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Evelyn D. Sahr

MEMBER
CO-CHAIR, AVIATION
CHAIR, INFRASTRUCTURE AND TRANSPORTATION
BOARD OF DIRECTORS

Evelyn Sahr, chair of the firm's Aviation Group, focuses her practice on regulatory, commercial and legislative regulatory matters impacting U.S. and foreign airlines. She serves on the Governing Committee of the American Bar Association's Forum on Air & Space Law and was selected for inclusion in *Chambers USA* for her national work in transportation law (Aviation: Regulatory). In addition, Evelyn is a frequent speaker at domestic and international industry conferences and delivers training seminars on numerous U.S. legal compliance matters.

Evelyn regularly represents foreign and domestic airlines before a number of federal agencies including the U.S. Department of Transportation (DOT), Federal Aviation Administration (FAA), Department of Justice (DOJ), Department of Homeland Security (DHS), Transportation Security Administration (TSA), National Transportation Safety Board (NTSB), U.S. Department of Treasury, U.S. Department of Commerce and Bureau of Customs and Border Protection (CBP). She also advises clients on foreign ownership requirements, licenses and operating authority, open skies, passenger rights , civil and criminal enforcement proceedings, slots and airport issues, and international safety assessments and standards. She also consults on tax, antitrust, environment, insolvency, intellectual property, labor/employment, equipment transactions, and other commercial matters relating to airlines.

Before entering private practice, Evelyn was a trial and appellate attorney with the U.S. Department of Justice's Civil Division.

REPRESENTATIVE MATTERS

- Defended international carrier in DOT enforcement proceeding alleging national origin discrimination based upon the carrier's compliance with laws of its home country.
- Represented carrier in U.S. DOT investigation & U.S. courts regarding erroneous first class fare published by third party entities. Over 2,000 tickets were sold in under 48 hours and ultimately cancelled by carrier. DOT investigation was successfully closed with no fine imposed after arguing tickets at issue were not "foreign air transportation" and therefore fell outside the jurisdiction of DOT. To date, all cases that were filed

PRACTICE AREAS:

Aviation
Unmanned Aircraft Systems (UAS)
International
Litigation
Appellate
Cybersecurity, Data Protection & Privacy
Artificial Intelligence, Robotics, and Autonomous Transportation Systems
Asia & Pacific Advisory Group
PFAS Chemicals
Israel Practice
Airport Law
Infrastructure and Transportation
Government Affairs
Antitrust & Competition Law

STATE ADMISSIONS:

District of Columbia

COURT ADMISSIONS:

U.S. Court of Appeals for the District of Columbia Circuit
U.S. Court of Appeals for the Fourth Circuit
U.S. Court of Appeals for the Sixth Circuit
U.S. Court of Appeals for the Tenth Circuit

EDUCATION:

J.D., George Washington University Law School, 1983
B.A., with honors, University of North Carolina at Chapel Hill, 1980; Phi Beta Kappa

by passengers have been dismissed in favor of client. Exposure for DOT fines and U.S. claims exceeded $30 million.

- Represented international airline in filing voluntary disclosure to U.S. Department of Commerce Bureau of Industry and Security regarding a potential violation of the Export Administration Regulations. Successfully argued that leased aircraft was not subject to the Export Administration Regulations.
- Provided assistance to international carriers planning to start operations to U.S. destinations, including Los Angeles, California; San Juan, Puerto Rico; and Miami, Florida. Engagement includes obtaining all necessary operating authority from Department of Transportation, Federal Aviation Administration, and Department of Homeland Security and assisting with airport and state/local business registration requirements for Q1 and Q2 2015 start-ups.
- Prepared and submitted Fixed Base Operator (FBO) application to New York State Department of Transportation (NYSDOT). Also represented client during the processing phase of the FBO application, including extensive lease negotiations.
- Represented international carrier in complex Department of Homeland Security tax audit pertaining to the collection of user fees.
- Represented international airline carrier in U.S. Department of Transportation investigation of alleged violation of DOT's tarmac delay rule. Carrier's scheduled flight to JFK was diverted to IAD due to poor weather and aircraft remained on tarmac at remote hardstand for over four hours. Responded to numerous information requests from DOT's Office of Aviation Enforcement and Proceedings and successfully argued the delay qualified for the air traffic control exception, which resulted in no fine being imposed against client for the delay.
- Provided ongoing advice and training at U.S. and foreign headquarters of firm clients to ensure compliance with 14 C.F.R. Part 382, Non-discrimination on the Basis of Disability in Air Travel. Developed and updated training materials and provided DOT-compliant training to airline personnel in airport operations, customer service and reservations departments.
- Filed comments on behalf of numerous carriers to U.S. Department of Transportation Notice of Proposed Rulemaking "Transparency of Airline Ancillary Fees and Other Consumer Protection Issues." Comments addressed multiple issues, including a proposal by the Department to clarify that fines for tarmac delays would be imposed on a per-passenger basis and a response to DOT's request for information on how it should treat erroneous fare tickets that are sold without a carrier's knowledge or consent.
- Representation of major Asian international airline in DOT Office of General Counsel investigation of tarmac delays in at JFK International Airport. Involved unique legal issue of potential application of domestic tarmac delay rule to foreign carriers under DOT's unfair and deceptive trade practice statute.

