

Declaration of Courtney A. Borman

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15 Attorneys for Defendant US Airline Pilots Association

16 IN THE UNITED STATES DISTRICT COURT

17 DISTRICT OF ARIZONA

18 US Airways, Inc., a Delaware
19 Corporation,

20 Plaintiff,

21 v.

22 Don Addington, an individual; John
23 Bostic, an individual; Mark Burman,
24 an individual; Afshin Iranpour, an
25 individual; Roger Velez, an individual;
26 and Steve Wargocki, an individual, on
27 behalf of themselves and all other
28 similarly-situated individuals,

and

US Airline Pilots Association, an
unincorporated association,

Defendants.

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

) **Declaration of Courtney A. Borman**

1 COURTNEY A. BORMAN declares as follows under penalty of perjury pursuant
2 to 28 U.S.C. § 1746:

3 1. I am currently a pilot employed by US Airways and have been so employed
4 since hired in June of 1999. I was furloughed in January 2002 and recalled in May of
5 2007.

6
7 2. Since USAPA's inception in April 2008, I have worked with returning
8 furloughed pilots, new hire pilots and those returning from any leaves (Military, Medical
9 or Personal) during indoc classes as they returned or joined US Airways. This included
10 working with the company to ensure correct and updated information for the USAPA
11 records, making a USAPA presentation to all pilots when returning from leaves or joining
12 US Airways and answering all pilots' questions while in indoc. I continue to do this at
13 this time as US Airways is currently hiring pilots.
14

15
16 3. In June of 2008, USAPA President Steve Bradford appointed me "Furlough
17 Committee Chairman" and I assisted those pilots being furloughed or taking enhanced
18 voluntary leaves of absence (EVLA's). This included working with US Airways
19 management to ensure the proper handling of pilots as they were furloughed and
20 compiling accurate data for information on when and who was furloughed at what time. I
21 also assisted those pilots that had questions about the EVLA's as USAPA negotiated an
22 EVLA program for the West pilots to help assist in deferring of furloughs. These duties
23 included assisting pilots when US Airways had base closures. The official USAPA title
24 is now "Membership Services Committee Chairman" as the Furlough committee and
25 Membership Services committees have been combined.
26
27

28 4. In the fall of 2008, I also was asked to join the USAPA Pilot-For-Pilot

1 committee and worked to dispel rumors, answer questions, update the USAPA message
2 boards in the Phoenix and DCA domiciles and assist the Communications committee as
3 needed. In the first quarter of 2009, I was added as a full member of the
4 Communications committee and assisted the Chairman and Vice chairman as needed in
5 taking notes, meeting updates, and all other tasks as needed. In October of 2009, I was
6 appointed as Vice Chairman of the Pilot-For-Pilot Committee to assist the Chairman as
7 needed including overseeing USAPA base leaders and conducting Pilot-For-Pilot
8 conference calls.
9
10

11 5. In the summer of 2009, I was asked to join the Accident Investigation
12 Committee and attended NTSB-AS-301 training in September of 2009. My duties were
13 and are to assist the committee as needed including, working on handouts and assisting in
14 case of an accident in the western part of the US Airways network due to my Phoenix AZ
15 residence.
16

17 6. I make the statements in this declaration based on my own personal
18 knowledge and on the basis of information USAPA receives from US Airways in the
19 normal course of business.
20

21 7. By late 2007, US Airways had recalled all East pilots who had been on
22 furlough at the time the merger was announced. Of the 1691 pilots who were originally
23 listed as furloughed, approximately 700 actually accepted recall. In late 2007 and early
24 2008, US Airways hired 101 new pilots.
25

26 8. US Airways closed the Pittsburgh domicile effective March 1, 2008, and in
27 June 2008 announced the furlough of 300 pilots, 175 from the West and 125 from the
28 East. Due to offers of enhanced voluntary leaves of absence negotiated by USAPA, 144

1 West pilots and 84 East pilots were actually furloughed.

2 9. US Airways closed its LaGuardia, Las Vegas and Boston domiciles in the
3 first half of 2010. There were no associated furloughs. Almost all of the pilots displaced
4 by these closures bid into other domiciles. Pilots who otherwise would have been
5 furloughed either accepted early retirement or enhanced leaves of absence negotiated by
6 USAPA or had their furloughs offset by pilots elsewhere in the system who took early
7 retirement or enhanced leave.
8

9
10 10. All furloughed pilots—West and East—were offered recall to the smaller
11 EMB190 aircraft by December 2010 and to group 2 aircraft (737s and A319/320s) by
12 May 2011. All of the remaining West pilots still on furlough were offered recall to East
13 positions. Initially 53 declined and 19 accepted. However at this time another three have
14 accepted recall effective in February and March 2012. After March 2012 only 20 West
15 pilots will remain furloughed that will have not been offered recall to the West. The
16 remaining furloughed pilots have either accepted recall to the East or bypassed West
17 recall at this time.
18

19
20 11 During 2011, US Airways hired 49 new pilots.

21 12. As of 2011, there were 3394 pilots on the East seniority list and 1658 on the
22 West seniority list.

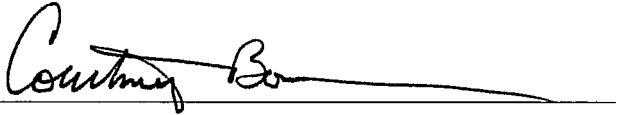
23 13. US Airways plans to hire 44 new pilots in the first quarter of 2012 and to
24 continue hiring at the rate of approximately 20 pilots each month thereafter.
25

26 14. As of the end of 2011, US Airways operated 220 jet passenger aircraft in its
27 East operation including 26 wide- body aircraft (16 A330s and 10 767s) and 120 aircraft
28 in its West operation, none wide-body.

1 I declare under penalty of perjury that the foregoing is true and correct.

2 Executed on January 27, 2012, in Phoenix, Arizona.

3 Dated: January 27, 2012
4 Phoenix, Arizona

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6

7 COURTNEY A. BORMAN

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