

EXHIBIT U

David Braid - 8/28/2013

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 DAVID BRAID

Phoenix, Arizona
August 28, 2013
9:21 a.m.

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

1 A. We've already done a neutral process. I
2 don't know why we'd have to do another one.

3 Q. When you say you've already done a
4 neutral process, you did not do a neutral process
5 with USAPA; is that correct?

6 A. Correct.

7 Q. Okay. So what you're saying is, it's
8 Nicolau or nothing; is that right?

9 A. Yes.

10 Q. And you agree that it should be Nic or
11 nothing?

12 A. Yes.

13 Q. So that no effort by USAPA to reach a
14 mutually satisfactory conclusion would be worthwhile
15 unless it culminated in the Nicolau award; is that
16 right?

17 A. Right.

18 Q. So is Nic or nothing any different than
19 my way or the highway? That's your position?

20 MR. JACOB: Form.

21 THE WITNESS: I didn't determine the
22 Nicolau.

23 BY MS. MARTIN:

24 Q. But from your perspective, unless USAPA
25 agreed to Nicolau, it wouldn't be worthwhile for them

1 to engage or attempt to engage the West pilots?

2 MR. JACOB: Asked and answered. You
3 don't have to answer that again.

4 BY MS. MARTIN:

5 Q. Yes, you do.

6 MR. JACOB: No, you don't.

7 MS. MARTIN: If you're going to go to the
8 Court on this, that's fine. But other than that,
9 your objection should be confined to foundation,
10 form.

11 BY MS. MARTIN:

12 Q. You can answer my question. Would you
13 like it repeated? Would you like it repeated?

14 THE WITNESS: I've been told not to
15 answer the question.

16 BY MS. MARTIN:

17 Q. From your perspective, the West pilots
18 will not agree to anything other than Nicolau; is
19 that correct?

20 A. Correct.

21 Q. If USAPA wanted to find a compromise
22 proposal, would there be any value in USAPA
23 attempting to do that?

24 MR. JACOB: Foundation, form.

25 THE WITNESS: No.