

EXHIBIT M

DON ADDINGTON, ET AL. vs. US AIRLINE PILOTS ASS'N, ET AL.

Confidential

William Jess Gordon Pauley, Jr. on 09/18/2013

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1 the dispute.

2 Q. Isn't it true that the USAPA merger
3 committee's going to present a seniority list for all
4 the US Airways pilots and use that list to integrate
5 with the list for the American pilots?

6 A. Yes.

7 Q. Okay. How is the USAPA merger committee
8 going to create that list?

9 A. USAPA merger committee will determine a
10 proposal to recommend to the Board of Pilot
11 Representatives. Through analysis we'll describe
12 to the BPR, the Board of Pilot Representatives what
13 we believe to be the most advantageous position to
14 take in negotiations and arbitration necessary.

15 Q. Vis-a-vis integrating with the American
16 lists, but how will the USAPA merger committee create
17 a single seniority list for US Airways pilots?

18 A. That process has not been determined yet.

19 Q. You're the chairman of the merger
20 committee?

21 A. That's correct.

22 Q. And you don't know how the merger committee
23 is going to create a single seniority list for US
24 Airways pilots to use to integrate with American
25 pilots?

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1 Q. Thank you.

2 Just to touch up one point, if your
3 committee made a recommendation to integrate the East
4 and West pilots according to date of hire, a
5 recommendation to the BPR to integrate the East/West
6 pilots by date of hire and there was a dissenting
7 recommendation to integrate them according to the
8 Nicolau award, does the USAPA constitution allow the
9 BPR to accept the dissenting recommendation for the
10 Nicolau?

11 A. I believe the resolutions are voted on by
12 majority rule. So I'm not sure if you need more
13 than that.

14 Q. Does the USAPA constitution allow the BPR
15 to accept and use the Nicolau East/West integration?

16 A. The constitution has objectives, directs
17 for the use of date-of-hire principles with
18 appropriated conditions and restrictions to protect
19 the career expectations of the pilots. I'm
20 paraphrasing, of course, but that's the essence of
21 it, that the Nicolau award would not fit into that
22 description.

23 Q. Did the BPR give your committee an
24 assignment to integrate the East and West pilots in
25 any particular manner?

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1 mentioned, some pilots were advocating vigorously
2 for it and some against it.

3 Q. Why don't you take a look at Exhibit --

4 MR. HARPER: What number is that?

5 MS. AXEL: I think we're on 1073.

6 (Exhibit Number 1073: E-mail string with
7 the top from Jess Pauley to Jacquie Denny
8 dated 10/22/12 marked for identification, as
9 of this date.)

10 Q. 1073.

11 Can you identify this?

12 A. This was a e-mail that was sent to me by
13 I think a fella named Ron Denny, back on
14 October 22nd, 2012.

15 Q. And you answered him, right?

16 A. Yes.

17 Q. Can you read the last paragraph in your
18 answer, please, into the record?

19 A. Again, this was a private discussion
20 apparently between myself and another pilot.

21 Q. It's not private now. So what did you
22 answer him?

23 A. I said the second line here regarding
24 Silver's ruling, she gave us what we expected,
25 USAPA is free to negotiate a seniority list within

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1 the bounds of the duty of fair representation
2 obligations. We are certain there is a non-Nic
3 solution that will meet that standard.

4 Q. What is that non-Nic solution that you were
5 referring to?

6 A. I think, again, there's a wide range of
7 possibilities that would meet that standard.

8 Q. Give me one, please.

9 A. Date of hire with conditions and
10 restrictions.

11 Q. Is there a second one?

12 A. Again, there's a wide -- wide gamut.
13 They could use -- other methodologies have been
14 advocated over the years and have been found to be
15 fair and equitable for negotiation and arbitration.

16 Q. This e-mail talks about a report by Ethan
17 Singer.

18 Do you know what he's talking about?

19 A. Yes.

20 Q. Who is Ethan Singer?

21 A. There is a paper that was produced by
22 Ethan Singer and Darin Lee, and it discussed a way
23 to quantify seniority integration. And the concept
24 is that -- again, somewhat similar to what they
25 rendered in the seniority integration with

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