

THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

CIVIL ACTION NO.: 3:15-cv-00111-RJC-DCK

EDDIE BOLLMEIER, BILL TRACEY and,)
SIMON PARROTT,)
)
Plaintiffs,)
)
v.)
)
GARY HUMMEL, STEPHEN BRADFORD,)
ROB STREBLE, STEVE SMYSER, ROBERT)
FREAR, COURTNEY BORMAN, and JANE DOE)
BORMAN, RONALD NELSON, PAUL DIORIO,)
PAUL MUSIC, JOHN TAYLOR, JOE STEIN)
PETE DUGSTAD, JAY MILKEY,)
and STEPHEN NATHAN,)
)
Defendants.)
)
_____)

**DECLARATION OF
STEPHEN BRADFORD
IN SUPPORT OF
MOTION TO
DISMISS VERIFIED
COMPLAINT**

Stephen Bradford, declares as follows under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am currently the Vice President of the US Airlines Pilots Association (“USAPA”) and the incoming President (as of April 18, 2015), and I submit this declaration with respect to the Motion to Dismiss the Verified Complaint on behalf of myself and defendants Gary Hummel, Rob Streble, John Taylor, Joe Stein, Pete Dugstad, and Stephen Nathan. Unless otherwise indicated, this declaration is based upon my personal knowledge of USAPA matters and my review of USAPA records.

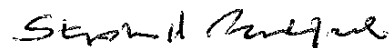
2. Annexed hereto as Exhibit “A” is a true and correct copy of a Statement issued by the National Officers of USAPA on September 16, 2014 in connection with their decision

to defer dissolution of USAPA, and related decisions and determinations. On that same date or shortly thereafter, this Statement was posted on the USAPA website.

3. In September 2014 a referendum was placed before the USAPA membership to amend the USAPA Constitution and Bylaws so as to transfer the power to decide to defer dissolution of USAPA from the National Officers to the Board of Pilot Representatives (“BPR”). Pursuant to the USAPA Constitution and Bylaws, a two-thirds majority of eligible votes cast is required to amend the Constitution. The proposed amendment failed due to a lack of two-thirds majority as set forth in the true and correct copy of the referendum results set forth as Exhibit “B” hereto. The Phoenix domicile voted in opposition to the constitutional amendment 761 to 11, or 98.58% opposed to the amendment.

4. Annexed hereto as Exhibit “C” is a true and correct copy of a BPR Resolution (titled “Agenda Item - Discussion and resolution of Constitutional issues, including those contained in Article I, Section 3 of the USAPA Constitution dealing with Duration and/or Dissolution”) duly adopted by the USAPA BPR on September 4, 2014. This excerpt is provided because the official minutes of the BPR meeting are not yet available.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 15th day of April, 2015.



Stephen Bradford