

# EXHIBIT B

Brian Stockdell - 8/26/2013

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 BRIAN STOCKDELL

Phoenix, Arizona  
August 26, 2013  
1:18 p.m.

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

1 West pilots to vote to ratify the MOU?

2 MS. AXEL: Form. Are we talking about a  
3 decision by Leonidas?

4 MS. MARTIN: Yes.

5 THE WITNESS: Yes.

6 BY MS. MARTIN:

7 Q. And do you agree with the statement that  
8 you just read?

9 A. Yes.

10 (Exhibit 160 was marked for identification.)

11 BY MS. MARTIN:

12 Q. I'm showing you a document that's been  
13 marked as Exhibit 160 with Bates numbers WP017903  
14 entitled, "Leonidas Update February 14, 2013." Have  
15 you seen this document before?

16 A. Yes.

17 Q. Did you help to write or edit this  
18 document?

19 MS. AXEL: Form.

20 THE WITNESS: Yes.

21 BY MS. MARTIN:

22 Q. Was it the writing part or the editing  
23 part?

24 A. Probably both.

25 Q. What is the Addington litigation control

1 group?

2 MS. AXEL: Foundation.

3 THE WITNESS: It is simply a subset of  
4 the members and plaintiffs that are associated with  
5 Leonidas.

6 BY MS. MARTIN:

7 Q. I'm sorry, could you raise your voice.

8 A. It is a subset of Leo- -- of the members  
9 and plaintiffs involved in the litigation.

10 Q. When you say "members," you're talking  
11 about the members of Leonidas?

12 A. Uh-huh.

13 Q. Okay. Which members of Leonidas are part  
14 of the control group?

15 MS. AXEL: Form.

16 THE WITNESS: Myself, George Maliga,  
17 Johan de Vicq, Eric Ferguson, Jeff Koontz, Dave  
18 Button, Roger Velez.

19 BY MS. MARTIN:

20 Q. And do you have meetings amongst this  
21 control group?

22 A. No.

23 Q. Do you have conference calls amongst the  
24 control group?

25 A. Yes.

1 telephone calls.

2 BY MS. MARTIN:

3 Q. You were a member of a control group that  
4 made a decision to commence this lawsuit?

5 MS. AXEL: Form. Mischaracterizes  
6 testimony.

7 THE WITNESS: I guess.

8 BY MS. MARTIN:

9 Q. When was the decision made to bring this  
10 lawsuit?

11 A. I believe it was decided on the day that  
12 it was filed.

13 Q. Excuse me?

14 A. On the day it was filed.

15 Q. And prior to filing, when was the first  
16 discussion anybody had regarding bringing this  
17 lawsuit?

18 A. I'm not sure how to answer that.

19 Q. When was the first discussion you had or  
20 participated in regarding bringing this lawsuit?

21 A. This lawsuit, would have to be that day  
22 that it was filed.

23 Q. Well, was there any discussion regarding  
24 bringing a lawsuit after the MOU was ratified?

25 A. If circumstances dictated it.

Afshin Iranpour - 9/6/2013

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 AFSHIN IRANPOUR

Phoenix, Arizona  
September 6, 2013  
9:05 a.m.

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

1 BY MS. KROLL:

2 Q. You don't know what that is today?

3 A. I'm not -- I'm not sure what you're  
4 asking as far as controlling the -- the litigation.

5 Q. Okay. Who sets the legal strategy for  
6 this litigation?

7 A. That is the collective group.

8 Q. Who's the collective group?

9 A. Plaintiffs and other members within  
10 Leonidas.

11 Q. Which other members within Leonidas?

12 A. I can't name all of them right now. I'm  
13 sure I'll skip some if I -- if I try to, but the  
14 information is on -- I believe on our website.

15 Q. Which information are you -- well, can  
16 you -- please name the ones you can remember at this  
17 time.

18 A. Okay. Sure. Would you like me to also  
19 name all the plaintiffs?

20 Q. No, I know who the plaintiffs are. Thank  
21 you.

22 A. Okay. So in addition to the plaintiffs,  
23 we have Eric Ferguson, Jeff Koontz, David Button,  
24 Brian Stockdell, Johan de Vicq, Patrick O'Neill,  
25 maybe David Simmons, and that's all I can think of

1 right now.

2 Q. Okay. And when you said the information  
3 about these people is on the website, what  
4 information were you referring to?

5 A. No, what I said was that information that  
6 you're looking for, as far as who Leonidas people  
7 are, may be on our website.

8 Q. Okay. So you were referring just to the  
9 Leonidas members in general?

10 A. Correct.

11 Q. Okay. So if I showed you a document,  
12 that might help refresh your recollection?

13 A. Let's see the document and we'll go from  
14 there.

15 Q. Okay.

16 MR. JACOB: What number are you looking  
17 for?

18 MS. KROLL: 163.

19 (Exhibit 163 previously marked for identification.)

20 BY MS. KROLL:

21 Q. You have in front of you what's been  
22 marked Exhibit 163, and it's a document that has a  
23 Bates number in the lower right-hand corner of  
24 WP001827.

25 A. Correct.