

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION
CIVIL ACTION NO. _____

US AIRWAYS, INC.,

Plaintiff,

v.

US AIRLINE PILOTS ASSOCIATION and
MICHAEL J. CLEARY,

Defendants.

**DECLARATION OF SLOANE GIDDON IN
SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY INJUNCTION**

I, SLOANE GIDDON, declare and state as follows:

1. I am an associate at the law firm of O'Melveny & Myers LLP, Times Square Tower, 7 Times Square, New York, New York 10036. I am a member in good standing of the Bar of the State of New York. O'Melveny & Myers LLP is counsel to Plaintiff US Airways, Inc. ("US Airways") in this matter.

2. US Airways provided me with several videos released by Defendant US Airline Pilots Association ("USAPA"). Under my direction and supervision, I caused transcripts of these videos to be created, which I then reviewed for accuracy.

3. I have attached as Exhibit 1 a true and correct copy of the transcript of the video regarding on-time performance pressure and ground crews approaching aircraft released by USAPA's Safety Committee Chairman, Thomas K. Kubik, on March 23, 2011.

4. I have attached as Exhibit 2 a true and correct copy of the transcript of the video regarding pilot fatigue released by USAPA's Safety Committee Chairman, Thomas K. Kubik, on March 30, 2011

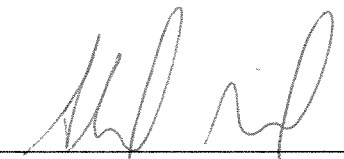
5. I have attached as Exhibit 3 a true and correct copy of the transcript of the video regarding MELs released by USAPA's Safety Committee Chairman, Thomas K. Kubik, and dated April 4, 2011.

6. I have attached as Exhibit 4 a true and correct copy of the transcript of the video regarding Chief Pilots released by USAPA's Safety Committee Chairman, Thomas K. Kubik, on May 11, 2011.

7. US Airways also provided me with a recording of a recorded call. Under my direction and supervision, I caused a transcript of this recording to be created, which I then reviewed for accuracy. I have attached as Exhibit 5 a true and correct copy of the transcript of this recording.

I declare under penalty of perjury under the laws of the United States that the foregoing statements are true and correct.

Executed this 28th day of July, 2011, at New York, New York.



Sloane Giddon

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **DECLARATION OF SLOANE GIDDON IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION** was served on Defendants United Airlines Pilots Association and Michael J. Cleary by depositing a copy with the United States Postal Service, certified mail, return receipt, postage prepaid, addressed to the following:

US Airline Pilots Association
c/o Michael J. Cleary
26-A Cedar Point Road
Durham, NH 03824

Michael J. Cleary
26-A Cedar Point Road
Durham, NH 03824

and on Defendant United Airlines Pilots Association via hand delivery to the following address:

US Airline Pilots Association
200 East Woodlawn Road, Suite 250
Charlotte, North Carolina 28217-2207

This the 29th day of July, 2011.

/s/ Robert R. Marcus

Robert R. Marcus

Attorney for Plaintiff