

Exhibit C

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

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US AIRLINE PILOTS ASSOCIATION)
)
Plaintiff/Counter-Defendant,)
)
v.) Case No. 14-CIV-00328 (BAH)
)
US AIRWAYS, INC., AMERICAN AIRLINES, INC.)
)
and)
)
THE ALLIED PILOTS ASSOCIATION)
)
Defendants/Counter-Plaintiffs.)
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Plaintiff’s First Request to the Allied Pilots Association for the Production of Documents

Pursuant to Rule 34 of the Federal Rules of Civil Procedure and the April 22, 2014 Minute Order, plaintiff US Airline Pilots Association (“USAPA”), by its attorneys, request that defendant Allied Pilots Association (“APA”) produce the following requested documents to counsel for the Plaintiff.

Definitions and Instructions

1. The term “plaintiff” refers to plaintiff USAPA, and is intended to cover plaintiffs, employees, agents, representatives, attorneys, consultants, administrators, officers, committee members, or other persons or entities who have acted for or on behalf of plaintiff whether or not correctly named.
2. “American” refers to defendant American Airlines, Inc., American Airlines Group, Inc., and AMR Corporation, and is intended to cover American Airlines, Inc., American Airlines Group, Inc., and AMR Corporation, their subsidiaries, officers, directors, employees, agents, representatives, attorneys, consultants, administrators, committee members, or other persons or entities who have acted for or on behalf of American Airlines, Inc. whether or not correctly named.
3. “APA” refers to defendant Allied Pilots Association and is intended to cover APA, employees, agents, representatives, attorneys, consultants, administrators, officers, committee

members, or other persons or entities who have acted for or on behalf of plaintiff whether or not correctly named.

4. “US Airways” refers to defendant US Airways, Inc., and is intended to cover US Airways, Inc., and US Airways Group, Inc., their subsidiaries, officers, directors, employees, agents, representatives, attorneys, consultants, administrators, committee members, or other persons or entities who have acted for or on behalf of US Airways, Inc. whether or not correctly named.

5. “West Merger Committee” refers to the committee comprised of David Braid, Johan DeVicq, Doug Dotter, Eric Ferguson, Russ Payne, and their counsel Marty Harper, Andy Jacob and Jennifer Axel, as defined in the December 10, 2013 email from Jennifer Axel to Paul Jones, Mark Kennedy, Ed James, and Patrick Szymanski.

6. “Person” shall be defined as any natural person or any business, legal or governmental entity or association, firm or other entity of whatsoever kind, nature or description, and all other forms of organization or association.

7. “Pertaining to” shall mean concerning, referring to, relating to, regarding, describing, evidencing, showing, memorializing, comprising, setting forth, studying, recommending, alluding to, mentioning, discussing, reflecting, negating, amending, analyzing, reporting on, commenting on, considering, mentioning, containing, reproducing, paraphrasing, identifying, dealing with, summarizing, explaining, detailing, omitting, interpreting, constituting, or quoting any language of.

8. The term “document” is defined as all writings, printed matter of any kind or description, and/or electronically stored data whatsoever, including but not limited to, drafts, originals and all copies of correspondence, email communications, text messages, webmail, memoranda, evaluations, oaths, letters, telegrams, minutes, opinions, contracts, agreements, policies, reports, studies, statements, receipts, books, inter-office or intra-office communications including intranet communications, telephone message slips, offers, handwritten or electronic notations, interviews, conferences or other meetings, bulletins, drawings, plans, computer generated printouts, computer input or output, data including electronically stored data or information, teletypes, telefaxes, invoices, work sheets, ledger books, statistical records, books of account, microfilm, diskettes, CD-Rom, tapes, statements of account, and all drafts, alterations, modifications, changes and amendments to any of the foregoing whether handwritten, computer

generated or otherwise, and any other tangible thing on which information is recorded in writing, sound, electronic, web or magnetic impulse.

9. The term “communications” means any oral or written utterance, notation or statement of any nature whatsoever, by and whomsoever made, including but not limited to, correspondence, letters, telegrams, notices, messages, faxes, memos, e-mails, notes, inquiries, memorandums, negotiations, understandings, meetings, encounters, conferences, telephone conversations, telephone call logs, telephone messages, conversations, dialogues, discussions, interviews, consultations, agreements, and any other understanding or form of exchange between two or more persons or entities, whether oral or written.

10. “Identify”, “state the identity of”, or any similar phrase:

- a. When used with reference to a natural person, means to state in the answer in each instance that person’s full name, that person’s last known home address and telephone number, that person’s last known business address and telephone number, that person’s last known email address and that person’s employer.
- b. When used with reference to a non-person (e.g., a corporation, partnership, etc.), means to state in the answer in each instance the non-person’s name, type of entity, business address at the time referred to in the inquiry and, if different, its present business address.
- c. When used with reference to a document, means to state in the answer in each instance, the document’s date, identification of each person who prepared it (if known), a general description of its type, its subject matter and identification of each custodian.
- d. When used with reference to a communication or representation, means to state and describe the communication or representation, including the means by which it occurred, the date, the substance, the persons making, the persons/entity receiving, the persons/entity involved in, and the persons/entity privy to the communication or representation.

11. All electronically stored information (“ESI”) shall be produced in both “native” formats and searchable “TIF” formats with metadata, together with a description of the system from which it was derived sufficient to permit rendering the materials intelligible and load files in “.dll” format. If a scanned document is more than one page, the utilization of the document creating the

image file and any attachments should be produced as it existed in the original when creating the image file. Electronic copies of documents shall be produced on a conventional digital storage medium, such as CD-ROM, DVD, or removable hard drive.

