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Attorneys for Plaintiffs

10 **IN THE UNITED STATES DISTRICT COURT**
11 **FOR THE DISTRICT OF ARIZONA**

12 DON ADDINGTON, <i>et al.</i> ; 13 14 Plaintiffs, 15 vs. 16 US AIRLINE PILOTS ASSOCIATION, and US AIRWAYS, INC., 17 Defendants.	12 CASE NO. 2:08-CV-1633-NVW 13 14 15 AFFIDAVIT OF KENNETH J. STRAVERS
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18 STATE OF ARIZONA)
19) ss
20 County of Maricopa)

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22 I, KENNETH J. STRAVERS, HEREBY DECLARE:

- 23 1. I am an adult resident of the State of California.
24 2. I have personal knowledge of and, if called to testify, I will be able to
25 testify to all matters stated herein.
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28 *Affidavit of Kenneth J. Stravers*

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3. I was hired by America West Airlines, Inc. ("America West") on July 5, 1989.

4. I was a pilot employed in the service of America West ("West Pilot") prior to the September 2005 merger with US Airways, Inc ("US Airways" or the "Company").

5. I am a pilot currently employed in the service of US Airways.

6. My domicile with US Airways is Phoenix, AZ ("PHX").

7. I am a former member of the Air Line Pilots Association ("ALPA").

8. When ALPA was the certified bargaining member of America West, I served in the following positions within the America West ALPA Master Executive Council ("MEC"): Negotiating Committee member, Strike Preparedness Committee Vice Chairman, PBS Committee member, Fenix Flight Magazine Associate Editor, Scheduling Committee member and I also served as the Chairman of the America West MEC Merger Committee during the entire merger negotiations between US Airways and America West.

9. During the US Airline Pilots Association ("USAPA") campaign to become the certified bargaining agent for US Airways, I was adamantly opposed to the formation and certification of USAPA.

10. I understood that pursuant to the USAPA Constitution and Bylaws that USAPA members could only join USAPA after approval from their domicile representative.

Affidavit of Kenneth J. Stravers

1 11. Since there was no domicile representative in PHX to approve any
2 applications, no West Pilots were able to become voting members of USAPA.

3 12. After USAPA's certification as the bargaining agent on April 18, 2008, I
4 had phone conversations with Mr. Steve Bradford about the PHX domicile
5 representation position within USAPA.
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7 13. On or about June 12, 2008, Mr. Bradford informed me that USAPA was
8 looking to appoint PHX domicile representatives (based on the pilot headcount) during
9 the first six months within the certification of USAPA, then later allowing the PHX
10 domicile members who apply and are approved as USAPA members to elect their own
11 PHX domicile representatives.
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13 14. On or about June 16, 2008, during a conversation with Mr. Bradford I
14 agreed to apply for the position, informing him that I was interested in serving as a PHX
15 domicile representative and serving on USAPA's Negotiating Committee, the
16 committee that would participate in the contract negotiations with the Company.
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18 15. Mr. Bradford then asked that I email USAPA a letter of interest and my
19 resume to apply formally for the position.
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21 16. I told Mr. Bradford that he knew of my extensive experience with the
22 America West MECs and the Merger Committee and that a resume and letter of interest
23 should not be necessary.
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25 17. I was never contacted again by any USAPA members regarding my
26 application for the position of PHX domicile representative.
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Affidavit of Kenneth J. Stravers

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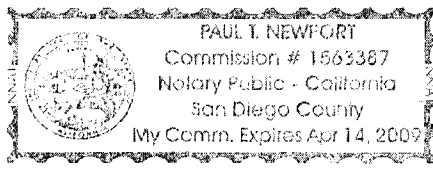
18. To my knowledge, there is no individual currently serving as the PHX domicile representative.

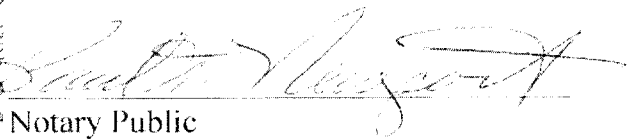
19. To my knowledge, there is no individual currently serving as the Las Vegas ("LAS") domicile representative.

Executed this 28TH day of October, 2008 at San Diego, California.


KENNETH J. STRAVERS

SUBSCRIBED AND SWORN TO before me this 28TH day of OCTOBER, 2008.




Notary Public

My commission expires:
April 14, 2009