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10 *Airlines Holdings, Inc., and United Airlines Holdings'*
Administrative Committee

11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
13 **SAN FRANCISCO DIVISION**

15 KEVIN E. BYBEE, JOHN R. SCHOLZ,
16 VICTOR H. DRUMHELLER, and SALLY A.
DILL, as individuals and plan participants in
17 The Continental Retirement Plan, on behalf of
themselves and all others similarly situated, and
18 on behalf of The Continental Retirement Plan,

19 Plaintiffs,

20 v.

21 INTERNATIONAL BROTHERHOOD OF
TEAMSTERS, a labor organization, *et al.*,

22 Defendants.

Case No. 3:18-cv-06632-JD

**DECLARATION OF CHRIS A.
HOLLINGER IN SUPPORT OF
DEFENDANTS UNITED AIRLINES,
INC., UNITED AIRLINES HOLDINGS,
INC., AND UNITED AIRLINES
HOLDINGS' ADMINISTRATIVE
COMMITTEE'S MOTION TO DISMISS
PLAINTIFFS' SECOND AMENDED
COMPLAINT UNDER RULE 12(B)(1)
AND/OR RULE 12(B)(6) OF THE
FEDERAL RULES OF CIVIL
PROCEDURE**

Hearing Date: February 4, 2021
Time: 10:00 a.m.
Place: Courtroom 11, 19th Fl.
Judge: Hon. James Donato

1 I, CHRIS A. HOLLINGER, declare and state as follows:

2 1. I am a partner with the law firm of O’Melveny & Myers LLP, counsel for
3 Defendants United Airlines, Inc., United Airlines Holdings, Inc., and Administrative Committee
4 for the Continental Retirement Plan (incorrectly named by plaintiffs as United Airlines Holdings’
5 Administrative Committee) (collectively, the “United Defendants”). I am an attorney licensed to
6 practice law in the State of California, and I am admitted to the bar of the United States District
7 Court for the Northern District of California. I make this declaration in support of the United
8 Defendants’ Motion to Dismiss Plaintiffs’ Second Amended Complaint in the above-captioned
9 matter.

10 2. Attached hereto as Exhibit 1 is a true and correct copy of excerpts from the
11 Collective Bargaining Agreement between United Airlines, Inc. and the International
12 Brotherhood of Teamsters, effective January 1, 2010. Exhibit 1 is identical to Exhibit 1 in my
13 prior declaration (Doc. No. 42-1).

14 3. Attached hereto as Exhibit 2 is a true and correct copy of a March 28, 2017
15 Memorandum from Edward Gleason, Esq., to the International Brotherhood of Teamsters Airline
16 Division. Exhibit 2 is identical to Exhibit 2 in my prior declaration (Doc. No. 42-1).

17 4. Attached hereto as Exhibit 3 is a true and correct copy of a May 1, 2018 letter
18 from Thomas Reardon, United’s Managing Director, Labor Relations - Ground, to Harry Beier.
19 Exhibit 3 is identical to Exhibit 3 in my prior declaration (Doc. No. 42-1).

20 5. Attached hereto as Exhibit 4 is a true and correct copy of the United Airlines
21 Holdings, Inc. Profit Sharing Plan, amended and restated effective January 1, 2019, except as
22 otherwise provided therein.

23 6. Attached hereto as Exhibit 5 is a true and correct copy of excerpts from the
24 Continental Retirement Plan, amended and restated effective January 1, 2007.

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I declare under penalty of perjury, under the laws of the United States of America, that the foregoing is true and correct.

Executed this 20th day of November 2020, in San Francisco, California.

/s/ Chris A. Hollinger
CHRIS A. HOLLINGER