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5 Attorneys for Plaintiffs AMERICAN AIRLINES
6 FLOW-THRU PILOTS COALITION,
7 GREGORY R. CORDES, DRU MARQUARDT,
DOUG POULTON, STEPHAN ROBSON,
8 and PHILIP VALENTE III on behalf of themselves and all
others similarly situated

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION

12 AMERICAN AIRLINES FLOW-THRU) Case No.: 3:15-cv-03125 RS
13 PILOTS COALITION, Et Al.,)
14 Plaintiffs,) PLAINTIFFS' NOTICE RE AMENDING
vs.) COMPLAINT
15)
16 ALLIED PILOTS ASSOCIATION, Et Al.,)
17 Defendants.)

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19 Plaintiffs state that they will not be seeking to file an amended complaint in this action to
20 challenge the outcome of the Seniority List Integration process, but further state that, their action
21 in not seeking to amend the complaint in this action is without prejudice to filing a new action, or
22 joining in or intervening in another action, challenging the outcome of the Seniority List
23 Integration process as it affects flow-through pilots.

24 Plaintiffs have chosen not to seek to amend the complaint in this action in order to avoid
25 introducing new claims arising from a different and distinct nucleus of facts governing liability,
26 the damages arising from the Seniority Lost Integration process and the resulting integrated
27 seniority list affect a larger class of pilots than the issues concerning Letter G being litigated in
28

1 this case and the relief in a challenge to the Seniority List Integration process would be different
2 than relief that could be awarded in the current action involving Letter G.

3 Plaintiffs are also concerned that, if other pilots were to challenge the Seniority List
4 Integration process—and it presently appears that several pilot groups are investigating challenges
5 to the process—the possibility that courts may seek to consolidate all such challenges into one
6 proceeding could disrupt the process of the current action if the complaint in this action were
7 amended to include a challenge to the Seniority List Integration process on behalf of flow-
8 through pilots.

9 Dated: January 13, 2017.

10 KATZENBACH LAW OFFICES

11 By /s Christopher W. Katzenbach

12 Christopher W. Katzenbach
13 Attorneys for Plaintiffs AMERICAN AIRLINES
14 FLOW-THRU PILOTS COALITION, Et Al.
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