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24 US AIRWAYS, INC.

25 **UNITED STATES DISTRICT COURT**  
26 **FOR THE DISTRICT OF ARIZONA**

27 Don Addington, *et al.*;

28 Plaintiffs,

v.

US Airline Pilots Association and US  
Airways, Inc.,

Defendants.

Case No. 2:08-cv-01633-PHX-NW

**DECLARATION OF LYLE HOGG IN  
SUPPORT OF US AIRWAYS' OPPOSITION  
TO PLAINTIFFS' APPLICATION FOR  
PRELIMINARY INJUNCTION**

I, LYLE HOGG, pursuant to 28 U.S.C. § 1746, declare and state as follows:

1. I am the Vice President, Flight Operations, of US Airways, Inc. In this capacity, I have responsibility for US Airways' flight technical operations and flight training groups,

1 maintaining the airline's operations specifications and overseeing operations compliance with all  
2 FAA requirements. I also supervise US Airways' daily flight operations and the pilot and  
3 administrative management teams. Except as otherwise indicated, all facts set forth in this  
4 declaration are based upon my personal knowledge, my review of relevant documents, my  
5 opinion, my experience and knowledge of US Airways' flight operations, or are based upon  
6 knowledge of employees of US Airways reporting to me that are derived in the course of their  
7 duties. If called and sworn as a witness, I could and would testify competently thereto.

8 2. US Airways suffered net losses of \$236 million in the first quarter of 2008, \$567  
9 million in the second quarter and \$865 in the third quarter of 2008 -- a total loss of \$1.67 billion  
10 so far this year. In June 2008, US Airways announced that it would take a number of steps to  
11 address the difficult economic environment, including its plan to reduce its domestic mainline  
12 capacity by at least six percent beginning on October 1, 2008, and further reductions of domestic  
13 mainline capacity in 2009. The primary driver of US Airways' capacity reductions is a  
14 significant reduction in unprofitable Las Vegas night flying. Due to this reduction in flying, US  
15 Airways expected to eliminate approximately 10 mainline aircraft from its fleet in 2008 and 2009,  
16 and reduce pilot block hours by ten percent on the West side, and three percent on the East side,  
doe a total reduction of approximately six percent.

17 3. As a result of the planned capacity and fleet reductions, US Airways announced  
18 the reduction of approximately 1,700 employees, including 300 pilots (175 from the West fleet  
19 and 125 from the East fleet), across the airline's system beginning in the fall of 2008. The  
20 Company has modified its capacity and fleet reduction plan slightly since its initial  
21 announcement. Due to additional operational considerations in the East operations, including a  
22 delay in implementation of service to China, the postponement of certain E190 deliveries,  
23 seasonal operational changes and a reduction in pilot attrition due to the change in the federally-  
24 mandated pilot retirement age from 60 to 65, US Airways continues to require the furlough of 300  
25 pilots 175 from the West fleet and 125 from the East fleet during Separate Operations.  
26 Accordingly, US Airways reduced the number of pilots that it must furlough from the West  
27 system from 175 to 161 due to 14 pilots who requested leaves of absence in lieu of furlough. Of  
28

1 the remaining 161 pilots scheduled to be furloughed, 21 were considered new-hire pilots, leaving  
2 140 non new-hire West pilots to be furloughed. US Airways reduced the number of pilots that it  
3 must furlough from the East system from 125 to 98 because of pilots requesting leaves of absence  
4 in lieu of furlough and other adjustments. Of this group, 87 are new-hire pilots and 11 were  
5 active at the time of the merger.

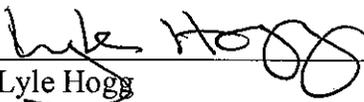
6 5. As a result of the furloughs, 76 East pilots and 130 West pilots will be subject to  
7 displacement to lower-paid positions in their respective fleets.

8 6. Even if the West furloughs do not take place as planned due to Court order, US  
9 Airways would have to implement the capacity reductions because they are its economically-  
10 necessary. For this reason, and the reasons stated in the Declaration of E. Allen Hemenway In  
11 Support of US Airways' Application for Preliminary Injunction that is being filed this same day,  
12 US Airways would simply retain the West pilots scheduled for furlough on its payroll without any  
13 associated flying for them to perform. As a result, the displacements associated with the  
14 furloughs will still occur.

15  
16 I declare under penalty of perjury under the laws of the United States of America that the  
17 foregoing is true and correct.

18 Dated: October 28, 2008

Respectfully submitted,

21 By:   
22 Lyle Hogg