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**Admitted pro hac vice*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

AMERICAN AIRLINES FLOW-THRU
PILOTS COALITION, *et al.*,

Plaintiffs,

v.

ALLIED PILOTS ASSOCIATION, *et al.*,

Defendants.

Case No. 3:15-cv-03125-RS

**REPLY DECLARATION OF JEFFREY B.
DEMAINE IN SUPPORT OF DEFENDANT
ALLIED PILOTS ASSOCIATION'S MOTION
IN LIMINE TO EXCLUDE EVIDENCE**

Date: April 19, 2018
Time: 1:30 p.m.
Courtroom: 3 - 17th Floor
Judge: Hon. Richard Seeborg

1 I, Jeffrey B. Demain, hereby declare as follows:

2 1. I am a member of the State Bar of California and am one of the counsel of record for
3 Defendant Allied Pilots Association (“APA”) in the above-captioned case. I make this reply
4 declaration in support of the Reply Memorandum in support of APA’s Motion in Limine to Exclude
5 Evidence, filed herewith.

6 2. The deposition of Wayne Klocke was taken in this case by APA on December 12, 2017.
7 A true and correct copy of excerpts from the reporter’s transcript of that deposition relevant to the
8 reply in support of APA’s Motion in Limine is included as **Exhibit 14** in APA’s Reply Compendium
9 of Exhibits in Support of APA’s Motion in Limine, filed herewith.

10 3. **Exhibit 15** in APA’s Reply Compendium of Exhibits in Support of APA’s Motion in
11 Limine is a true and correct copy of Arbitrator John B. LaRocco’s October 28, 2008 Supplemental
12 Opinion and Award on Remedy in one of the grievances arising under the Flow-Through Agreement,
13 FLO-0903. This document was marked as Deposition Exhibit 1025 in the deposition of Wayne
14 Klocke, and was authenticated by Mr. Klocke at pages 42-43 of his deposition transcript. *See* Exhibit
15 14 (Klocke Depo. RT) at 42:19 – 43:11.

16 I declare under penalty of perjury that the foregoing is true and correct on the basis of my
17 personal knowledge. Executed on March 15, 2018, at San Francisco, California.

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19 /s/Jeffrey B. Demain

20 Jeffrey B. Demain
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