

EXHIBIT A

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

1 Q. Do you know what percentage of West
2 pilots have contributed to Leonidas?

3 A. I do not.

4 Q. Have you heard of the control group in
5 relation to this litigation?

6 A. I have.

7 Q. And what is your understanding of what
8 the control group is?

9 A. It's people that are not plaintiffs.

10 Q. So you are not a member of the control
11 group?

12 A. No, I would not be.

13 Q. Do you know who the members of the
14 control group are?

15 A. I'm not sure right now.

16 Q. Do you know who any of the members of the
17 control group are?

18 A. I believe Brian Stockdell would be one of
19 them.

20 Q. Anyone else?

21 A. I'm not sure.

22 Q. Meaning you don't know?

23 A. Meaning I don't know.

24 Q. And do you know what the control group
25 does?

1 A. I'm not sure what their specific duties
2 are right now.

3 Q. Do you have any general idea of what they
4 do?

5 A. I couldn't say. I don't know.

6 Q. Do any of the members of the control
7 group communicate with you?

8 A. Well, a lot of us are on the same e-mail,
9 I mean, as far as if that's what you mean by
10 communication.

11 Q. By communication, I mean either in person
12 orally, phone, or e-mail, yes. So that would include
13 e-mail.

14 A. Yeah.

15 Q. And to your knowledge, is the control
16 group involved in this litigation?

17 A. I believe they are.

18 Q. And what is your understanding of what
19 their involvement is?

20 A. I'm not exactly sure what it is
21 specifically.

22 Q. In general?

23 A. I don't know.

24 Q. If a member of the class had a question
25 regarding this litigation, who would he or she

Rodney A. Bracken - 8/27/2013

Page 1

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US AIRLINE PILOTS ASS'N,)
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)
 Defendants.)
_____)

DEPOSITION OF RODNEY A. BRACKIN

Phoenix, Arizona
August 27, 2013
4:17 p.m.

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

1 Q. Do you think that there are -- that it's
2 possible there are West pilots who would be afraid to
3 speak up based on the fact that they might be un- --
4 you know, uninvited to be a buddy or excluded from
5 flying with certain captains?

6 MS. AXEL: Form, foundation.

7 THE WITNESS: I can't imagine that, no.

8 BY MS. MARTIN:

9 Q. To your knowledge, have there ever been
10 any -- aside from the meet and greet that Leonidas
11 has with the lawyers, have there ever been any
12 meetings conducted for the West pilots to debate Nic
13 or nothing versus date of hire with conditions and
14 restrictions?

15 A. No.

16 MS. AXEL: Form, foundation.

17 BY MS. MARTIN:

18 Q. Would you have known about such debates
19 or meetings if they had occurred?

20 A. I think so.

21 MS. MARTIN: Let's -- off the record.

22 (Recessed from 5:30 p.m. to 5:42 p.m.)

23 BY MS. MARTIN:

24 Q. Captain Brackin, have you heard of
25 Addington litigation control group?

1 A. No.

2 Q. Have you participated in discussions with
3 Brian Stockdell?

4 MS. AXEL: Form.

5 THE WITNESS: Yes, on -- on the phone in
6 conference calls and stuff, yes.

7 BY MS. MARTIN:

8 Q. So before when I asked you who besides
9 the named plaintiffs were on the calls, you just
10 mentioned Mr. -- I don't know if it's captain --
11 Koontz and Ferguson. Has Stockdell also been on
12 those calls?

13 A. Yes.

14 Q. What about, I don't know if it's Mr. or
15 Captain Button, has he been on those calls?

16 A. I don't know the answer to that.

17 Q. Do you know who he is?

18 A. Yes.

19 Q. Who is he?

20 A. One of our captains.

21 Q. Is he a member of Leonidas?

22 A. I don't know.

23 Q. Do you know what the MOU is?

24 A. Yes.

25 Q. What is that?

Mark Burman - 9/9/2013

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

DEPOSITION OF MARK E. BURMAN

Phoenix, Arizona
September 9, 2013
6:57 a.m.

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

1 judgement action?

2 A. Yes.

3 Q. Who else?

4 A. I don't recall who they were. I'd have
5 to go back and refresh my memory.

6 Q. Were there any pilots that you wanted to
7 be added as a plaintiff?

8 A. No.

9 Q. Do you know what percentage of West
10 pilots contribute to Leonidas?

11 A. I don't know the exact percentage.

12 Q. Have you heard of a group that's referred
13 to as the Addington control group? May sometimes be
14 known as the control group or the West pilot group,
15 the West pilot control group?

