; and (iii) your signature and the date.

Requests for exclusion must be sent to the Case Administrator by mail or email, and must be submitted or postmarked by February 28, 2025.

Fredericks v Ameriflight
c/o Atticus Administration
PO Box 64053
St. Paul, MN 55164
AmeriflightLawsuit@atticusadmin.com

Be sure to include your name, address, telephone number, and signature.

If you exclude yourself from the class, you will not receive any money if there is a court-ordered judgment or settlement in the case.

Key Resources

How do I get more information?

This notice summarizes the court's decision to allow this case to proceed as a class action. There are more details in the case documents. To get a copy of the case documents or get answers to your questions:

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

Resource	Case Information
Case website	www.AmeriflightLawsuit.com
Phone #	1 (857) 800-0440
Your Lawyers	<p>Rachel Dempsey TOWARDS JUSTICE 1580 N Logan Street Ste 660 PMB 44465 Denver, CO, 80203-1994 rachel@towardsjustice.org</p> <p>Persis Yu STUDENT BORROWER PROTECTION CENTER (a fiscally sponsored project of Shared Ascent Fund) 1025 Connecticut Ave NW, #717 Washington, DC 20036 persis@protectborrowers.org</p> <p>Ashley Tremain TREMAIN ARTAZA PLLC 6060 N. Ctrl. Expwy., Suite 567 Dallas TX 75206 ashley@tremainartaza.com</p> <p>Rachel Smit FAIR WORK, P.C. 192 South St. Suite 450 Boston, MA 02111, USA rachel@fairworklaw.com</p>