

1 Marty Harper (003416)  
2 [marty.harper@asualumniawgroup.org](mailto:marty.harper@asualumniawgroup.org)  
3 Kelly J. Flood (019772)  
4 [kelly.flood@asualumniawgroup.org](mailto:kelly.flood@asualumniawgroup.org)  
5 ASU ALUMNI LAW GROUP  
6 Two North Central, Ste. 1600  
7 Phoenix, AZ 85004  
8 Telephone: 602-251-3620  
9 Fax: 602-251-8055

Attorneys for Plaintiffs

10 **IN THE UNITED STATES DISTRICT COURT**  
11 **FOR THE DISTRICT OF ARIZONA**

12 Don Addington; *et al*,  
13 *Plaintiffs*,  
14 vs.  
15 US Airline Pilots Ass’n; and US Airways,  
16 Inc.,  
*Defendants*.

CASE NO. 2:13-CV-00471-ROS  
**MOTION TO SET PROCEDURE  
FOR APPLICATION FOR  
ATTORNEYS’ FEES AND COSTS**

17 Plaintiffs Don Addington, *et al*, move, pursuant to LRCiv. 54.2 for an order setting  
18 procedures to claim fees. This motion is supported by the Memorandum of Points and  
19 Authorities that follows.

20 **MEMORANDUM OF POINTS AND AUTHORITIES**

21 The local rules provide that “the party seeking an award of attorneys' fees and  
22 related non-taxable expenses shall file and serve a motion for award of attorneys' fees and  
23 related non-taxable expenses within fourteen (14) days of the entry of judgment in the  
24 action with respect to which the services were rendered.” LRCiv. 54.2(b). Plaintiffs file  
25 this motion asking for more time to make this application.

26 Plaintiffs here seek an award of approximately \$4,000,000.00 of fees and expenses  
27 incurred defending their seniority rights in a series of litigations that began in 2008.  
28 Plaintiffs are entitled to such an award under common benefit doctrine because this



**CERTIFICATE OF SERVICE**

I hereby certify that on September 22<sup>nd</sup>, 2015, I electronically filed the foregoing with the Clerk of the Court and electronically served a copy of the same upon all parties by using the CM/ECF system. In addition, I transmitted the foregoing via email and US Mail Service to the following:

Susan Martin  
Jennifer Kroll  
MARTIN & BONNETT, PLLC  
1850 N. Central Ave., Ste. 2010  
Phoenix, AZ 85004  
[smartin@martinbonnett.com](mailto:smartin@martinbonnett.com)  
[jkroll@martinbonnett.com](mailto:jkroll@martinbonnett.com)  
Attorneys for US Airline Pilots Association

Patrick J. Szymanski  
PATRICK J. SZYMANSKI, PLLC  
1900 L Street, NW, Ste. 900  
Washington, DC 20036  
[szymanskip@msn.com](mailto:szymanskip@msn.com)  
Attorneys for US Airline Pilots Association

Brian J. O'Dwyer  
Gary Silverman  
Joy K. Mele  
O'DWYER & BERNSTIEN, LLP  
52 Duane Street, 5<sup>th</sup> Floor  
New York, NY 10007  
[bodwyer@odblaw.com](mailto:bodwyer@odblaw.com)  
[gsilverman@odblaw.com](mailto:gsilverman@odblaw.com)  
[jmele@odblaw.com](mailto:jmele@odblaw.com)  
Attorneys for US Airline Pilots Association

Roland P. Wilder, Jr.  
BAPTISTE & WILDER, PC  
1150 Connecticut Avenue, NW, Ste. 315  
Washington, DC 20036  
[rpwilderjr@bapwild.com](mailto:rpwilderjr@bapwild.com)  
Attorney for US Airline Pilots Association

Karen Gillen  
US AIRWAYS INC.  
111 West Rio Salado Parkway  
Tempe, AZ 85281  
[karen.gillen@usairways.com](mailto:karen.gillen@usairways.com)  
Attorneys for Intervenor US Airways, Inc.

1 Robert A. Siegel  
2 O'MELVENY & MYERS LLP  
3 400 South Hope Street, Ste. 1500  
4 Los Angeles, CA 90071-2899  
5 [rsiegel@omm.com](mailto:rsiegel@omm.com)  
6 Attorneys for Intervenor US Airways, Inc.

7 Edgar N. James  
8 JAMES & HOFFMAN, PC  
9 1130 Connecticut Avenue, NW Suite 950  
10 Washington, DC 20036-3904  
11 [www.jamhoff.com](http://www.jamhoff.com)  
12 Attorneys for Allied Pilots Association

13 Stanley Lubin  
14 Lubin & Enoch, P.C.  
15 349 North 4th Avenue  
16 Phoenix, Arizona 85003-1505  
17 [stan@lubinandenoch.com](mailto:stan@lubinandenoch.com)  
18 Local counsel for Allied Pilots Association

19 By: s/Kelly J. Flood

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