

EXHIBIT P

**Don Addington vs. US Airline Pilots Ass'n
David Ciabattoni on 09/17/2013**

**CV-13-00471-PHX-ROS
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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA
CASE NO.: CV-13-00471-PHX-ROS

_____)
Don Addington; et al.,)
)
Plaintiffs,)
)
vs.)
)
US Airline Pilots Ass'n, et al.,)
)
Defendants.)
_____)

DEPOSITION OF DAVID E. CIABATTONI
(Taken by Plaintiffs)
Charlotte, North Carolina
Tuesday, September 17, 2013

Reported in Stenotype by
V. Dario Stanziola, CSR (N.J.), RPR, CRR

1 Q. -- there's nothing in the MOU that prevents
2 implementation of the Nicolau list, correct?

3 MR. JACOB: Integration with the --

4 A. I have to look at the MO -- at the MOU
5 again. I'd have to -- that's not my understanding
6 of the MOU.

7 Q. What's your understanding?

8 A. That there's going to be a McCaskill-Bond
9 process and it will be between USAPA and APA -- if
10 there's a McCaskill-Bond process, it will be
11 between USAPA and APA.

12 Q. And USAPA will submit date of hire as their
13 list?

14 A. That's in the constitution and bylaws at
15 USAPA to submit that.

16 Q. Going back to Exhibit 1033. I'd like to
17 talk a little bit about the change in control, scope
18 note number five, about halfway in the document.

19 MR. HARKIN: Can you give a Bates number?

20 MS. AXEL: USAPA 003905.

21 MR. HARKIN: Thank you.

22 A. Okay.

23 Okay.

24 Q. Did you believe that the change in control
25 provision in the East contract had significant value?