

EXHIBIT R

Don R. Addington - 9/10/2013

Page 1

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

DON ADDINGTON, et al.,)
)
 Plaintiffs,) No. CV-13-00471-
) PHX-ROS
 v.)
)
US AIRLINE PILOTS ASS'N,)
et al.,)
)
 Defendants.)
_____)

DEPOSITION OF DON R. ADDINGTON

Phoenix, Arizona
September 10, 2013
12:57 p.m.

REPORTED BY:
Janice Gonzales, RPR, CRR
AZ Certified Court
Reporter No. 50844

Don R. Addington - 9/10/2013

Page 45

1 A. No.

2 (Exhibit 148 previously marked for identification.)

3 BY MS. MELE:

4 Q. I'm handing you what's been previously
5 marked for identification as Defendants' Exhibit 148.
6 Do you recognize this document?

7 A. Yes.

8 Q. Can you identify it, please?

9 A. It's a list of objectives.

10 Q. And to your knowledge, does this include
11 all the objectives of Leonidas?

12 A. Yeah, to my knowledge it does.

13 Q. And do you agree with all of these
14 objectives?

15 A. Yes.

16 Q. Do you know if it is Leonidas' position
17 that it will not accept any other seniority
18 integration list other than the Nicolau award?

19 MS. AXEL: Form. Foundation.

20 THE WITNESS: If it's our position that
21 we will not accept any other list?

22 BY MS. MELE:

23 Q. Any other seniority integration list
24 other than the Nicolau award?

25 A. Yeah, we've said that we will not

Don R. Addington - 9/10/2013

Page 46

1 tolerate the dilution of the award.

2 Q. And by that, is it your understanding
3 that that means that you will not accept any other
4 seniority integration list other than the Nicolau
5 award?

6 MS. AXEL: Form.

7 THE WITNESS: To my knowledge.

8 BY MS. MELE:

9 Q. And is that your position as well?

10 A. Yeah.

11 Q. And is it your position that you will not
12 agree to any changes to the Nicolau list?

13 MS. AXEL: Form.

14 THE WITNESS: Yeah.

15 BY MS. MELE:

16 Q. And do you know if that's the position of
17 all the plaintiffs in this case?

18 A. As far as I know.

19 Q. Have you asked all the plaintiffs?

20 A. Have I asked all of them personally? No.

21 Q. Do you know if that is the position of
22 the entire West class?

23 A. I would say that it is.

24 Q. And how do you know that?

25 A. Just an educated guess.