

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

US AIRLINE PILOTS ASSOCIATION,

Plaintiff,

v.

US AIRWAYS, INC.; AMERICAN  
AIRLINES, INC.; and ALLIED PILOTS  
ASSOCIATION,

Defendants.

Case No. 14-cv-00328 (BAH)

**DECLARATION OF ROBERT A. SIEGEL IN SUPPORT OF DEFENDANTS’  
JOINT MOTION FOR A PROTECTIVE ORDER TO STAY ALL DISCOVERY**

I, Robert A. Siegel, submit the following declaration in support of the Motion of US Airways, Inc. and American Airlines, Inc. (collectively, “the Company”), and the Allied Pilots Association (“APA”) for a Protective Order to Stay All Discovery:

1. I am an attorney licensed to practice law in the District of Columbia, a member in good standing of the Bar of this Court, and a partner with the law firm of O’Melveny & Myers LLP. I am one of the attorneys principally responsible for the representation of the Company in this matter. I have personal knowledge of the facts set forth below, and, if called as a witness, I could and would competently testify thereto.

2. On May 16, 2014, plaintiff US Airline Pilots Association (“USAPA”) served requests for the production of documents on all defendants.

3. Attached hereto as Exhibit A is a true and correct copy of USAPA's First Request to American Airlines, Inc. for the Production of Documents, served on May 16, 2014.

4. Attached hereto as Exhibit B is a true and correct copy of USAPA's First Request to US Airways, Inc. for the Production of Documents, served on May 16, 2014.

5. Attached hereto as Exhibit C is a true and correct copy of USAPA's First Request to the APA for the Production of Documents, served on May 16, 2014.

I declare, under penalty of perjury under the laws of the United States of America, that the foregoing is true and correct.

Dated: June 18, 2014.

/s/ Robert A. Siegel  
Robert A. Siegel  
(D.C. Bar No. 1004474)