

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA**

EDDIE BOLLMEIER, et al.,)	
)	
Plaintiffs,)	
v.)	Case No. 3:15-cv-00111-RJC-DCK
)	
GARY HUMMEL, et al.,)	
)	
Defendants.)	
_____)	

[PROPOSED] TEMPORARY RESTRAINING ORDER

This matter, having come before the Court on Plaintiffs’ Eddie Bollmeier, Bill Tracey, and Simon Parrott Motion for Temporary Restraining Order pursuant to Rule 65 of the Federal Rules of Civil Procedure, and the Court having considered Plaintiffs’ and Defendants’ respective submissions, and it appearing that good cause exists for granting the Temporary Restraining Order because Plaintiffs have demonstrated a likelihood of success on the merits and Plaintiffs will be irreparably harmed if the TRO is not issued, it is this __ day of ___, 2015 hereby ORDERED THAT:

1. Defendants Gary Hummel, Stephen Bradford, Rob Streble, Steve Smyser, Robert Frear, Courtney Borman, Ronald Nelson, Paul Diorio, Paul Music, John Taylor, Jay Milkey, and Stephen Nathan and each of them are temporarily restrained from authorizing the expenditure of USAPA funds obtained from the collection of dues and assessments of US Airways pilots during the period that USAPA was the exclusive bargaining agent of US Airways pilots in support of activities of any kind, including but not limited to payment of attorneys, experts, witnesses, office space or flight pay loss to pilots for purposes of

preparing for and participating in the Substantive Seniority Integration Process
culminating in an arbitration before Arbitrators Dana Eischen, Ira Jaffe and W. David
Vaughn.

2. Because the funds that are the subject of the Complaint in the case will remain with USAPA during the pendency of the case and because Defendants will have access to funds provided by the Allied Pilots Association for the purpose of preparing for and participating in the Substantive Seniority Integration Process, the Court finds pursuant to Rule 65 (c) that no bond is required for the issuance of this Temporary Restraining Order.
3. This Order will expire on _____, 2015 unless extended by the Court for good cause or unless Defendants consent to an extension.
4. The Court will hold a hearing on Plaintiffs' Motion for a Preliminary Injunction on _____, 2015.

United States District Judge