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

11 US Airways, Inc., a Delaware
12 Corporation,
13 Plaintiff,

Case No. 2:10-cv-01570-PHX-ROS

14 v.

15 Don ADDINGTON, an individual; John
BOSTIC, an individual; Mark BURMAN,
16 an individual; Afshin IRANPOUR, an
individual; Roger VELEZ, an individual;
17 and Steve WARGOCKI, an individual, on
behalf of themselves and all other similarly-
18 situated individuals

19 and

20 US AIRLINE PILOTS ASSOCIATION, an
Unincorporated association,

21 Defendants.
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**DECLARATION OF
COURTNEY BORMAN**

1 I, COURTNEY BORMAN, declare that the following is true and correct:

2 1. I make this declaration of my own free will, based on my personal, first-
3 hand knowledge, unless otherwise specifically indicated.

4 2. This declaration is made in support of USAPA's opposition to the
5 Addington defendants' motion for class certification.

6 3. I am currently a First Officer and have been employed by US Airways as
7 a Pilot since 1999, furloughed in 2002 and resumed again in 2007. I am currently a
8 member in good standing with USAPA.

9 4. I am currently the Chairman of the USAPA Furlough Committee. I also
10 hold positions on the USAPA Accident & Investigation Committee, Membership
11 Services Committee and the Communications Committee. My duties and
12 responsibilities as Chairman of the Furlough Committee include, but are not limited to,
13 the following: Assisting Furloughed Pilots, ensuring furloughed pilots' questions are
14 answered and responded to correctly per each CBA by US Airways while in the
15 furloughing process. I also assist pilots returning to active service, ensuring their
16 questions are answered and pilots are recalled per CBA. I also act as a point of contact
17 for these pilots and USAPA. I conduct an informational class/briefing while returning
18 pilots are in ground school upon returning from Furlough, Medical, Military or other
19 leaves of service from US Airways. These briefing sometimes includes new hires.

20 5. As Chairman of the Furlough Committee, I routinely monitor US Airways
21 pilots that have been furloughed by the company – including whether those pilots have
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1 been offered recall to the Company and whether they have accepted those offers of
2 recall.

3 6. The pilots of US Airways currently operate under two separate contracts –
4 one for the former US Airways (“East”) pilots and another for the former America West
5 (“West”) pilots. As US Airways recalls furloughed pilots to both independent sides,
6 East and West respectively, after completion of all pilots from said lists, then remaining
7 positions are offered in seniority order to the remaining pilots from the other list prior to
8 adding additional pilots through the hiring of new pilots. All original West pilots were
9 offered East E190 positions for class in November 2010 and any remaining furloughed
10 West pilot was offered a May 2011 class to return to any East Boeing 737, Airbus
11 319/320/321, or E190. Currently, at anytime, a West pilot can return to US Airways in
12 his West seniority spot on the list (relative to other previous West pilots) as an East First
13 Officer, because at this time US Airways has currently hired 20 additional pilots in
14 2011. US Airways, at this time, has scheduled an additional 44 pilots to be hired to the
15 East side before the middle of September 2011. Currently 17 previously West pilots are
16 employed as East First Officers.

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18 7. Proposed class representative Afshin Iranpour was furloughed by the
19 Company on April 1, 2009. First Officer Iranpour was offered a recall class to the West
20 operation on September 6, 2010, and he accepted that offer. He is currently flying for
21 US Airways under the West CBA.
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