

ADDINGTON, et al. v. US AIRLINE PILOTS ASSOCIATION, et al.
Case No. 2:13-cv-00471-PGR

DECLARATION BY ANDREW S. JACOB IN SUPPORT OF WEST
PILOTS' MOTION TO TRANSFER ACTION TO JUDGE WAKE OR
JUDGE SILVER

I, Andrew S. Jacob, declare the following to be true based upon my personal knowledge and information under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I was one of the attorneys representing the West Pilot Class in CV 2:08-CV-1633-PHX-NVW that was litigated in the United States District Court, District of Arizona.

2. I was one of the attorneys representing the West Pilot Class in 2:10-CV-01570-PHX-ROS that was litigated in the United States District Court, District of Arizona.

3. I am one of the attorneys representing the West Pilot Class in this action to defend the Nicolau Award during the pending merger of US Airways and American Airlines.

4. In mid-2008, the West Pilots formed Leonidas, LLC, for the sole purpose of collecting voluntary West Pilot contributions

that have been used to defend the Nicolau Award in and out of litigation.

5. Leonidas has never been a party to litigation.

6. Attached as Exhibit “1” is a true and correct copy of the “Memorandum of Understanding Regarding Contingent Collective Bargaining Agreement,” (the “MOU”) that was the subject of a ratification vote by the membership of the US Airline Pilots Association (“USAPA”).

7. Attached as Exhibit “2” is a true and correct copy of a the Complaint filed in the United States Bankruptcy Court, Southern District of New York, Case No. 11-15463-SHL.

DATED: March 7, 2013.

s/ Andrew S. Jacob

Andrew S. Jacob
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