

ATTACHMENT A

UNION OBJECTIONS TO DEBTORS' 1113 TRIAL EXHIBITS

AA EXHIBIT NOS. 100-199		
No.	Exhibit	Objection
100	Declaration of Beverly K. Goulet in Support of American Airlines, Inc.'s Application to Reject Collective Bargaining Agreements Pursuant to 11 U.S.C. § 1113 <sup>1</sup>	¶6 Lack of foundation and misleading
		¶7 Lack of foundation; opinion testimony without adequate foundation
		¶8 Opinion testimony without adequate foundation
		¶10 Opinion testimony without adequate foundation, legal conclusion
		¶26 Opinion testimony without adequate foundation
		¶29 Opinion testimony without adequate foundation
		¶34 Lack of foundation
		¶35 Lack of foundation
		¶43 Hearsay
		¶55 Opinion testimony without adequate foundation, legal conclusion
		¶56 Opinion testimony without adequate foundation, legal conclusions
		¶57 Opinion testimony without adequate foundation
		¶58 Opinion testimony without adequate foundation, legal conclusion
¶60 Opinion testimony without adequate foundation		
¶63 Opinion testimony without adequate foundation, legal conclusion		
103	2011 Labor Costs Per ASM	Misleading
109	AMR Traffic and Revenue Performance	Lack of foundation
114	Mainline Ex-Labor Unit Costs	Lack of foundation
119	AMR Total Adjusted Debt	Lack of foundation
121	Mainline Ex-Fuel Unit Costs	Lack of foundation

<sup>1</sup> It appears that Goulet lacks personal knowledge of the information from records in her custody or control. The Unions reserve the right to object to the admission of the declaration or portions thereof upon the outcome of cross-examination.

122	Labor Cost Per ASM	Lack of foundation
124	AMR Adjusted Debt	Lack of foundation
129A	Projected AMR Total RASM	Relevance
131	New Aircraft Maintenance and Fuel Savings	Relevance
132A	Value of Profit Sharing	Relevance
133	2011 Comparative Costs Ex-Fuel	Lack of foundation
135A	Projected Return to Profitability	Relevance

AA EXHIBIT NOS. 200-299		
No.	Exhibit	Objection
200	Declaration of Visrasb Vahidi in Support of American Airlines, Inc.'s Application to Reject Collective Bargaining Agreements Pursuant to 11 U.S.C. § 1113	¶7 Hearsay, lack of personal knowledge, lack of foundation
		¶8 Hearsay; lack of personal knowledge; opinion testimony without adequate foundation
		¶10 Opinion testimony without adequate foundation
		¶15 Hearsay, misleading, lack of adequate foundation
		¶34 Opinion testimony without adequate foundation
		¶35 Opinion testimony without adequate foundation
		¶38 Hearsay, lack of personal knowledge
		¶45 Opinion testimony without adequate foundation
		¶46 Opinion testimony without adequate foundation
	¶47 Opinion testimony without adequate foundation	
202	American Capacity Vs Other Network Carriers (Indexed To 2003)	Lack of foundation
204	Rest Of System From Accounts Using Hub	Relevance; lack of foundation
205	American's Expanding Global Network	Vague and ambiguous
209	Capacity Growth Rate (ASMs)	Vague and ambiguous
211	Increased Efficiency By Renewing American's Fleet	Vague and ambiguous
213	Peak Day Departures By Equipment Type	Lack of foundation

AA EXHIBIT NOS. 300-399			
No.	Exhibit	Objection	
300	Declaration of David L. Resnick in Support of American Airlines, Inc.'s Application to Reject Collective Bargaining Agreements Pursuant to 11 U.S.C. § 1113	¶¶15-16	Lack of foundation/ vagueness; improper opinion; hearsay
		¶19	Lack of foundation/ vagueness; improper opinion; hearsay
		¶¶21-22	Lack of foundation/ vagueness; improper opinion; hearsay
		¶27	Lack of foundation
		¶41 & nn. 38-42	Lack of foundation/ relevance; hearsay
		¶¶41-43	Lack of foundation, improper opinion; relevance; hearsay
302A	AMR Projected Capital Expenditures Net of Proceeds From Sale Lease Back Transactions	Lack of foundation	
303A	U.S. Airline Industry Passenger Revenues and Year-Over-Year Growth Since 2000	Lack of foundation	
305A	2013E Projected EBITDAR and EBITDAR Margin Compared to Selected Other Airlines	Lack of foundation	
306A	AMR Projected EBITDAR and Margin %	Lack of foundation	
317A	US Airways #1 POR Projections	Lack of foundation; relevance	
318	United Airlines POR Projections	Lack of foundation; relevance	
319	Delta Airlines POR Projections	Lack of foundation; relevance	
320	Northwest Airlines POR Projections	Lack of foundation; relevance	
321A	Other Airlines' POR Projected Adjusted Net Debt (Excluding Pension Underfunding) to EBITDAR	Lack of foundation; relevance	

