

# EXHIBIT B

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**From:** Marty Harper <MHarper@Polsinelli.com>  
**Sent:** Friday, October 18, 2013 10:23 AM  
**To:** szymanski@msn.com; Andy Jacob; Jennifer Axel; Siegel, Bob; Hollinger, Chris  
**Cc:** 'O'Dwyer, Brian'; 'O'Dwyer, Brian'; 'Silverman, Gary'; Susan Martin; Jennifer Kroll; Davina James  
**Subject:** RE: Addington v USAPA

Pat, as a follow-up to yesterday's call with the Court, please let me know what I can do to make sure that Captain Hummel's participation by phone is as free of as much stress for him as we can make it. I have reviewed your recent pleading re the possible areas of testimony and have the following observations.

1. Appointments to Merger Committee. If he stays within the scope of what he said in his depo, then I most likely do not need to press him further.
2. Meeting and calls with Airways officials re MB discussions in 7/12 and the initial group sessions in Dallas. If he stays consistent with what he said in his depo about 7/12 discussions, then I will not have any need to press further. If he stays consistent with what Colello says Siegel said at the initial group sessions in December, then I no need to go further.
3. Discussion/directives to Nac and others re various paragraphs on MOU. If he says anything beyond what he said in his depo and that generally was that he was around for support and left the actual details up to you, etc., then I will need to cross him on cross. My read of his depo is that he took himself out of this area for the most part and if he now wants to change that I will need to cross him on it.
4. Composition of merger committee. Plenty of others have given their opinion on that so I don't see why he needs to say more. If he does, I will need to press him to explain/defend himself on this point. Personally, I think enough has already been said so I don't see why he needs to jump in now.
5. Legitimate union purpose. If he goes beyond what he said a pp 154-55 of his depo, I will need to explore in depth.
6. BPR authority. It's already in USAPA docs that are exhibits and Pauley has testified about it. If he says things that are consistent with what the docs say and what Pauley has testified about, then no need to explore much further with him. He has also written in several messages what the Merger Committee has been instructed to do in the MB merger process. If his testimony is consistent with what he wrote earlier this year then I can leave that portion of his testimony alone.
7. Change of control. Will need to cross him on this if his testimony is going to be anything like what you wrote yesterday on p. 4 for doc 229.
8. Same with NMB and "reasons" for MOU.
9. Matters in Dallas. No issue if he stays consistent with his 9/17 depo testimony.

I am available at any time between now and Tuesday am to discuss things further. If you can provide me with a more specific list of the questions you intend to seek his testimony on, I will rewire quickly and let you know my reaction. Thanks and I look forward to hearing from you.

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**From:** Patrick Szymanski [<mailto:szymanski@msn.com>]  
**Sent:** Thursday, October 17, 2013 12:27 PM

**To:** Marty Harper; Andy Jacob; Jennifer Axel; Siegel, Bob; Hollinger, Chris  
**Cc:** 'O'Dwyer, Brian'; 'O'Dwyer, Brian'; 'Silverman, Gary'; 'Martin, Susan'; 'Kroll, Jennifer'  
**Subject:** Addington v USAPA

Counsel,

Dr Thomas Gleason who was the surgeon who performed bypass surgery on Capt Hummel is available for a call during the next 45 minutes. He is in surgery all day tomorrow. We are contacting the Court.

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