12. If you decline to answer/respond to a request based on a claim of privilege or on any other basis:

- a. Identify the grounds and reasons for withholding the information;
- b. Disclose the facts upon which you are relying in asserting such a claim; and
- c. Identify in accordance with the definition of “identify” as stated above, any documents that fall within the request which you do not turn over on the basis of objection or an assertion of privilege.

Documents Demanded

1. All documents and communications, including documents and communications to and from any or all of the individuals identified in the APA’s Initial Disclosures, pertaining to paragraph 10 of the MOU and its subparts (including drafts and comments to drafts).

2. All documents and communications, including documents and communications to and from any or all of the individuals identified in the APA’s Initial Disclosures, pertaining to paragraph 20 of the MOU (including drafts and comments to drafts).

3. All documents and communications, including documents and communications to and from any or all of the individuals identified in the APA’s Initial Disclosures, pertaining to negotiations over the Seniority Integration Protocol Agreement (including drafts and comments to drafts).

4. All documents and communications, including documents and communications to and from any or all of the individuals identified in the APA’s Initial Disclosures, pertaining to MTA Disputes #4 and #5 (including drafts and comments to drafts).

5. All documents and communications to and from the APA and US Airways concerning the order issued January 10, 2014 by the United States District Court for the District of Arizona in *Addington, et al v. US Airline Pilots Ass’n*, Case No. 13-cv-471-ROS (Document #298).

6. All documents and communications to and from the APA and American concerning the order issued January 10, 2014 by the United States District Court for the District of Arizona in *Addington, et al v. US Airline Pilots Ass’n*, Case No. 13-cv-471-ROS (Document #298).

7. All documents and communications to and from the APA and the plaintiffs in *Addington, et al v. US Airline Pilots Ass'n*, Case No. 13-cv-471-ROS concerning the order issued January 10, 2014 by the United States District Court for the District of Arizona in Case No. 13-cv-471-ROS (Document #298).

8. All documents and communications to and from the APA and US Airways concerning US Airways' motion to correct the court's judgment pursuant to Federal Rules of Civil Procedure 60(A) and to modify the court's order pursuant to Rules 52(B) and 59(E) in *Addington, et al v. US Airline Pilots Ass'n*, Case No. 13-cv-471-ROS (Document #300).

9. All documents and communications to and from the APA and American concerning US Airways' motion to correct the court's judgment pursuant to Federal Rules of Civil Procedure 60(A) and to modify the court's order pursuant to Rules 52(B) and 59(E) in *Addington, et al v. US Airline Pilots Ass'n*, Case No. 13-cv-471-ROS (Document #300).

10. All documents and communications to and from the APA and the plaintiffs in *Addington, et al v. US Airline Pilots Ass'n*, Case No. 13-cv-471-ROS concerning US Airways' motion to correct the court's judgment pursuant to Federal Rules of Civil Procedure 60(A) and to modify the court's order pursuant to Rules 52(B) and 59(E) in *Addington, et al v. US Airline Pilots Ass'n*, Case No. 13-cv-471-ROS (Document #300).

11. All documents and communications to and from the APA and US Airways concerning the order issued March 31, 2014 by the United States District Court for the District of Arizona in *Addington, et al v. US Airline Pilots Ass'n*, Case No. 13-cv-471-ROS (Document #304).

12. All documents and communications to and from the APA and American concerning the order issued March 31, 2014 by the United States District Court for the District of Arizona in *Addington, et al v. US Airline Pilots Ass'n*, Case No. 13-cv-471-ROS (Document #304).

13. All documents and communications to and from the APA and the plaintiffs in *Addington, et al v. US Airline Pilots Ass'n*, Case No. 13-cv-471-ROS concerning the order issued March 31, 2014 by the United States District Court for the District of Arizona in Case No. 13-cv-471-ROS (Document #304).

14. All documents and communications between the APA and any person purporting to represent a West pilot craft or class, including but not limited to Marty Harper, concerning paragraph 10, and its subparts, and/or paragraph 20 of the MOU.

15. All documents and communications between the APA and any person pertaining to the December 20, 2013 meeting held in Washington D.C. attended by representatives on behalf of the “West Merger Committee”, US Airways, American, and the APA.

16. All documents and communications to and from the APA and the “West Merger Committee”, its members and/or its attorneys pertaining to seniority integration.

17. All documents and communications among US Airways, American, and/or the APA pertaining to their respective motions to compel arbitration filed in this action.

18. All documents and communications pertaining to and/or in support of the APA’s denial of each and every averment in paragraph 26 of the Complaint in this action.

19. All documents and communications pertaining to and/or in support of the APA’s response in its answer and counterclaims to paragraph 41 of the Complaint in this action.

20. All documents and communications pertaining to the APA’s response to USAPA’s February 20, 2014 letter to the NMB requesting a list of seven potential arbitrators pursuant to Section 13(a) of the McCaskill-Bond Amendment, including communications with American and/or US Airways.

21. All documents and communications pertaining to the APA’s allegation in paragraph 88 of its answer and counterclaims that it “will be substantially injured by USAPA’s repudiation of its contractual obligations under the MOU.”

22. All documents and communications pertaining to the APA’s Third Claim for Relief in its answer and counterclaims.

23. All documents and communications identified in the APA’s Initial Disclosures.

PLEASE TAKE FURTHER NOTICE, that pursuant to Rule 26(e) of the Federal Rules of Civil Procedure, the responding party has a continuous duty to amend and/or supplement responses, if necessary.

Dated this 16th day of May, 2014.

Respectfully submitted,

By: s/ William R. Wilder
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on counsel for the defendants on May 16, 2014 by electronic and first class mail.

/s/ William R. Wilder
William R. Wilder