

DECLARATION OF BRIAN STOCKDELL

STATE OF ARIZONA)
County of Maricopa)

I, Brian Stockdell, HEREBY DECLARE under penalty of perjury that the following is true and correct to the best of my knowledge and information:

1. I am an adult resident of the State of Arizona.
2. I have personal knowledge of and, if called to testify, I will be able to testify to all matters stated herein.
3. I was hired by America West in 1997.
4. I am a pilot presently employed in the service of American Airlines, Inc.
5. I am a member of USAPA in good standing in accordance with USAPA’s Constitution and Bylaws as of its decertification on September 16, 2014.
6. I personally prepared the four charts attached herein as Exhibits “A”, “B”, “C”, and “D”. They are graphic representations to illustrate, contrast and compare the East/West seniority using the Nicolau Arbitration Award versus USAPA’s Date of Hire (DOH) list. I prepared these charts using data and information provided by USAPA, as well as updated relevant data and information available from the airline to account for pilot attrition.
7. Exhibit A (“2008 East Nicolau vs. DOH”) is based on USAPA’s 2008 DOH submission to US Airways. I updated USAPA’s DOH list by removing pilots no longer with the company at that time. That data was placed into an Excel spreadsheet. East pilots were colored red, West pilots were colored blue, and East pilots furloughed at the time of the US Airways/America West merger were colored black. The column of colored cells was then copied into PowerPoint and compressed to fit the page. This column is labelled in Exhibit A as “DOH”. This process was repeated for the Nicolau list, removing the names of pilots no longer with the company to be consistent with USAPA’s updated DOH list. This column is labelled in Exhibit A as “Nicolau”. Next, the names of the Defendants, as well as the members of the East Merger Committee, were located in their approximate position on each list and an arrow was drawn from their position on the Nicolau list to their position on the DOH list.

8. Exhibit C (“2008 West Nicolau vs. DOH”) uses the same data as Exhibit A. It shows the positions of the Plaintiffs as well as the former West BPR members on the respective lists.

9. Exhibits B and D (respectively “2015 East Nicolau vs. DOH” and “2015 West Nicolau vs. DOH”) were derived from the list to create exhibit 148 used in *Addington II*. The seniority list was aged to March 2015 by removing those pilots that reached the mandatory retirement age of 65. The same process described above was used to create the chart. The difference between the two sets of charts is that 5,176 pilots were on the seniority list in 2008, while the number of pilots shrunk to 4,397 by March 2015.

10. A true and correct copy of “Trial Exhibit 148”, admitted into evidence in *Addington v. U.S. Airline Pilots Association*, 2:13-cv-00471-ROS, is attached hereto as Exhibit “E.”

Pursuant to 29 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 27th day of March, 2015.

A handwritten signature in black ink, reading "Brian Stockdell". The signature is written in a cursive style with a large, looped "B" and "S".

Brian Stockdell