PROFESSIONAL AFFILIATIONS

- Immediate Past President and former Secretary and Vice-President of the International Aviation Club of Washington, DC
- American Bar Association (ABA)
- Co-Chair of the ABA Air & Space Law Form Subcommittee on Antitrust and Consumer Protection
- ABA Forum on Air & Space Law Governing Committee
- District of Columbia Bar Association
- District of Columbia Women's Bar Association
- National Business Aviation Association
- Chair, International Aviation Women's Association, Affiliations Committee
- Airports Council International
- Aero Club of Washington

COMMUNITY INVOLVEMENT

- Washington University Parents Council
- Democratic Poll Monitor

AWARDS AND RECOGNITION

- Selected for inclusion in *WWL Transport 2024*
- Named among the Top 10 Influential Regulatory Aviation Lawyers Shaping U.S. Airspace in 2023 by *Business Today*
- Selected for inclusion in *Chambers USA America's Leading Lawyers for Business* for Transportation: Aviation Regulatory
- Selected for inclusion in the *Euromoney Expert Guides: Guide to the World's Leading Aviation Lawyers*
- Selected for inclusion in the Legal Media Group *Expert Guide Women in Business Law 2015* (aviation)
- Selected for inclusion in *Washington D.C. Super Lawyers*

NEWS AND INSIGHTS

PUBLICATIONS

- "U.S. Customs and Border Protection Revises De Minimis Entry Rules for Packages Under $800," Eckert Seamans' Infrastructure and Transportation Update, September 9, 2025.
- "It's Not Too Late: The FAA Can Amend its Proposed sUAS Rules, Restore its Position as a Leading Voice in Aviation, and Guarantee the Long-Term Success of the U.S. Unmanned Aircraft Industry," Journal of Air Law and Commerce, June 2015.
- "Licensing Requirements for U.S. and Foreign Air Carriers," co-author, Aviation Regulation in the United States (ABA Book Publishing, 2014).
- "Non-discrimination on the Basis of Disability in Air Travel," co-author, Aviation Regulation in the United States (ABA Book Publishing, 2014).

- "Airlines Need Protections Too," The Air & Space Lawyer, May 2013.
- "Opening up a U.S. Branch of a Foreign Enterprise: An Overview," co-author, The Alert, Vol. 3, No. 3, September 1998.

MEDIA COVERAGE

- "Airlines Wary Of Giving Up Equity For Gov't COVID-19 Funds," Law360, April 2020.
- "Invest Sooner or Die Later," Air Cargo World, April 2009.

SPEAKING ENGAGEMENTS

- "Global Regulatory Updates" panelist, 14th Annual McGill Conference on International Aviation Liability, Insurance, and Finance in Montréal, September 2024.
- "Listen & Learn: Regulations in the Air," panelist, International Aviation Club program, August 2021.
- "The New Worldwide Airport Slot Guidelines," panelist, Airport Council International's 2019 International Aviation Issues Seminar, Washington, D.C., December 2019.
- "Airline Disability Regulation: A Nose-to-Tail Review of Emerging Global Trends and Other Hot Topics," moderator, American Bar Association's Forum on Air & Space Annual Meeting, September 2019.
- "Brexit's Aviation Implications," course planner for the ABA's Forum on Air & Space Law program, March 2019.
- "Anti-Sexual Harassment Workshop," presented for the JFK Airport Chamber of Commerce, December 2018.
- "Practical, Regulatory and Litigation Issues," American Bar Association Forum on Air & Space Law's Antitrust, Competition and Consumer Protection Committee, January 2017.
- "Passenger rights — signs of confusion?" moderator, IATA Legal Symposium (San Francisco), February 2014.
- "Aviation and Space: Global Reach/Global Challenges," moderator of the International Security Panel, American Bar Association Forum on Air and Space Law, September 2013.
- "Cargo Matters," moderator, IATA Legal Symposium (Shanghai, China), February 2012.