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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

Case No.: 2:13-CV-00471-ROS

ADDINGTON et. al.,)
)
21 *Plaintiffs,*)
)
22 v.)
)
23 US AIRLINE PILOTS ASS'N, et. al,)
)
24 *Defendants.*)
25)
26)

SUPPLEMENTAL DECLARATION
OF JESS PAULEY

1 Jess Pauley declares as follows under penalty of perjury pursuant to 28 U.S.C. §
2 1746:

3 1. I am a member of the US Airline Pilots Association (“USAPA”) and Chair
4 of the USAPA Merger Committee, the committee charged with negotiating with respect
5 to integration of seniority with the Allied Pilots Association (“APA”), the union
6 representing the pilots of American Airlines. I am fully familiar with the facts set forth
7 below. I submit this supplemental declaration to apprise the Court of relevant facts that
8 have arisen since filing of the parties’ memoranda on May 28, 2013.

9
10 2. On June 6, 2013, USAPA’s governing body, the Board of Pilot
11 Representatives (“BPR”), approved the appointment of five members to the USAPA
12 Merger Committee, who together with myself as Committee Chairman, will represent US
13 Airways pilots with respect to the integration of seniority with the APA.

14 3. With the new appointments, the USAPA Merger Committee consists of two
15 pilots each from the Philadelphia and Charlotte Domiciles that originated with US
16 Airways prior to the 2005 merger with America West (i.e., “East” pilots) and two pilots
17 from the Phoenix Domicile which originated with America West (i.e., “West” pilots).
18 This ratio matches the overall ratio between East pilots and West pilots at US Airways.

19 4. The members of the USAPA Merger Committee not only represent both
20 East and West pilot groups but are also a representative mix of captains and first officers
21 from the major domiciles in our system.

22 4. The members of the USAPA Merger Committee are as follows:

23 A. Chair, Jess Pauley. I have been a member of the Merger Committee since
24 2010 and the Chairman of the Committee since April 2012. I was Vice Chairman of the
25 Boston Domicile from July 2008 until it closed in March 2010. I am currently an A320
26 First Officer based in Philadelphia.

27 B. Kevin Barry. First Officer Barry previously was a member of the USAir
28

1 Shuttle Negotiation Committee from May 1993 through July 1996, was a member of the
2 USAir Shuttle Merger Committee from 1996 through 1999, and a member of the Joint
3 Negotiating Committee from August 1999 through February 2000, all with respect to the
4 merger of the USAir Shuttle into US Airways. He was also a member of the USAPA
5 Merger Committee from May 2008 through August 2008 and more recently has been
6 supporting the work of the USAPA Merger Committee as a “Subject Matter Expert.”¹
7 He is an A320 First Officer based in Charlotte.
8

9 C. James Calveri. First Officer Calveri has been a member of the Negotiating
10 Advisory Committee (NAC) since April 2012. The NAC is charged with negotiating
11 any collective bargaining or other agreement with the Company. The NAC was
12 responsible for negotiating the Memorandum of Understanding regarding contingent
13 collective bargaining agreement (“MOU”) between US Airways, AMR Corp., USAPA
14 and the APA. He is an A320 First Officer based in Phoenix.

15 D. Robert E. Davison. Captain Davison was a member of the USAPA Merger
16 Committee from June 2008 through April 2010, Chairman of the Committee from April
17 2010 through April 2011 and more recently has been supporting the work of the
18 Committee as a “Subject Matter Expert.” He is an A320 Captain based in Philadelphia.

19 E. Tom Kubik. Captain Kubik has served as Assistant Chief Pilot, a Senior
20 Check Airman and as the Chairman of the USAPA Safety Committee. He is an A330
21 Captain based in Charlotte.
22

23 F. Ken Stravers. Captain Stravers was the Chairman of the America West
24 Merger Committee during the Air Line Pilots Association (“ALPA”) seniority integration
25 proceeding that led to the Nicolau Award. He is an A320 Captain based in Phoenix.

26 4. The USAPA Merger Committee will begin meeting this coming week in


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28 ¹ A “Subject Matter Expert” is a pilot who is not an official member of a certain
committee, yet, upon said committee’s request, occasionally consults on subjects in
which the pilot is knowledgeable.

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Washington, D.C.

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

Executed this 7th day of June, 2013.



JESS PAULEY

CERTIFICATE OF SERVICE

I hereby certify that on June 7, 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:

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s/J. Kroll