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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Division *[check one]*: San Francisco Oakland San Jose Eureka

James E. Seitz

Case Number: 20-CV-05442-DMR

[Name]

PLAINTIFF _____'s

Plaintiff,

vs.

INITIAL DISCLOSURES *[check one]*

INTERNATIONAL BROTHERHOOD OF

Original

TEAMSTERS, TEAMSTERS LOCAL 986

Supplemental

CHRIS GRISWOLD, PRINCIPLE

Amended

OFFICER LOCAL 986

Defendant.

[See the Instructions for more information about preparing Initial Disclosures.]

INITIAL DISCLOSURES

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1. List of Witnesses

Fill in the table below with the name, and if you know, the address and telephone number of each person whose testimony or written statements you might use to support your claims or defenses. Briefly write a description of what the person knows. Use additional pages as needed.

Name of Person	Person's Address and Telephone Number	Description of what the person knows
Dale Mitchell 320 IBT Chief Steward Airframe Maint.	SFOOV IBT Committee Office (650) 634-5102	Grievance Procedure Article 19 Board of Arbitration Article 20
Mark Des Angles Business Agent IBT Local 986 LAX	453 San Mateo Ave. San Bruno CA 94066 (650) 874-5104	Grievance Procedure Article 19 Board of Arbitration Article 20
Javier Lectora Business Agent Local 856 SFO	453 San Mateo Ave. San Bruno CA 94066 (650) 874-4107	Grievance Procedure Article 19 Board of Arbitration Article 20
Vinnie Graziano IBT Airline Division National Coordinator	Newark NJ 201-838-2014	Grievance Procedure Article 19 Article 20 Board of Arbitration 20 Industry Reset Calculation LOA #29
Peter Hardcastle IBT Pension Actuary Cheiron LLC	Cheiron LLC 8300 Greensboro Dr Suite 800 McLean, VA 22102	2016 and 2108 Industry Reset Calculations and all supporting documentation.
Dan Akins IBT Economist Aikins & Associates	283 Maple St Stowe VT 05672	2016 and 2018 Industry Reset Model calculations and all supporting documents.

INITIAL DISCLOSURES

2. List of Documents and Things

Fill in the table below with a list of each category of documents, electronically-stored information, or other item you may use to support your claims or defenses. For each category, write in its location, such as "plaintiff" or "Dr. Jones, 1234 Street, City." Use additional pages as needed.

<p align="center"><u>Category</u> of Document, Electronically Stored Information, Item, or Tangible Thing</p>	<p align="center"><u>Location</u> of Document, Electronically Stored Information, Item, or Tangible Thing</p>
<p>Collective Bargaining Agreement 2016-22 United Airlines and United Technicians represented by IBT</p>	<p>Article 19 Grievance Procedure Article 20 Board of Arbitration LOA #29 Industry Reset</p>
<p>Industry Reset Model 10-1-2016 presented in 2016 IBT JCBA TA</p>	<p>Model used to show the calculated value of Industry Reset in 2016 T/A 283 Maple St Stowe VT 05672</p>
<p>Industry Reset formula used in 2016 and 2018 Industry Reset</p>	<p>Located on server at the National Mediation Board 1301 K Street, NW, Suite 250 East Washington, DC 20005-7011(202)-692-5000</p>
<p>2016 Industry Reset formual and calculation with all supporting documents.</p>	<p>IBT Airline Division, Washington DC 25 Louisiana Avenue NW Washington DC 20001</p>
<p>2018 Industry Reset formula and calculation with all supporting documents.</p>	<p>IBT Airline Division Washington DC 25 Louisiana Avenue NW Washington DC 20001</p>
<p>2018 Industry Reset formula and calculation with all supporting documents</p>	<p>Dan Akins - Akins and Associates 283 Maple St Stowe VT 05672</p>
<p>2020 Industry Reset formula and calculation with all supporting documents</p>	<p>Dan Akins - Akins and Associates 283 Maple St Stowe VT 05672</p>

1 **3. Plaintiffs/Claimants: Damages Calculation**

2 *List each kind of harm you experienced. For each, calculate the amount owed and how you came*
3 *up with that number.*

4 The plaintiff is asking for no damages from the union, only the rights outlined in the CBA and
5 Railway Labor Act. I want the union to honor my statutory right to proceed to arbitration
6 on my own without support from the union.

7 I request all information and documentation used by the Union for the 2016 and 2018 Industry
8 Reset Calculation as evidence in the arbitration.

9 These requests follow Article 19 and Article 20 of the 2016-2022 United Technicians CBA.

10 The information I am requesting has been stated by the union as public information.

11 **a) Defendants: Liability Insurance**

12 *If you have liability insurance for any of the claims in the lawsuit, write the name of the insurer*
13 *and type of policy below.*

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19 Date: November 17, 2020

Signature: _____

20 Printed name: James E Seitz

21 Pro Se
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INITIAL DISCLOSURES

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