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17 Attorneys for Intervenor
18 US AIRWAYS, INC.

19 **IN THE UNITED STATES DISTRICT COURT**
20 **FOR THE DISTRICT OF ARIZONA**

21 Don Addington; John Bostic; Mark
22 Burman; Afshin Iranpour; Roger Velez;
23 Steve Wargoeki; Michael J. Soha;
24 Rodney Albert Brackin; and George
25 Maliga, on behalf of themselves and all
26 similarly situated former America West
27 Pilots,

28 Plaintiffs,

vs.

US Airline Pilots Ass'n, an
unincorporated association,

Defendant.

US Airways, Inc.

Intervenor.

Case No. 2:13-cv-00471-ROS

**DECLARATION OF ROBERT A.
SIEGEL IN SUPPORT OF
INTERVENOR US AIRWAYS, INC.'S
MOTION TO CORRECT COURT'S
JUDGMENT PURSUANT TO
FEDERAL RULE OF CIVIL
PROCEDURE 60(A) AND TO MODIFY
COURT'S ORDER PURSUANT TO
RULES 52(B) AND 59(E)**

1 I, Robert A. Siegel, declare and state as follows:

2 1. I am an attorney and a partner with the firm of O'Melveny & Myers LLP,
3 counsel of record for Intervenor US Airways, Inc. ("US Airways") in this action. I have
4 been admitted *pro hac vice* in this matter. I submit this declaration in support of
5 Intervenor US Airways, Inc.'s Motion To Correct Court's Judgment Pursuant To Federal
6 Rule Of Civil Procedure 60(A) And To Modify Court's Order Pursuant To Rules 52(B)
7 And 59(E).

8 2. Attached as Exhibit A to this Declaration is a true and correct copy of
9 relevant excerpts from the arbitration decision in *In The Matter Of The Seniority*
10 *Integration Arbitration Between The Pilots Of Northwest Airlines, Inc. And The Pilots Of*
11 *Delta Air Lines, Inc.*, dated December 8, 2008.

12 3. Attached as Exhibit B to this Declaration is a true and correct copy of
13 relevant excerpts from the arbitration decision in *In The Matter Of The Seniority*
14 *Integration Arbitration Between The Pilots Of Continental Airlines And The Pilots Of*
15 *United Air Lines*, dated September 3, 2013.

16 4. Attached as Exhibit C to this Declaration is a true and correct copy of
17 relevant excerpts from the arbitration decision in *In The Matter Of The Seniority List*
18 *Integration Arbitration Under Allegheny-Mohawk Labor Protective Provisions . . . Among*
19 *And Between The Pilots Of Republic Airline/Chautauqua Airlines/Shuttle America, et al.*,
20 dated February 19, 2011.

21 5. Attached as Exhibit D to this Declaration is a true and correct copy of the
22 Allied Pilots Association Seniority Integration Committee's ("APA SIC") Seniority
23 Integration Protocol Agreement Proposal, dated January 17, 2014. The APA SIC has
24 since submitted a modified proposal, dated February 5, 2014, but that proposal is
25 substantially the same as the original proposal with respect to the provisions that are cited
26 in US Airways' Motion.

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