

1 **PATRICK J. SZYMANSKI** (*pro hac vice*)
2 **PATRICK J. SZYMANSKI, PLLC**
3 1900 L Street, NW, Ste 900
4 Washington, DC 20036
5 Telephone: (202) 721-6035
6 szymanski@msn.com

SUSAN MARTIN (AZ#014226)
JENNIFER KROLL (AZ#019859)
MARTIN & BONNETT, P.L.L.C.
1850 N. Central Ave. Suite 2010
Phoenix, Arizona 85004
Telephone: (602) 240-6900
smartin@martinbonnett.com
jkroll@martinbonnett.com

6 **BRIAN J. O'DWYER** (*pro hac vice*)
7 **GARY SILVERMAN** (*pro hac vice*)
8 **JOY K. MELE** (*pro hac vice*)
9 **O'DWYER & BERNSTIEN, LLP**
10 52 Duane Street, 5th Floor
11 New York, NY 10007
12 Telephone: (212) 571-7100
bodwyer@odblaw.com
gsilverman@odblaw.com
jmele@odblaw.com

13 Attorneys for US Airline Pilots Association

14 **IN THE UNITED STATES DISTRICT COURT**
15 **DISTRICT OF ARIZONA**

17 ADDINGTON et. al.,)
18)
19 *Plaintiffs,*)
20 v.)
21 US AIRLINE PILOTS ASS'N, et. al,)
22)
23 *Defendants.*)

Case No.: CV-13-00471-PHX-ROS
**Notice of Service of US Airline Pilots
Association's Proposed Stipulation of
Facts**

24 Defendant US Airline Pilots Association ("USAPA") hereby provides notice that
25 on May 29, 2013 USAPA served on Plaintiffs and Defendant US Airways, Inc. by email
26 the proposed stipulation of facts attached hereto as Exhibit A.¹
27

28 ¹ Consistent with the Court's directive at the May 14, 2013 hearing, USAPA served facts relating to the application for preliminary injunction occurring after the Court's

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Respectfully submitted his 29th day of May, 2013.

Martin & Bonnett, P.L.L.C.

By: s/ Susan Martin
Susan Martin
Jennifer L. Kroll
Martin & Bonnett
1850 N. Central Ave., Suite 2010
Phoenix, AZ 85004

Patrick J. Szymanski (pro hac vice)
Patrick J. Szymanski, PLLC
1900 L Street, NW, Suite 900
Washington, DC 20036

Brian J. O'Dwyer (pro hac vice)
Gary Silverman (pro hac vice)
Joy K. Mele (pro hac vice)
O'Dwyer & Bernstien, LLP
52 Duane Street, 5th Floor
New York, NY 10007

Attorneys for US Airline Pilots Association

October 2012 decision and order in the Declaratory Judgment Action, supplemented by significant background facts. USAPA reserves the right to submit and/or propose additional facts in the event the Court determines to address the merits of plaintiffs' claims. Moreover, in the event that the Court denies USAPA's motion to dismiss, USAPA reserves its right to take discovery on the merits of Plaintiffs' claims.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I hereby certify that on May 29, 2013, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

Marty Harper
Andrew S. Jacob
Jennifer Axel
Polsinelli, PC
CityScape
One East Washington St., Ste. 1200
Phoenix, AZ 85004

Attorneys for Plaintiffs

US Airways, Inc.
Karen Gillen
111 West Rio Salado Parkway
Tempe, AZ 85281

Robert A. Siegel
Chris A. Hollinger
400 South Hope Street, Suite 1500
Los Angeles, CA 90071-2899

Attorneys for US Airways, Inc.

s/T. Mahabir