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Allied Pilots Association

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

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

Plaintiff(s),

vs.

ALLIED PILOTS ASSOCIATION, et al.

Defendant(s).

)  
) Case Number: 3:15-cv-03125 RS  
)  
) **ALLIED PILOTS ASSOCIATION'S CASE**  
) **MANAGEMENT STATEMENT AND**  
) **[PROPOSED] ORDER**  
)  
) Date: June 21, 2018  
) Time: 1:30 PM  
) Courtroom 3 - 17th Floor  
) 450 Golden Gate Avenue  
) San Francisco, CA 94102

1 Defendant Allied Pilots Association (“APA”) submits this Case Management Statement  
 2 and Proposed Order pursuant to the Standing Order for All Judges of the Northern District of  
 3 California and Civil Local Rule 16-9 and the Clerk’s Notice of June 6, 2018, Docket No. 132.

4 APA’s counsel attempted to confer with Plaintiffs’ counsel regarding this statement but  
 5 received no response. APA’s counsel first contacted Plaintiffs’ counsel by email on June 4, 2018.  
 6 Thereafter, APA’s counsel left multiple voicemails and sent multiple emails to Plaintiffs’  
 7 counsel, including an e-mail on June 5, 2018, attaching a draft of a Joint Case Management  
 8 Statement for his review and response. Plaintiffs’ counsel did not respond to any of these  
 9 communications. Consequently, APA submits this statement on behalf of itself rather than as a  
 10 joint statement.

# 11 **1. CURRENT STATUS OF CASE**

12 Discovery was completed in this case on December 31, 2017.

13 On February 22, 2018, Defendant filed a motion in limine to exclude certain evidence.  
 14 The motion was fully briefed as of March 15, 2018, and is set to be argued on June 21, 2018.

15 APA believes that its motion, if granted, would substantially reduce the scope of the  
 16 trial in this matter by excluding evidence of a long history of events that APA contends is  
 17 irrelevant to this claims in this case and more prejudicial than probative.

# 18 **2. SCHEDULING**

19 APA proposes the following schedule:

20 Pretrial Conference: One-hundred and twenty (120) days after the Court’s resolution  
 21 of the pending motion in limine.

22 Trial Date: To be set at Pretrial Conference.

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1 **3. TRIAL**

2 Plaintiffs have demanded a jury trial. Plaintiffs previously estimated that the trial  
3 would take four weeks. APA believes the trial will be substantially shorter (one week or less)  
4 if the Court grants its motion its limine.

5 Dated: June 14, 2018.

6 STEVEN K. HOFFMAN  
7 DANIEL M. ROSENTHAL  
8 James & Hoffman, P.C.

9 JEFFREY B. DEMAINE  
10 Altshuler Berzon LLP

11 By: /s/ Jeffrey B. Demain  
12 Jeffrey B. Demain

13 Attorneys for Defendant Allied Pilots Association  
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**[PROPOSED] CASE MANAGEMENT ORDER**

The above CASE MANAGEMENT STATEMENT is approved as the Case Management Order for this case and all parties shall comply with its provisions. [In addition, the Court makes the further orders stated below:]

IT IS SO ORDERED.

Dated:

\_\_\_\_\_  
RICHARD SEEBORG  
UNITED STATES DISTRICT JUDGE