AA EXHIBIT NOS. 400-499			
No.	Exhibit	Objection	
400	Declaration of Alex Dichter in Support of American Airlines, Inc.'s Application to Reject Collective Bargaining Agreements Pursuant to 11 U.S.C. § 1113	¶6 (a)	Opinion testimony without adequate foundation
		¶6 (b)	Opinion testimony without adequate foundation
		¶6 (c)	Opinion testimony without adequate foundation
		¶6 (d)	Opinion testimony without adequate foundation
		¶6 (e)	Opinion testimony without adequate foundation
		¶9	Opinion testimony without adequate foundation
		¶12	Opinion testimony without adequate foundation; hearsay
		¶13	Lack of adequate foundation
		¶14	Opinion testimony without adequate foundation
		¶15	Opinion testimony without adequate foundation
		¶16 (b)	Opinion testimony without adequate foundation
		¶17	Opinion testimony without adequate foundation
		¶20	Opinion testimony without adequate foundation
		¶24	Opinion testimony without adequate foundation
		¶25	Opinion testimony without adequate foundation
		¶26	Opinion testimony without adequate foundation
		¶27	Opinion testimony without adequate foundation
¶28	Opinion testimony without adequate foundation		
¶29	Opinion testimony without adequate foundation		
¶31	Opinion testimony without adequate		

			foundation
		¶32	Opinion testimony without adequate foundation
		¶33	Opinion testimony without adequate foundation
		¶34	Opinion testimony without adequate foundation
403	2011 Mainline Ex-Fuel Costs per ASM		Lack of foundation

AA EXHIBIT NOS. 500-599			
No.	Exhibit		Objection
500	Declaration of Jeffrey Brundage in Support of American Airlines, Inc.'s Application to Reject Collective Bargaining Agreements Pursuant to 11 U.S.C. § 1113	¶7	Relevance
		¶8	Relevance
		¶10	Relevance; opinion testimony without adequate foundation
		¶11	Opinion testimony without adequate foundation; improper opinion based on hearsay
		¶12	Legal conclusion
		¶13	Speculation/ foundation
		¶14	Facts not in evidence
		¶15	Relevance; hearsay
		¶16	Foundation; hearsay
		¶22	Opinion; conclusory
		¶23	Hearsay
		¶24	Foundation
		¶25	Foundation
		¶26	Speculative; legal conclusion; lack of foundation
		¶27	Relevance
		¶28	Legal conclusion
		¶¶31-36	Foundation; opinion
		¶32	Hearsay; relevance
		¶35	Hearsay
		¶37-38	Relevance
¶39	Legal conclusion		
¶40	Legal conclusion; lack of foundation		
¶45	Mischaracterization; misleading; lack of foundation		
501	DFW Base Blast On Negotiations, February 26, 2011		Authentication; document speaks for itself
503	ORD Base Blast, July 25, 2011		Authentication
505	Terry Maxon, APA Secretary-Treasurer Sends Out His Own Message, November 12, 2009		Hearsay; relevance
507	Cost Reductions Proposed for Employee Groups		Foundation

<b>AA EXHIBIT NOS. 600-699</b>			
<b>No.</b>	<b>Exhibit</b>	<b>Objection</b>	
600	Declaration of Carolyn E. Wright in Support of American Airlines, Inc.'s Application to Reject Collective Bargaining Agreements Pursuant to 11 U.S.C. § 1113	¶7	Improper opinion (based on hearsay)
		n.3	Improper opinion (based on hearsay)
		¶24	Improper opinion (beyond expertise)
		¶38	Improper opinion (based on hearsay)
601	American's Net Per Employee Healthcare Cost Has Nearly Tripled Since 1994	Relevance	
602	American's Per Employee Gross Cost of Healthcare is almost \$2,000 Higher than the Average Jumbo Employer	Hearsay; relevance	
605	American Spends Much More Subsidizing Healthcare Costs than other Jumbo Employers	Hearsay; relevance; vague/ambiguous	
606	Declaration of Larry Chim <ul style="list-style-type: none"> <li>606A: 2011 National Survey of Employer Sponsored Health Plans</li> </ul>	Hearsay; relevance	
609	Declaration of Brant Shelor <ul style="list-style-type: none"> <li>609B: Management Compensation Survey</li> </ul>	Hearsay	

