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12 Attorneys for Defendant
Allied Pilots Association

13 *Admitted pro hac vice
14

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

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

20 Plaintiffs,)

21 v.)

22 ALLIED PILOTS ASSOCIATION, *et al.*,)

23 Defendants.)
24)

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

**COMPENDIUM OF REPLY EXHIBITS IN
SUPPORT OF DEFENDANT ALLIED
PILOTS ASSOCIATION’S MOTION FOR
SUMMARY JUDGMENT OR, IN THE
ALTERNATIVE, FOR PARTIAL SUMMARY
JUDGMENT**

Fed. R. Civ. P. 56

Date: April 21, 2016
Time: 1:30 p.m.
Courtroom: 3 - 17th Floor
Judge: Hon. Richard Seeborg

Exhibit number	Name	Sponsor and declaration reference
52	Excerpts from the reporter's transcript from the Arbitration Hearing held on January 15, 2016 before Arbitrator Ira Jaffe	Thomas Duncan Reply Declaration, ¶ 4
53	Email exchange between Brian Smith and Todd Jewett	Neil Roghair Reply Declaration, ¶ 8

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EXHIBIT 52

In The Matter Of:

*IN THE MATTER OF THE SENIORITY INTEGRATION
OF THE PILOTS OF THE NEW AMERICAN AIRLINES*

*Vol. 19
January 15, 2016*



9250 Mosby Street, Suite 201
Manassas, Virginia 20110
(703) 331-0212
office@icrdepos.com
www.icrdepos.com

BEFORE THE MCCASKILL-BOND AMENDMENT

SECTIONS 3 AND 13 ARBITRATION BOARD

DANA E. EISCHEN, IRA F. JAFFE, M. DAVID VAUGHN

- - - - - x
 In the matter of the seniority :
 integration involving the Pilots of :
 :
 NEW AMERICAN AIRLINES :
 - - - - - x

Friday, January 15, 2016

Washington, DC

The meeting in the above-entitled matter recommenced
 on the 15th day of January, 2016, at 9:19 a.m., at the
 Washington Hilton, 1919 Connecticut Avenue, NW, Washington, DC.

ON BEHALF OF THE ALLIED PILOTS ASSOCIATION:

EDGAR JAMES, ESQ.
 DANIEL M. ROSENTHAL, ESQ.
 MARK R. MYERS, ESQ.
 KEITH WILSON
 LARRY ROSSELOT
 ALLISON CLARK
 STEPHANIE BREAM

ON BEHALF OF AMERICAN AIRLINES, INC.:

ROBERT SIEGEL, ESQ.
 PAUL D. JONES, ESQ.
 TRISTAN MORALES, ESQ.

1 ON BEHALF OF THE AMERICAN AIRLINES PILOTS
2 SENIORITY INTEGRATION COMMITTEE:

3 WESLEY G. KENNEDY, ESQ.
4 MARK STEPHENS

5 ON BEHALF OF THE WEST PILOTS MERGER COMMITTEE:

6 JEFFREY R. FREUND, ESQ.
7 ROGER POLLAK, ESQ.
8 JOSHUA B. SHIFFRIN, ESQ.
9 MARTY HARPER, ESQ.
10 RUSS PAYNE

11 ON BEHALF OF THE EAST PILOTS MERGER COMMITTEE:

12 WILLIAM R. WILDER, ESQ.
13 KELLY ISON
14 RICK BROWN
15 PHILIP OSTERHUS

16 ALSO PRESENT: OTHER MEMBERS OF EACH MERGER COMMITTEE

17 AND ALL WITNESSES

18 COURT REPORTER:

19 JOSEPH A. INABNET
20 Inabnet Court Reporting (ICR)
21 9250 Mosby Street, Suite 201
22 Manassas Church, Virginia 20110
(703) 331-0212
office@icrdepos.com

1 MR. POLLAK: Let the record reflect that
2 we didn't use all of our time.

3 ARBITRATOR JAFFE: Fair enough.
4 Congratulations.

5 Our suggestion would be that we conclude
6 the formal phase of the proceeding now, the
7 evidentiary phase, that we meet with lead counsel
8 for all affected parties, as we had mentioned
9 before, to address a number of the lingering process
10 questions, including particularly setting the
11 various schedules that are needed.

12 We're on the record.

13 MR. FREUND: We're on the record.

14 ARBITRATOR JAFFE: Did you want to stay on
15 to or --

16 MR. FREUND: No. I'm happy to go off.

17 ARBITRATOR JAFFE: Okay. I thought I had
18 indicated before that this completes the evidentiary
19 record, but if we hadn't said that, it should be
20 noted at this point.

21 I would like to thank everyone for their
22 courtesy throughout clearly prolonged hearings that

1 can be more than a little bit stressful given the
2 nature of the issues involved.

3 And the Panel wants to thank the court
4 reporter, as well, for what is way beyond yeoman
5 service in terms of supporting the process.

6 Counsel and the Panel, anything further
7 from you folks?

8 ARBITRATOR EISCHEN: And just additional
9 kudos and appreciation for all the administrative
10 work done by Stephanie and Mark and other folks at
11 APA. Thank you.

12 ARBITRATOR JAFFE: Absolutely.

13 Okay. We'll go off the record.

14 (Whereupon, the proceedings in the above-captioned
15 matter were concluded at 2:43 p.m.)

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Confidential

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CERTIFICATE OF REPORTER

I, Joseph A. Inabnet, do hereby certify that the transcript of the foregoing proceedings was taken by me in Stenotype and thereafter reduced to typewriting under my supervision; that said transcript is a true record of the proceedings; that I am neither counsel for, related to, nor employed by any of the parties to the action in which these proceedings were taken; and further, that I am not a relative or employee of any attorney or counsel employed by the parties thereto, nor financially or otherwise interested in the outcome of the action.



