

# Exhibit "A" to Jacob Declaration

743

April 30, 2009 - Jury Trial - Day 3 - Testimony of Brian Stockdell

1           What aircraft do you fly?

2     A.   I'm currently a captain on the Boeing 737 based in Phoenix.

3     Q.   Have you been -- during your career with America West  
4     Airlines and now at US Airways, have you flown basically the  
5     same kind of equipment? 15:40:11

6     A.   Well, yes. At America West it's always been the 737.

7     Q.   Mr. Brengle has asked a couple people about the USAPA  
8     seniority proposal and some of the conditions and restrictions.  
9     Have you done some work to take a look at those and try to  
10    understand them? 15:40:32

11    A.   I have looked at it and tried to understand them.

12    Q.   All right. I want to move through this fairly quickly. In  
13    addition to looking at the conditions and restrictions, did you  
14    do some work to compare the Nicolau List with the USAPA date of  
15    hire seniority list? 15:40:55

16    A.   Well, I primarily started trying to understand the  
17    date-of-hire seniority list of USAPA. It was hard to get my  
18    mind around the 136 pages of the seniority list so I was  
19    looking for a way that I could easily comprehend it or maybe  
20    even put it into graphical context so it's easier for both 15:41:15  
21    myself and other people to understand.

22    Q.   And how did you -- what was the base information that you  
23    were working from?

24    A.   I started with USAPA's seniority list that they submitted  
25    to the company and to this court back in October and I started 15:41:31

1 with the Adobe Acrobat file they provided.

2 Q. And what did you do with that Adobe file?

3 A. Well, I didn't have the -- I didn't have the tools at home  
4 to directly upload any of the data out of Adobe Acrobat so I  
5 copied all of the data into a text file. This enabled me to  
6 import data into Microsoft Excel spreadsheet and that allowed  
7 me to set up all the data in nice columns in a spreadsheet  
8 format that was much easier to deal with.

15:41:52

15:42:16

15:42:37

15:42:54

15:43:15

9 Q. Is this the Microsoft cut-and-paste feature where you can  
10 copy something from one document and paste it into another?

11 A. Not exactly. The feature that I had to use to get in there  
12 is an import feature that's called -- in this case it would be  
13 a space delimited file that was imported.

14 Q. When you copied the information into the Excel spreadsheet,  
15 what did you do to make sure that the information in the  
16 spreadsheet had been accurately brought over from the original  
17 document?

18 A. After getting it into the spreadsheet with the columns, of  
19 course, there is some housekeeping that has to be done. For  
20 example, there would be -- some of the rows would be off by a  
21 cell because some pilots would not have a middle initial, so it  
22 moved over one cell. So I had to sort through all of those  
23 type of issues and get all of the data into the proper column.

24 Q. And did you compare it line for line, pilot by pilot so  
25 that you could confirm that the information in this Excel

1 spreadsheet was accurate?

2 A. Not line for line. I did it on a basis of the process  
3 itself. You could easily do sorts to find out where the  
4 columns were not correct, then put it back into the proper  
5 format. After doing all that then I went and did several spot  
6 checks along the way to make sure that the information had been  
7 properly transferred. 15:43:37

8 Q. Did you have to do anything with the data other than list  
9 it and neaten it up?

10 A. To import it into Excel, no. 15:43:55

11 Q. And did you apply some kind of color coding to the list?

12 A. Yes, I did.

13 Q. What did you use or what was the purpose of using color  
14 coding for different groups of pilots?

15 A. Well, a lot of people have been talking about how the West  
16 Pilots were all stapled to the bottom of the list and how, oh,  
17 we have a great -- the West Pilots have great opportunities  
18 based on date of hire for anything on the East, and it's just a  
19 lot of confusion, and so what I did is I -- I played with  
20 different colors but ultimately I colored the East Pilots, the  
21 active East Pilots, in red, filling in the cells. The West  
22 Pilots I colored in blue. There's also a large number of East  
23 Pilots on furlough at the time of the merger, and I colored  
24 those in black. 15:44:33

25 Q. And once you did that what was the next step in trying to 15:44:50

1 make a graphic display of the information on this 136 pages of  
2 pilot names?

3 A. I'm -- I've been using Microsoft PowerPoint for a number of  
4 years and I was comfortable transferring that data into

5 PowerPoint. I transferred a column of cells into PowerPoint,  
6 and I did it based on 1,000 pilot blocks. So I ended up with a  
7 little over five blocks of data that I transferred into  
8 PowerPoint and then I just lined them in a column.

15:45:11

9 Q. Again, was this a direct transfer from data in Excel to  
10 PowerPoint?

15:45:39

11 A. Yes.

12 Q. What was the result once you lined up all of the various  
13 blocks?

14 A. It gave a very nice top-to-bottom graphical presentation of  
15 where the pilot groups sat from a -- I'll call it like a  
16 5,000-foot level.

15:45:51

17 Q. Thank you.

18 MR. STEVENS: May I ask the clerk, please, to give me  
19 two more numbers for identification?

20 BY MR. STEVENS:

15:46:03

21 Q. I've had marked, Mr. Stockdell, Exhibits -- Plaintiffs'  
22 Exhibits 512 and 513 for identification. I need to ask you  
23 some questions about that.

