

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

DAVID SAMBRANO, individually and on  
behalf of all others similarly situated, *et al.*,

*Plaintiffs,*

v.

UNITED AIRLINES, INC.,

*Defendant.*

Civil Action No.: 4:21-cv-01074-P

**REDACTED APPENDIX IN SUPPORT OF  
PLAINTIFFS' MOTION FOR CLASS CERTIFICATION  
VOLUME II OF III  
EXHIBITS 66–115; APP.366–684**

Plaintiffs file this three-volume Redacted Appendix in Support of Plaintiffs' Motion for Class Certification and, in support thereof, show the Court as follows:

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January 26, 2024

Respectfully submitted,

/s/ Mark R. Paoletta

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**CERTIFICATE OF SERVICE**

A true and correct copy of the foregoing has been served via the Court's electronic filing system upon all counsel of record and a copy has been provided to Defendant's counsel.

/s/ Brian J. Field  
Brian J. Field

# **EXHIBIT 66**



**To:** Sharma, Garima[garima.sharma@united.com]; Limacher, Kirk[kirk.limacher@united.com]  
**From:** Robb, Neil/[Exchange]absolut-Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5102c14d51c44bbb87a82b14107b42ac-u368374  
**Sent:** Wed 10/13/2021 9:39:08 AM (UTC-05:00)  
**Subject:** RE: RAP data needed

Mr. Castillo opened a medical RAP on 9/19 alleging he has natural immunity from a previous positive COVID case. We have requested supporting medical docs from the employee on 9/22, 9/29 and 10/5. He has yet to engage in the process. We set the case to "Did not Engage – Denied" on 10/7.

He has never mentioned religious RAP in the HH case. If he had, we would not have entertained it as his medical RAP came in after 8/31.

---

**From:** Sharma, Garima <garima.sharma@united.com>  
**Sent:** Wednesday, October 13, 2021 9:02 AM  
**To:** Limacher, Kirk <kirk.limacher@united.com>  
**Cc:** Robb, Neil <neil.robb@united.com>  
**Subject:** RE: RAP data needed

The case was Denied with a Status of "Did Not Engage – Denied". Copying Neil if you need any other specifics about the case as he may have more context.

Thanks,  
Garima

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**From:** Limacher, Kirk <kirk.limacher@united.com>  
**Sent:** Wednesday, October 13, 2021 7:50 AM  
**To:** Sharma, Garima <garima.sharma@united.com>  
**Subject:** Re: RAP data needed

Was it denied?

Sent from my iPhone

On Oct 13, 2021, at 7:48 AM, Sharma, Garima <garima.sharma@united.com> wrote:

The only RAP I have for David Castillo is a Medical RAP that was opened on Sep 19 ( Case Number: HRC3783797).

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**From:** Limacher, Kirk <kirk.limacher@united.com>  
**Sent:** Wednesday, October 13, 2021 7:29 AM  
**To:** Sharma, Garima <garima.sharma@united.com>  
**Subject:** Re: RAP data needed

Is David Castillo in the 106?

Sent from my iPhone

On Oct 12, 2021, at 7:58 PM, Sharma, Garima <garima.sharma@united.com> wrote:

Hi Kirk,  
Sorry, it took a bit longer than I thought. There were a few nuances in the data that took a bit to iron out. Attached contains the unique listing of all employees that applied for a RAP. Quick call outs:  
1. This only includes employees that were covered by the vaccine requirements, are still Active or on Leave, and are not Fully Vaccinated.

APP.367

2. In cases where an employee has submitted multiple religious RAP cases, I looked at the most recent one.
3. Of note, if an employee canceled/withdrew after the RAP was approved, it is counted in the denied/cancel/withdrawn total
4. In some cases, employees had a Medical RAP approved after the Religious RAP was denied/canceled/withdrawn. I left them in for now but we can easily take them out. I have called out the total with & without these cases

Here is the breakdown of the data requested (highlighted in blue)

- Total count of **Denied, Cancel, and/or Withdrawn** religious accommodations: 334 (15 of these were approved for a Medical RAP)
- Number of **denied** religious accommodations where the religious accommodation was submitted on or before August 31<sup>st</sup>: 130 (1 of these is approved for a Medical RAP)
- Number of **denied** religious accommodations where the religious accommodation was submitted on or after September 1<sup>st</sup>: 106 (1 of these is approved for a Medical RAP)

Attached contains the data with a Pivot for denials on or after Sep 1 pivoted by Union Code & location. The data is as of 5 pm from Help Hub this evening. Please feel free to call if you have any questions.

