

EXHIBIT Y

Michael Soha - 8/29/2013

Page 1

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

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

DEPOSITION OF MICHAEL SOHA

Phoenix, Arizona
August 29, 2013
9:03 a.m.

REPORTED BY:
Kristy A. Ceton, RPR
AZ Certified Court Reporter No. 50200

1 that; is that correct?

2 A. Yes.

3 Q. Okay. And when was the last time you
4 spoke --

5 Well, let me -- Who was the last
6 displaced captain you spoke with who told you that?

7 A. I work with five people and I could not
8 tell you which one I discussed it with.

9 Q. Have you heard the expression "Nic or
10 nothing"?

11 A. Yes.

12 Q. And what does that mean to you?

13 A. We want the Nicolau enforced.

14 Q. Is that your view?

15 A. Yes.

16 Q. And the "or nothing" part of the "Nic or
17 nothing," what does that mean to you?

18 A. We haven't really even considered losing.

19 Q. When you say that, do you mean that you
20 think it's going to be the Nicolau award?

21 A. Yes.

22 Q. And only the Nicalou award?

23 A. Yes.

24 Q. Would you take anything less than the
25 Nicalou award?

1 A. No.

2 Q. Do you know if there are any West pilots
3 that don't agree with the "Nic or nothing" approach?

4 A. I do not know.

5 Q. Have you asked any West pilots if they
6 would -- don't agree with the "Nic or nothing"
7 approach?

8 A. No.

9 Q. Did you know any of the other named
10 plaintiffs before the lawsuit commenced?

11 A. I knew Rod Brackin and I knew George
12 Maliga.

13 Q. How did you know them?

14 A. Rod has been here since 1986, I believe.
15 And George, I flew with him on the 757 somewhere in
16 the '90s.

17 Q. So both from work?

18 A. Correct.

19 MS. KROLL: Well, I think I'm almost
20 done, but let me take a five-minute break to review
21 my notes and then we'll finish up. Thank you.

22 (A break was taken at 10:22 a.m.)

23 MS. KROLL: We're going to hold the
24 deposition open pending resolution of the document
25 discovery issue that we've been conferring on. And