AA EXHIBIT NOS. 700-799			
No.	Exhibit		Objection
700	Declaration of Brian M. McMenemy in Support of American Airlines, Inc.'s Application to Reject Collective Bargaining Agreements Pursuant to 11 U.S.C. § 1113	¶¶13-95	Improper opinion (based on hearsay)
		¶13	Hearsay
701	February 2, 2012 Costing Presentation by Brian M. McMenemy		Hearsay

<b>AA EXHIBIT NOS. 800-899</b>			
<b>No.</b>	<b>Exhibit</b>	<b>Objection</b>	
800	Declaration of Jerrold A. Glass in Support of American Airlines, Inc.'s Application to Reject Collective Bargaining Agreements Pursuant to 11 U.S.C. § 1113	¶42	Vague
		¶129	Lack of foundation
		¶132	Lack of foundation
		¶135	Lack of foundation
		¶279	Lack of foundation
		¶281	Misleading, lack of foundation
		¶285	Opinion testimony without adequate foundation, no personal knowledge
813	TOS Flight Attendant Rates - Domestic - Current Book - 70 hours	Misleading, lack of foundation	
814	TOS Flight Attendant Rates - International - Current Book - 70 hours	Misleading, lack of foundation	
815	TOS Flight Attendant Rates – Domestic - Current Book - 80 hours	Misleading, lack of foundation	
816	TOS Flight Attendant Rates - International - Current Book - 80 hours	Misleading, lack of foundation	

AA EXHIBIT NOS. 900-999			
No.	Exhibit	Objection	
900	Declaration of Dennis Newgren in Support of American Airlines, Inc.'s Application to Reject Collective Bargaining Agreements Pursuant to 11 U.S.C. § 1113	¶7	Lack of foundation/ hearsay
		¶9	Improper opinion
		¶17	Relevance
		¶27	Speculation
		¶41	Speculation
		¶46	Speculation
		¶53	Improper opinion
		¶68	Speculation
		¶¶69-70	Improper opinion
		¶78	Improper opinion
		¶79	Improper opinion
		¶82	Improper opinion
		¶102	Lack of foundation/ hearsay
		¶143	Speculation
		¶149	Speculation
		¶150	Improper opinion
¶157-158	Lack of foundation/ hearsay		
¶167	Improper opinion		
¶178	Speculation		
¶185	Improper opinion		
905	2010 Pilot Cost Per Block Hour Chart	Lack of foundation/hearsay	
910	Terry Maxon, <i>Buzz About Eventual, Possible Bankruptcy At AMR Gets Buzzier</i> , Dallas News Aviation Blog (Sept. 23, 2011)	Hearsay	
911	Ted Reed, <i>AMR Fights to Quell Bankruptcy Fears</i> , The Street (Mar. 31, 2008)	Hearsay	
912	Richard Lehmann, <i>When Bankruptcy is the Best Solution</i> , Forbes.com (Sept. 23, 2005)	Hearsay	
913	APA New York Base Blast, Sept. 14, 2011	Hearsay	
923	Marketing Airline Seat Share By City	Vague/ambiguous; lack of foundation/ hearsay	
924	Daily NYC Departures	Lack of foundation/hearsay	
925	Destinations from NYC Hubs	Lack of foundation/hearsay	
926	Daily Boston Departures	Lack of foundation/hearsay	

<b>AA EXHIBIT NOS. 1000-1099</b>			
<b>No.</b>	<b>Exhibit</b>	<b>Objection</b>	
1000	Declaration of Taylor M. Vaughn in Support of Debtors' Motion to Reject Collective Bargaining Agreements Pursuant to 11 U.S.C. § 1113	¶2	Opinion testimony without adequate foundation
		¶12	Opinion testimony without adequate foundation, lack of foundation
		¶30	Lack of foundation, misleading
		¶36	Opinion testimony without adequate foundation, no personal knowledge
		¶38	Hearsay
		¶40	Opinion testimony without adequate foundation
		¶64	Hearsay, competency of witness, opinion testimony without adequate foundation
		¶33 n. 23	Mischaracterizes exhibit
1008	The APFA CBA Permits Low-Time Fliers to Erode Productivity	Lack of foundation, misleading	
1009	American's Flight Attendants Worked 38% of Days in 2011	Misleading	
1010	Flight Attendants Working a Full Schedule Are Well Compensated	Lack of foundation, misleading	
1029	APFA Early Out Proposal, February 15, 2012	Incomplete	
1042	American's Proposal Preserves Flight Attendant Take-Home Pay for Flight Attendants Working An Average Line of Time	Misleading, lack of foundation	