16 MR. JACOB: Form.

17 THE WITNESS: Yes.

18 BY MS. MELE:

19 Q. And what is your understanding of that
20 group?

21 MR. JACOB: Foundation.

22 THE WITNESS: Yeah, my understanding of
23 what they do?

24 BY MS. MELE:

25 Q. Yes.

1 A. I think that they're specifically
2 picked -- I don't know. I'm not sure how to answer
3 that.

4 Q. Well, what do you know about that group?

5 A. I don't know. I'm not sure. I mean, I'm
6 not sure how to answer that.

7 Q. You don't know anything about that group?

8 A. No, I know of the group.

9 Q. So what do you know about the group?

10 A. I know that there's a couple of people
11 that are in a Leonidas group. I don't know exactly
12 what they do, so I'm not quite sure how to answer
13 the -- the question. I'm not involved in that
14 directly, so I've not -- I don't know exactly what
15 they do.

16 Q. Okay. What do you know about what they
17 do?

18 A. They help with the litigation. They
19 help -- that's basically the easiest way for me to
20 put it, is that they help with the litigation.
21 There's specific people that are -- they're, like,
22 more direct go-to people that help with litigation
23 matters.

24 Q. And do you know who selected those
25 people?

George Gerard Maliga - 8/26/2013

Page 1

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Plaintiffs,)	
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vs.)	No.
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US AIRLINE PILOTS ASSOCIATION,)	PHX-ROS
et al.,)	
)	
Defendants.)	
)	

DEPOSITION OF GEORGE GERARD MALIGA

Phoenix, Arizona
August 26, 2013
9:00 a.m.

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

1	THE WITNESS: I think we've already	11:18:35
2	answered that question.	11:18:36
3	BY MS. MELE:	11:18:37
4	Q. No, I think that was regarding the	11:18:38
5	plaintiffs, whether the plaintiffs have held any	11:18:40
6	meetings with the class or certain portions of the	11:18:43
7	class. So I'm asking if Leonidas does or if it's the	11:18:46
8	same, when you say "plaintiffs," you mean --	11:18:51
9	A. It's one and the same.	11:18:53
10	MR. JACOB: Form.	11:18:54
11	BY MS. MELE:	11:18:55
12	Q. So when we say "plaintiffs," it could also	11:18:55
13	refer to Leonidas?	11:18:57
14	A. No.	11:19:02
15	Q. Okay. So what did you mean when you said	11:19:03
16	it's the same; I believe that's your testimony?	11:19:13
17	A. Then I was in error.	11:19:15
18	Q. Do you believe Leonidas represents the	11:19:17
19	interests of the former America West pilots?	11:20:02
20	A. Yes.	11:20:08
21	Q. Do you know what percentage of the former	11:20:12
22	America West pilots contribute to Leonidas?	11:20:27
23	A. I do not know.	11:20:31
24	Q. Have you heard of the Addington control	11:20:32
25	group?	11:20:44

1	A.	No, I have not.	11:20:45
2	Q.	You are aware that there were several road	11:20:48
3		shows concerning the MOU, prior to the ratification	11:21:00
4		vote. Correct?	11:21:04
5	A.	Yes.	11:21:05
6	Q.	Did you attend any of the road shows?	11:21:06
7	A.	Not in person.	11:21:09
8	Q.	Why not?	11:21:11
9	A.	I was working.	11:21:16
10	Q.	Were you ever told not to attend any of	11:21:18
11		them --	11:21:24
12	A.	No.	11:21:24
13	Q.	-- or encouraged not to attend?	11:21:24
14	A.	No.	11:21:28
15	Q.	Do you know if information was provided to	11:21:29
16		the attendees at the road shows?	11:21:39
17	A.	I don't know.	11:21:41
18	Q.	I believe you said earlier that you have	11:21:44
19		read the MOU. Correct?	11:21:52
20	A.	Yes.	11:21:53
21		MS. MELE: Okay. Can you mark this	11:21:55
22		Defendants' Exhibit 133.	11:22:14
23		(Marked for identification Exhibit 133.)	11:22:14
24		BY MS. MELE:	10:50:52
25	Q.	You've just been handed what's just been	10:50:52

Michael Soha - 8/29/2013

Page 1

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 Plaintiffs,)
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 US AIRLINE PILOTS ASSOCIATION,)
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)
 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 A. No.

2 Q. Have you had any experience in what you
3 would describe as a leadership role?

4 A. No.

5 (A break was taken at 9:59 a.m.)

6 Q. BY MS. KROLL: Captain Soha, do you know
7 what the litigation control group is?

8 A. No.

9 Q. So I take it, then, you're not a member
10 of the litigation control group?

11 A. No.

12 Q. Are you a member of Leonidas?

13 A. Not that I'm aware.

14 Q. Do you know how someone becomes a member
15 of Leonidas?

16 A. No.

17 Q. Do you know if Leonidas represents
18 anyone?

19 A. No, I do not know.

20 Q. What is Leonidas, if you know?

21 MR. JACOB: Do you know?

22 THE WITNESS: No, I don't. It's a group.

23 Q. BY MS. KROLL: I'm going to guess from
24 your prior answer that I know the answer to this, but
25 do you post on any websites?