Joseph A. Inabnet
Court Reporter

EXHIBIT 53

From: Jewett, Todd F. [<mailto:Todd.Jewett@aa.com>]

Sent: Thursday, December 03, 2015 2:42 PM

To: Smith, Brian

Cc: CONTRACT-COMPLIANCE; Myers, Mark; Hairston, Charles R.; West, Jim; Jones, Rich; Colello, Dean; Holdren, Beth; McIntosh, Alli

Subject: RE: Updated LOS List for LUS E Pilots

The Company's position is CEL pilots were never furloughed from US Airways Mainline service and therefore are not entitled to the Length of Service Adjustment.

Error! Filename not specified.

Todd Jewett-

Senior Manager Labor Relations, Flight

817-967-4837 Office

817-963-5321 Fax

703-587-3583 Cell

4333 Amon Carter Blvd.

MD 5235- Todd Jewett

Fort Worth, TX 76155

Error! Filename not specified.

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From: Smith, Brian [bsmith@alliedpilots.org]
Sent: Tuesday, November 24, 2015 2:29 PM
To: Jewett, Todd F.
Cc: CONTRACT-COMPLIANCE; Myers, Mark; Hairston, Charles R.; West, Jim; Jones, Rich; Colello, Dean; Holdren, Beth
Subject: Re: Updated LOS List for LUS E Pilots

Todd,

I do believe they are all pilots commonly referred to as CEL pilots.

Brian

FO Brian Smith
APA Contract Compliance
Cell: 813-786-6634
EMail: bsmith@alliedpilots.org



From: "Jewett, Todd F." <Todd.Jewett@aa.com>
Date: Tuesday, November 24, 2015 at 12:46 PM
To: Brian Smith <bsmith@alliedpilots.org>
Cc: CONTRACT-COMPLIANCE <CONTRACT-COMPLIANCE@alliedpilots.org>, "Myers, Mark" <mmyers@alliedpilots.org>, "Hairston, Charles R." <chairston@alliedpilots.org>, "West, Jim" <jwest@alliedpilots.org>, "Jones, Rich" <steamjetdrv@gmail.com>, "Colello, Dean" <dcoello@alliedpilots.org>, "Holdren, Beth" <beth.holdren@aa.com>
Subject: RE: Updated LOS List for LUS E Pilots

Is this list entirely comprised of Combined Eligibility List (CEL) pilots who flew for MidAtlantic Airways but previous to such flying at MidAtlantic, were flying at US Airways Wholly Owned Carriers and flowed up to MidAtlantic?



Todd Jewett-
Senior Manager Labor Relations, Flight
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4333 Amon Carter Blvd.
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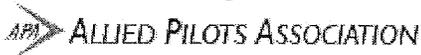
From: Smith, Brian [<mailto:bsmith@alliedpilots.org>]
Sent: Tuesday, November 24, 2015 12:14 PM
To: Jewett, Todd F.
Cc: CONTRACT-COMPLIANCE; Myers, Mark; Hairston, Charles R.; West, Jim; Jones, Rich; Colello, Dean; Holdren, Beth
Subject: Re: Updated LOS List for LUS E Pilots

Todd,

After APA filed the initial LUS East LOS list, a group of pilots contacted APA to express their belief that they had been left off the list in error. After reviewing the issue, APA determined these additional pilots should have been included on the original list.

Brian

FO Brian Smith
APA Contract Compliance
Cell: 813-786-6634
EMail: bsmith@alliedpilots.org



From: "Jewett, Todd F." <Todd.Jewett@aa.com>
Date: Monday, November 23, 2015 at 12:43 PM
To: Brian Smith <bsmith@alliedpilots.org>
Cc: CONTRACT-COMPLIANCE <CONTRACT-COMPLIANCE@alliedpilots.org>, "Myers, Mark" <mmyers@alliedpilots.org>, "Hairston, Charles R." <chairston@alliedpilots.org>, "West, Jim" <jwest@alliedpilots.org>, "Jones, Rich" <steamjetdrvr@gmail.com>, "Colello, Dean" <dcolello@alliedpilots.org>, "Holdren, Beth" <beth.holdren@aa.com>
Subject: RE: Updated LOS List for LUS E Pilots

Brian,

Can you please add a short explanation for this addition of pilots several months after the final list was received by the Company?

Thank you.

Todd

American Airlines 

Todd Jewett-
Senior Manager Labor Relations, Flight
817-967-4837 Office
703-587-3583 Cell

817-963-5321 Fax

4333 Amon Carter Blvd.
MD 5235- Todd Jewett
Fort Worth, TX 76155



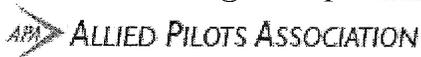
From: Smith, Brian [<mailto:bsmith@alliedpilots.org>]
Sent: Monday, November 23, 2015 11:50 AM
To: Jewett, Todd F.
Cc: CONTRACT-COMPLIANCE; Myers, Mark; Hairston, Charles R.; West, Jim; Jones, Rich; Colello, Dean
Subject: Updated LOS List for LUS E Pilots

Todd,

Two weeks ago, I advised that the Association would be forwarding an updated list of pilots entitled to LOS Credit under the JCBA. I have attached a spreadsheet showing the new list of LUS East pilots in Tab 1 and the Added Pilots in Tab 2. Please advise how the Company intends to handle LOS Credit for these additional pilots. Thanks, and have a great Thanksgiving.

Brian

FO Brian Smith
APA Contract Compliance
Cell: 813-786-6634
EMail: bsmith@alliedpilots.org



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