AA EXHIBIT NOS. 1100-1199			
No.	Exhibit	Objection	
1100	Declaration of James B. Weel in Support of American Airlines, Inc.'s Application to Reject Collective Bargaining Agreements Pursuant to 11 U.S.C. § 1113	¶6	Hearsay; lack of personal knowledge
		¶7	Hearsay; lack of personal knowledge
		¶8	Hearsay; lack of personal knowledge
		¶¶9-10	Hearsay; lack of personal knowledge
		¶18	Hearsay; lack of personal knowledge
		¶19	Hearsay; lack of personal knowledge
		¶21	Hearsay; lack of personal knowledge
		¶22	Hearsay; lack of personal knowledge
		¶23	Hearsay; lack of personal knowledge
		¶30	Hearsay; lack of personal knowledge
		¶31	Hearsay; lack of personal knowledge
		¶32	Hearsay; lack of personal knowledge
		n. 36	Hearsay; lack of personal knowledge
		¶34	Lack of personal knowledge
		¶36	Lack of personal knowledge
		¶40	Hearsay; lack of personal knowledge
		¶41	Hearsay; lack of personal knowledge
		¶42	Hearsay; lack of personal knowledge
		n. 43	Hearsay; lack of personal knowledge
		¶43	Hearsay; lack of personal knowledge
		¶45	Hearsay; lack of personal knowledge
		¶46	Hearsay; lack of personal knowledge
		¶47	Hearsay; lack of personal knowledge
		¶48	Hearsay; lack of personal knowledge
		¶49	Hearsay; lack of personal knowledge
		¶50	Hearsay; lack of personal knowledge
		¶51	Hearsay; lack of personal knowledge
		¶52	Hearsay; lack of personal knowledge
		¶53	Hearsay; lack of personal knowledge
		¶54	Hearsay; lack of personal knowledge
		¶55	Hearsay; lack of personal knowledge
		¶58	Hearsay; lack of personal knowledge
¶60	Hearsay; lack of personal knowledge		
¶61	Hearsay; lack of personal knowledge		
¶63	Hearsay; lack of personal knowledge		
¶64	Hearsay; lack of personal knowledge		
¶65	Hearsay; lack of personal knowledge		

AA EXHIBIT NOS. 1100-1199		
No.	Exhibit	Objection
		¶66 Hearsay; lack of personal knowledge
		¶67 Hearsay; lack of personal knowledge
		¶73 Hearsay; lack of personal knowledge
		¶74 Hearsay; lack of personal knowledge
		¶75 Hearsay; lack of personal knowledge
		¶76 Hearsay; lack of personal knowledge
		¶78 Hearsay; lack of personal knowledge
		¶79 Hearsay; lack of personal knowledge
		¶80 Hearsay; lack of personal knowledge
		¶82 Hearsay; lack of personal knowledge
		¶84 Hearsay; lack of personal knowledge
		¶85 Hearsay; lack of personal knowledge
		¶86 Hearsay; lack of personal knowledge
		¶88 Hearsay; lack of personal knowledge
		¶89 Hearsay; lack of personal knowledge
		¶91 Hearsay; lack of personal knowledge
		¶97 Hearsay; lack of personal knowledge
		¶99 Hearsay; lack of personal knowledge
		¶100 Hearsay; lack of personal knowledge
		¶101 Hearsay; lack of personal knowledge
		¶102 Hearsay; lack of personal knowledge
1113	Chronology of American Airlines, Inc.’s Pre-Petition Negotiations with Mechanic & Related Employees from AANegotiations.com	Lack of personal knowledge; hearsay
1114	Chronology of American Airlines, Inc.’s Pre-Petition Negotiations with Fleet Service Clerks, Stores (Stock Clerks), Ground School Instructors, and Simulator Technicians from AANegotiations.com	Hearsay
1115	Chronology of American Airlines, Inc.’s Pre-Petition Negotiations with Maintenance Control Technicians from AANegotiations.com	Hearsay
1116	Chronology of American Airlines, Inc.’s Pre-Petition Negotiations with Dispatchers from AANegotiations.com	Hearsay
1117	American Airlines, Inc.’s Spring 2010 “From the Ground Up” Mailer to Fleet Service Employees	Hearsay