Thanks,  
Garima

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**From:** Limacher, Kirk <kirk.limacher@united.com>  
**Sent:** Tuesday, October 12, 2021 5:19 PM  
**To:** Sharma, Garima <garima.sharma@united.com>  
**Subject:** RAP data needed

Thanks for taking my call. This is what I'm looking for:

- Total count of **Denied, Cancel, and/or Withdrawn** religious accommodations
- Number of **denied** religious accommodations where the religious accommodation was submitted on or before August 31<sup>st</sup>
- Number of **denied** religious accommodations where the religious accommodation was submitted on or after September 1<sup>st</sup>

For the yellow highlighted, can I have the raw data and pivot chart by Union Code and then Location?

Please call me with any questions.

Thanks!

**Kirk Limacher**  
VP, HR Services  
United Airlines | Corporate Support Center  
872.825.6294 – Office  
312.465.3629 -- Cell

<Religious RAP\_Denials\_Cancels\_Withdrawals\_AsofOct12.xlsx>

# **EXHIBIT 67**



To: Limacher, Kirk[kirk.limacher@united.com]  
From: Robb, Neil/Exchange/absou/Exchange Administrative Group  
(FYDIBOHF23SPDLT/cn=Recipients/cn=5102c14d51c44bbb87a62b14107b42ac-u368374)  
Sent: Mon 10/18/2021 6:51:30 AM (UTC-05:00)  
Subject: Fwd: Please help! HRC3675362

husband

Neil Robb  
Director - ESC Absence Management  
United Airlines

---

From: Gebo, Kate <Kate.Gebo@united.com>  
Sent: Monday, October 18, 2021 6:34:24 AM  
To: Robb, Neil <neil.rob@united.com>; Kemp, Jennifer <Jennifer.Kemp@united.com>  
Subject: Fwd: Please help! HRC3675362

Sent from my iPad

Begin forwarded message:

From: [REDACTED]@united.com>  
Date: October 17, 2021 at 9:16:25 PM CDT  
To: "Gebo, Kate" <Kate.Gebo@united.com>  
Cc: [REDACTED]@united.com>, "Kemp, Jennifer" <Jennifer.Kemp@united.com>  
Subject: Please help! HRC3675362

Dear Mrs. Gebo-

I hope you are doing well, as we are coming out of this pandemic I hope your family is safe. I wanted to get some support from you on my situation. I put in for a Medical Accommodation on 08/25/2021, the medical team requested more information from my Dr which we went back and forth for days with extreme deadlines during the holiday weekend but I still met them. After not hearing back I also requested my religious exemption which I should be able to apply for both if both apply to me. This is the response I received back after asking many times for an answer. It was then denied due to the religious one requested and no one will respond to me on WHY my medical one was denied, it's been over a month with ZERO communication. I have severe anxiety & diabetes and take many medications, it took 7 years to get it under control to be able to function at work. My Dr has supported me through this, but has not heard back on what else is needed.

Can you please help? I keep asking for over a month and no one is responding from HR or Medical. Very stressful and frustrating. I am a 25 year employee and have never been treated like this. It feels very non-inclusive and non-caring, what are we doing as a company?

Also, I am not understanding why now we have to be singled out and wear a N95 mask when we were given a UA clothe mask for the year telling us that it was safe. I really wish our SAFETY team would elaborate on this for us to better understand the why behind it?

SEE highlighted in YELLOW the response.

