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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; Roger  
11 VELEZ; and Steve WARGOCKI,

12 Plaintiffs,

13 vs.

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

15 Defendants,

16 Don ADDINGTON; John BOSTIC; Mark  
BURMAN; Afshin IRANPOUR; Roger  
17 VELEZ; and Steve WARGOCKI,

18 Plaintiffs,

19 vs.

20 Steven H. BRADFORD, Paul J. DIORIO,  
Robert A. FREAR, Mark. W. KING,  
Douglas L. MOWERY, and John A.  
STEPHAN,

21 Defendants.  
22

Case No. 2:08-cv-1633-PHX-NVW  
(Consolidated)

**DEFENDANT USAPA'S  
NOTICE OF OBJECTIONS TO  
PLAINTIFFS' DESIGNATION OF  
DEPOSITION TESTIMONY OF  
HEMENWAY AND COUNTER  
DESIGNATIONS**

Case No. 2:08-cv-1728-PHX-NVW

**General Objections To Plaintiffs' Designation:**

i) Unfair prejudice because of incompleteness. FRE 403. Not cured because Plaintiffs object to their own proffer (Doc. # 410)

iii) Waiver. Plaintiffs have objected to their own proffer (Doc. # 410).

**Specific Objections To Plaintiffs' Designation:**

Page	Line	
21	12-25	Relevance; Misleading; Confusing
22	1-24	Relevance
24	8-19	Relevance; Misleading; Confusing
48	10-25	Relevance; Misleading; Confusing
49	1-24	Relevance; Misleading; Confusing
54	18-25	Relevance; Misleading; Confusing
55	1-23	Relevance
57	15-25	Relevance; Misleading; Confusing
58	5-25	Relevance; Misleading; Confusing
59	1-25	Relevance; Misleading; Confusing
64	14-26	Relevance; Misleading; Confusing
110	11-19	Relevance; Misleading; Confusing
126	11-25	Relevance; Misleading; Confusing
127	1-25	Relevance
128	1-24	Relevance

**Defendant's Counter Designation:**

Page	Line	
9	3-25	
10	1-25	
11	1-3	
16	13-25	
17-18	All	
19	1-8	
21	12-25	
22-28	All	

1	29	1-11
	30	15-25
2	31-34	All
	35	1-4
3	36	8-16
	37	12-25
4	38-47	All
	48	1-9
5	69	9-25
	70-82	All
6	83	1-16
	133	4-25
7	134-135	All
	136	1-6
8	148	24-25
	149	1-5
9	151	7-25
	152	1-8
10	171	22-25
	172	1-25
11	173	1-21

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1 Respectfully Submitted,

2 Dated: April 29, 2009

By: /s/ Nicholas P. Granath, Esq.

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14 *Attorneys for Defendant*  
15 *US Airline Pilots Association*

**CERTIFICATE OF SERVICE**

This is to certify that on the date indicated herein below true and accurate copies of the foregoing documents and their attachments, *to wit*,

- Defendant USAPA’s Notice Of Objections To Plaintiffs’ Designation Of Deposition Testimony Of Bradford And Counter Designations
- Certificate of Service

were electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all admitted counsel who have registered with the ECF system, including but not limited, to:

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Further, I certify that paper hard copies shall be provided to The Honorable Neil V. Wake, District Court Judge, 401 W. Washington Street, SPC 52, Phoenix, AZ 85003.

On April 29, 2009, by:

**/s/ Nicholas Paul Granath, Esq.**