<b>AA EXHIBIT NOS. 1100-1199</b>		
<b>No.</b>	<b>Exhibit</b>	<b>Objection</b>
1125	November 29, 2011 letter to TWU regarding Fleet Service and Dispatch TAs	Hearsay
1130	Cost-Out of American's Initial Section 1113 Proposal to TWU Regarding Fleet Service	Lack of personal knowledge; hearsay; opinion; lack of foundation
1131	Cost-Out of American's Initial Section 1113 Proposal to TWU Regarding Dispatch	Lack of personal knowledge; hearsay; opinion; lack of foundation
1132	Cost-Out of American's Initial Section 1113 Proposal to TWU Regarding Simulator Technicians	Lack of personal knowledge; hearsay; opinion; lack of foundation
1133	Cost-Out of American's Initial Section 1113 Proposal to TWU Regarding Ground School and Pilot Simulator Instructors	Lack of personal knowledge; hearsay; opinion; lack of foundation
1140	Cost-Out of American's March 22, 2012 Section 1113 Proposal to TWU Regarding Fleet Service	Hearsay
1141	Cost-Out of American's March 22, 2012 Section 1113 Proposal to TWU Regarding Dispatch	Hearsay
1142	Cost-Out of American's March 22, 2012 Section 1113 Proposal to TWU Regarding Instructors	Hearsay
1143	Cost-Out of American's March 22, 2012 Section 1113 Proposal to TWU Regarding Sim Techs	Hearsay

AA EXHIBIT NOS. 1200-1299			
No.	Exhibit	Objection	
1200	Declaration of Mark L. Burdette in Support of American Airlines, Inc.'s Application to Reject Collective Bargaining Agreements Pursuant to 11 U.S.C. § 1113	¶¶3-4	Lack of personal knowledge
		¶9	Lack of personal knowledge
		¶12	Hearsay; lack of personal knowledge
		¶19	Hearsay
		¶20	Hearsay; opinion/lack of foundation
		¶¶21-22	Hearsay; opinion/lack of foundation
		¶24	Hearsay; opinion/lack of foundation
		¶26	Hearsay; opinion/lack of foundation
		¶27	Hearsay
		¶28	Hearsay
		¶29	Opinion/lack of foundation
		¶30	Opinion/lack of foundation
		¶31	Opinion/lack of foundation
		¶33	Hearsay
		¶34	Hearsay
		¶35	Lack of personal knowledge
		¶36	Lack of personal knowledge
		¶38	Lack of personal knowledge
		¶40	Lack of personal knowledge
		¶42	Lack of personal knowledge
		¶45	Lack of personal knowledge
		¶46	Lack of personal knowledge
		¶47	Lack of personal knowledge; best evidence
		¶48	Lack of personal knowledge; best evidence
		¶49	Lack of personal knowledge
		¶50	Lack of personal knowledge
		¶51	Lack of personal knowledge
¶52	Hearsay; lack of personal knowledge		
¶53	Lack of personal knowledge		
¶60	Best evidence; lack of personal knowledge		
¶62	Lack of personal knowledge		
¶63	Lack of personal knowledge		
¶66	Lack of personal knowledge		
¶67	Lack of personal knowledge		
¶68	Lack of personal knowledge		
¶69	Lack of personal knowledge		

		¶70	Lack of personal knowledge
		¶72	Lack of personal knowledge
		¶¶73-75	Lack of personal knowledge
		¶76	Opinion/lack of foundation
		¶78	Lack of personal knowledge
		¶79	Lack of personal knowledge
		¶80	Lack of personal knowledge
		¶85	Lack of personal knowledge; opinion/lack of foundation
		¶86	Lack of personal knowledge
		¶87	Opinion/lack of foundation; lack of personal knowledge
		¶88	Lack of personal knowledge; hearsay
		¶89	Lack of personal knowledge
		¶90	Lack of personal knowledge
1205	Cost-Out of American's Initial Section 1113 Proposal to TWU Regarding M&R Employees		Lack of personal knowledge; hearsay
1206	Cost-Out of American's Initial Section 1113 Proposal to TWU Regarding Stock Clerks		Lack of personal knowledge; hearsay
1207	Cost-Out of American's Initial Section 1113 Proposal to TWU Regarding MCTs		Lack of personal knowledge; hearsay
1212	Cost-Out of American's March 22, 2012 Section 1113 Proposal to TWU Regarding M&R Employees		Lack of personal knowledge; hearsay
1213	Cost-Out of American's March 22, 2012 Section 1113 Proposal to TWU Regarding Stock Clerks		Lack of personal knowledge; hearsay
1214	Cost-Out of American's March 22, 2012 Section 1113 Proposal to TWU Regarding MCTs		Lack of personal knowledge; hearsay

<b>AA EXHIBIT NOS. 1300-1399</b>		
<b>No.</b>	<b>Exhibit</b>	
1302	Pilot Lost Time Data American Airlines VS. 8 Passenger Carriers for Calendar Year 2011	Hearsay; relevance

**AA EXHIBIT NOS. 1400-1499 [RESERVED]**