

# **EXHIBIT W**

Jeffrey Troy Koontz - 8/26/2013

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF ARIZONA

DON ADDINGTON, et al.,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	No.
	)	CV-13-00471-
US AIRLINE PILOTS ASSOCIATION,	)	PHX-ROS
et al.,	)	
	)	
Defendants.	)	
	)	

DEPOSITION OF JEFFREY TROY KOONTZ

Phoenix, Arizona  
August 26, 2013  
1:17 p.m.

REPORTED BY:  
Robin L. B. Osterode, RPR, CSR  
AZ Certified Reporter No. 50695

1           A.     I don't know. I've just heard other pilots  
2 utter it.

3           Q.     And do you know in what context that phrase  
4 has been used?

5           A.     I have no idea why they're saying that or  
6 what they mean by it.

7           Q.     Is it Leonidas's position that USAPA must  
8 implement the Nicolau list in merging seniority?

9           A.     Yes.

10          Q.     Is it Leonidas's position that they will  
11 not agree to any changes in the Nicolau list?

12          A.     Yes.

13          Q.     Do any actions of Leonidas require approval  
14 of the members?

15          A.     No.

16          Q.     Do any actions of Leonidas require a member  
17 vote?

18          A.     No.

19          Q.     So who decides what actions Leonidas is  
20 going to take?

21          A.     In fulfillment of the corporate objectives,  
22 as the articles of incorporation and bylaws stated,  
23 it technically comes down to the vote of the board of  
24 directors, the member managers.

25          Q.     Okay. And the member managers being