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9 *Attorneys for Intervenors*
10 *AMR Corporation and American Airlines, Inc.*

11 UNITED STATES DISTRICT COURT
12 FOR THE DISTRICT OF ARIZONA

13
14 Don ADDINGTON; John BOSTIC; Mark
BURMAN; Afshin IRANPOUR; Roger
15 VELEZ; Steve WARGOCKI; Michael J.
SOHA; Rodney Albert BRACKIN; and
16 George MALIGA, on behalf of themselves
and all similarly situated former America
17 West pilots,

18 Plaintiffs,

19 vs.

20 US AIRLINE PILOTS ASS'N, an
unincorporated association; and US
21 AIRWAYS, INC., a Delaware Corporation,

22 Defendants.

Case No. CV-13-00471-PHX-ROS

Judge Roslyn O. Silver

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25 **PUTATIVE INTERVENORS**
AMR CORPORATION'S AND AMERICAN AIRLINES, INC.'S
26 **SUPPLEMENTAL MEMORANDUM REGARDING INJUNCTIVE RELIEF**
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1 American Airlines, Inc., and its parent company, AMR Corporation (collectively
2 “American”) previously filed an Application for Intervenor status in this litigation. DOCKET
3 NO. 56. American sought that status in order to highlight the fact that, should Plaintiffs prevail,
4 equitable relief entered in this case might inadvertently interfere with the obligations and rights of
5 Defendants US Airways, Inc., and US Airline Pilots Association (“USAPA”), as well as those of
6 American and its pilots’ union, the Allied Pilots Association (“APA”), memorialized in a
7 Memorandum of Understanding (“MOU”), which was, at the time, pending approval of the
8 Bankruptcy Court in the Southern District of New York. In particular, American expressed the
9 concern that equitable relief in this action could interfere with the timetables and processes of the
10 merger-related seniority integration process.

11 As explained in American’s Application, the efficiencies and synergies contemplated by
12 the merger between American and US Airways depend on the four parties to the MOU
13 commencing and completing the pilot seniority integration process on the strict timetable
14 bargained for in that Agreement. Those efficiencies and synergies lie at the heart of the proposed
15 Plan of Reorganization currently pending approval in American’s Chapter 11 case. No party has
16 opposed American’s Application to Intervene. It is now ripe for decision.

17 American files this Supplemental Memorandum to advise the Court that on Thursday,
18 May 30, 2013, the Bankruptcy Court approved the MOU. A copy of the Bankruptcy Court’s
19 Order is attached hereto as Exhibit A. Although the MOU remains contingent on the
20 consummation of the merger, it is otherwise a final and enforceable agreement of the parties with
21 respect to those procedural aspects of the MOU’s seniority process.

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1 DATED: June 3, 2013

/s/ Todd C. Duffield
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14 **CERTIFICATE OF SERVICE**

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16 I hereby certify that on this 3rd day of June, 2013, I electronically transmitted PUTATIVE
17 INTERVENORS AMR CORPORATION'S AND AMERICAN AIRLINES, INC.'S
18 SUPPLEMENTAL MEMORANDUM REGARDING INJUNCTIVE RELIEF to the U.S. District
19 Court Clerk's Office by using the ECF System for filing and transmittal.

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22 By: /s/ Todd C. Duffield
Todd C. Duffield