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17 Attorneys for US Airline Pilots Association

18 **IN THE UNITED STATES DISTRICT COURT**
19 **DISTRICT OF ARIZONA**

20 Don Addington, *et. al.*,
21 *Plaintiffs,*
22 v.
23 US Airline Pilots Association, *et. al.*,
24 *Defendants.*

Case No.: CV-13-00471-PHX-ROS

**Declaration of Patrick J. Szymanski
submitted in Opposition to US
Airways' Motion for Summary
Judgment**

SUSAN MARTIN (AZ#014226)
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1 PATRICK J. SZYMANSKI, declares as follows under penalty of perjury
2 pursuant to 28 U.S.C. § 1746:
3

4 1. I am lead counsel for Defendant US Airline Pilots Association
5 (“USAPA”) in this action.

6 2. Annexed hereto as Exhibit “1” is a true and correct copy of the 2009
7 ALPA Merger Policy.

8 3. Annexed hereto as Exhibit “2” is a true and correct copy of the UAL-CAL
9 Seniority Integration Decision.

10 4. Annexed hereto as Exhibit “3” are true and correct copies of excerpts of the
11 Deposition Transcript of Stephen Bradford, dated September 18, 2013.

12 5. Annexed hereto as Exhibit “4” are true and correct copies of excerpts of the
13 Deposition Transcript of Gary Hummel, dated September 17, 2013.

14 6. Annexed hereto as Exhibit “5” are true and correct copies of excerpts of the
15 Deposition Transcript of William Jess Pauley, dated September 18, 2013.

16 7. Annexed hereto as Exhibit “6” are true and correct copies of excerpts of the
17 Deposition Transcript of Steve Crimi, dated September 19, 2013.

18 8. Annexed hereto as Exhibit “7” are true and correct copies of excerpts of the
19 Deposition Transcript of Paul Diorio, dated September 20, 2013.

20 9. Annexed hereto as Exhibit “8” is a true and correct copy of the USAPA
21 Constitution and ByLaws.

22 10. Annexed hereto as Exhibit “9” are true and correct copies of excerpts of the
23 Trial Testimony of William Jess Pauley, dated October 23, 2013.

24 11. Annexed hereto as Exhibit “10” are true and correct copies of excerpts of
25 the Trial Testimony of Robert E. Davison, dated October 23, 2013.

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I declare under penalty of perjury that the foregoing is true and correct.
Executed on November 13, 2013, in Washington D.C.

s/Patrick J. Szymanski
PATRICK J. SZYMANSKI

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2 **CERTIFICATE OF SERVICE**

3 I hereby certify that on November 13, 2013, I electronically transmitted the
4 attached document to the Clerk's Office using the CM/ECF System for filing and
5 transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

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28
s/J. Kroll