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 8 **IN THE UNITED STATES DISTRICT COURT**  
 9 **FOR THE DISTRICT OF ARIZONA**

10 Don ADDINGTON, John BOSTIC,  
 Mark BURMAN, Afshin IRANPOUR,  
 11 Roger VELEZ; and Steve WARGOCKI,

CASE NO. 2:08-CV-1633-NVW

12 Plaintiffs,

13 vs.

**PROPOSED VOIR DIRE**

14 US AIRLINE PILOTS ASSOCIATION,  
 and US AIRWAYS, INC.,

15 Defendants.  
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17  
 18 1. Are you now or have you been a member of any union? If so,  
 19 please tell us the name of the union, the location of the local that you belong  
 20 to, and whether you ever held any leadership positions in the local or  
 21 national union?

22 2. Have you ever participated in an arbitration? If so, please tell  
 23 us the general nature of the dispute, whether the arbitration was binding or  
 24 not binding, and what the result was.

25 3. Do you have any background, training or experience with the  
 26 duty that a union has to represent the members fairly? This is usually  
 27  
 28

1 called the duty of fair representation or DFR for short. If you have heard  
2 the term before or read anything about it, please tell us.

3 4. Have you ever held stock in the company known as US Airways?

4 5. Have you ever held stock in the company known as America  
5 West Airlines?

6 6. Are you or anyone you know employed by US Airways? If so,  
7 please tell us in what capacity

8 7. Were you or anyone you know ever employed by America West  
9 Airlines? If so, please tell us in what capacity.

10 8. Have you or anyone you know ever had any experience with a  
11 merger between two different companies? If so, please tell us about your  
12 experience and include the type of business, and what your role was in the  
13 merger.

14 9. Have you or anyone you know ever had any experience with a  
15 merger between two different companies? If so, please tell us about your  
16 experience and include the type of business, and what your role was in the  
17 merger.

18 10. If you had experience with a merger, were you listed on a roster  
19 of personnel in order of your date of hire or seniority? If so, please tell us  
20 what kind of company and trade was involved.

21 11. Do you have any background, training or experience regarding  
22 the operation of unions or the duties of unions to the members?

1           12. Have you ever had an experience in an organization where you  
2 were in the minority on some issue that the organization voted on and the  
3 majority won the dispute?

4           13. Have you ever been in a trial or arbitration where you lost the  
5 case? Did you accept the result? Was there an appeal?

6           14. Have you ever been in a trial or arbitration where you won the  
7 case? Did the other side accept the result? Was there an appeal?

8           15. This case involves two groups of pilots who worked for separate  
9 airlines. When those airlines merged, the two groups of pilots had to be  
10 combined into a single list. The pilots could not agree how to do that so they  
11 submitted the issue to arbitration, which is like an informal trial. The  
12 arbitration panel of judges made a decision about how the single list was to  
13 be created. Is there anything in your life experience that sounds similar to  
14 this process?  
15

16           16. Is there anything else that you think we should know about  
17 your attitudes or opinions that you think might influence you one way or the  
18 other, based on the little that you have heard about the case so far?

19           17. Have you ever been laid off or furloughed from a position or had  
20 some change in your employment status where a younger or less  
21 experienced person was placed in an equal position with you, or perhaps  
22 even replaced you? Please tell us briefly about that experience.

23           18. Do you or anyone you know work at a trade or career in which  
24 date of hire seniority is used as a means of allocating benefits, working  
25 conditions, or furloughs and layoffs?  
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Dated this \_\_\_\_\_ day of March, 2009.

POLSINELLI SHUGHART P.C.

By: /s/  
Andrew S. Jacob  
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Attorneys for Plaintiffs

**CERTIFICATE OF SERVICE**

I hereby certify that on April 16, 2009, I electronically transmitted the foregoing document to the U.S. District Court Clerk's Office by using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

s/  
Andrew S. Jacob  
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