24 A. Okay.

25 Q. And I want to ask first about the Nicolau exhibit. Which

15:47:19

1 one is that?

2 A. The Nicolau exhibit is 512.

3 Q. Could you look at that and tell us whether or not that  
4 is -- after you got done with the process that you described,  
5 is that an accurate depiction of the summary of the groups of  
6 pilots that you transferred over from the Excel spreadsheet  
7 which you had gotten from the USAPA seniority list?

15:47:43

8 A. Well, this -- the Nicolau didn't come from the USAPA  
9 seniority list.

10 Q. I apologize. Which list did you --

15:48:01

11 A. I looked first at the USAPA date of hire.

12 Q. Then let's talk about 513 first.

13 A. Okay.

14 Q. All right?

15 Under 513, is this an accurate depiction of the  
16 information that you condensed from the USAPA seniority list?

15:48:10

17 A. Yes, it is.

18 Q. Mr. Stockdell, 512 is the Nicolau List analysis?

19 A. Correct. 512 is Nicolau.

20 Q. I want to talk about 513 for a second.

15:48:41

21 MR. BRENGLE: That's the other one?

22 MR. STEVENS: Yes.

23 MR. BRENGLE: Thank you.

24 MR. STEVENS: Thank you.

25 BY MR. STEVENS:

April 30, 2009 - Jury Trial - Day 3 - Testimony of Brian Stockdell

1 Q. 513, is that the date-of-hire analysis?

2 A. This is the date-of-hire analysis, yes.

3 Q. Did you use the same form of -- or the same process for  
4 reaching these two?

5 A. Yes, I did.

15:48:59

6 Q. Do you believe that -- were you up last night checking all  
7 your numbers?

8 A. Yes, I was.

9 Q. Are you now comfortable that these are a true and accurate  
10 depiction of the 5,000 names on the Nicolau List and on the  
11 date-of-hire list?

15:49:10

12 A. Yes.

13 MR. STEVENS: Your Honor, I would move the admission  
14 of 512 and 513.

15 MR. BREngle: Your Honor, I have no objection to them  
16 as illustrative exhibits at this point but is there -- there's  
17 a reason -- what's the reason for the admission, the offer?

15:49:21

18 THE COURT: Rule 1006, right?

19 MR. STEVENS: Yes, sir.

20 THE COURT: All right.

15:49:42

21 Are you objecting to admission as evidence?

22 MR. BREngle: Well, I think that -- I think I was told  
23 once earlier we knew this was all coming that they were going  
24 to be used as illustrative exhibits, and I have no problem with  
25 that at all.

15:49:54

April 30, 2009 - Jury Trial - Day 3 - Testimony of Brian Stockdell

1 THE COURT: Well --

2 MR. BRENGLE: But substantively, I think Mr. Stevens  
3 and I both agreed that neither of our witnesses, Mr. Stockdell  
4 or Mr. Davison, would be considered experts.

5 THE COURT: You don't have to be an expert to do a -- 15:50:08

6 MR. BRENGLE: I understand. But --

7 THE COURT: And this --

8 MR. BRENGLE: If there's no foundation --

9 THE COURT: Really, it does -- it does -- it looks  
10 like Rule 1006 applies. Obviously, the originals have been 15:50:17  
11 available.

12 MR. BRENGLE: That's not a problem, Judge.

13 THE COURT: Rule 1006 does apply and therefore this is  
14 admissible as evidence.

15 So which document was it again? 15:50:41

16 MR. STEVENS: 512 and 513.

17 THE COURT: All right. Exhibits 512 and 513 are  
18 admitted.

19 MR. STEVENS: And we've made enlargements of those two  
20 so we can ask Mr. Stockdell a few more questions. 15:50:53

21 Can I have 512-A and 513-A?

22 THE DEPUTY CLERK: Okay.

23 BY MR. STEVENS:

24 Q. I'm going to put the identification tag and we'll talk  
25 about the document. So tell me again the Nicolau List is? 15:51:54

1 A. 512.

2 Q. Thank you.

3 I'm going to mark the enlargement as 512-A.

4 And the USAPA date of hire as 513-A.

5 So let me draw your attention, please, to -- counsel, 15:52:28  
6 do you have --

7 MR. BRENGLE: I'm fine.

8 MR. STEVENS: Thank you.

9 BY MR. STEVENS:

10 Q. Let me show you the list and -- is that an enlargement of 15:52:46  
11 the document that is in front of you?

12 A. Yes, it is.

13 Q. All right. On -- you told us, just to review, on the  
14 legend the red was active East Pilots. Was that as of the date  
15 of the merger? 15:53:05

16 A. That's as of the date of the merger, yes.

17 Q. And blue is West Pilots, also on the date of the merger?

18 A. On the date of the merger.

19 Q. And the black furloughed pilots at -- let me just move that  
20 a little forward. 15:53:59

21 We've described the chart. Black is the furloughed  
22 pilots at PID. What is PID?

23 A. Policy inception date. It's a term that's typically  
24 applied to when the merger is consummated.

25 Q. So that would be what date? 15:54:22