APP.370

Thank you

"[REDACTED]"

[REDACTED] U271650

24d ago Additional comments

Good evening, it's been 10 days and I have still not received a response from medical for the reason why my medical accommodation was denied? Can someone please review? thank you [REDACTED]

[REDACTED]

29d ago Additional comments

Good evening, it's been 4 days and I have still not received a response from medical for the reason why my medical accommodation was denied? Can someone please review? thank you [REDACTED]

[REDACTED]

about a month ago Additional comments

Good evening, can you please tell me why my medical exemption was denied?

[REDACTED]

about a month ago Additional comments

Jennifer can you please tell me why my medical exemption was denied?

JK  
Jennifer Kemp

about a month ago Additional comments

Dear [REDACTED]

Thank you for submitting your request for a medical Reasonable Accommodation on 08/25/21. We have reviewed the information you have provided. At this time your request for a medical accommodation is denied. Per your request, we have reviewed and approved a religious accommodation on 09/10/21, which you can find the details for in your To Dos.

Please feel free to contact the Employee Service Center at 1-877-825-3729 if you have any questions.

Thank you,  
ESC Absence Management

[REDACTED]

about a month ago Additional comments

I'm still waiting on my medical exemption, before I review my religious one. Thank you

**APP.371**



about a month ago Additional comments

Good Morning,

Your third-party letter has been received. We will communicate the decision regarding your religious accommodation as soon as possible.

Thank you,

ESC Absence Management

S  
system

about a month ago

[I.C follow up Dr syed.pdf](#)

42.1 KB

CCM

Carina Cano- Medrano

about a month ago Additional comments

Dear [REDACTED]

As discussed in in your Help Hub case HRC3675362 on September 3, 2021, United Medical has notified us that additional information is needed in order to complete the Assessment of Functional Capabilities (AFC) form for your RAP session. In order to continue the process, United Medical needs the following information:

Please have your treating health care provider submit the following information

1. The letter dated 08/20/21 indicated, "he doesn't want to take any chance with COVID-19 vaccination, and feels extremely scared to put something in his body where there is not enough data available yet about it's long term adverse effects". In your objective medical opinion, please confirm that you are supporting that the employee not receive any of the COVID19 vaccines despite the FDA approval of the Pfizer-BioNTech (COMIRNATY) COVID-19 Vaccine.
2. If the condition is maintained on psychotropic medications, please have your health care provider indicate how the condition would be exacerbated by getting the vaccine?
3. Please have your health care provider indicate the duration of the restriction (i.e., how long will you be unable to receive the covid-9 vaccine due to your medical conditions - weeks, months, etc.).

This additional information must be faxed to OPCMD at 847-700-2600 by September 8, 2021. Upon receipt of the completed Work Restriction Form, an Assessment of Functional Capabilities (AFC) form will be completed by United's Medical department and a RAP Administrator will contact you to schedule the RAP meeting for possible accommodation options.

If you have questions, please do not hesitate to contact a RAP Specialist at 877-UAL-ESC9 (877- 825-3729).  
Sincerely, RAP Specialist  
Employee Service Center - WHQMW

cc: OPCMD - Medical Department

**APP.372**

2mo ago Additional comments

August 29, 2021

To Whom it May Concern:

I would first like to thank you for your time and consideration in this matter. With the given mandate for all United Airline employees to be given COVID shots, the purpose of this letter is to request exemption based on my pro-life and religious beliefs. I have been a hardworking Move-Team employee for over 25 years, I have had exceptional attendance and have done everything that has been asked of me as a dedicated employee. I work safe on a daily basis and have always done my job with 150%.

I, [REDACTED] sincerely hereby request a religious exemption to this shot mandate. It is my personal conviction, based on the Christian worldview that I hold to and believe in, that the Holy Scriptures are the word of God and therefore provide me with a religious mandate to uphold and obey. I certainly have not been perfect in my walk of faith, but God's word has always been a guide for me, my wife, and my boys. God has declared in His word that the human body is a temple and so I am called to take care of it.

1 Cor 6:19-20

I believe that innocent life is sacred to God, from conception, to birth, to natural death. (Jeremiah 1:5). I believe God's promise that "if anyone lacks wisdom, let him ask of God, who gives to all liberally." I understand that the manufacturers of the COVID shots have used aborted fetal cell lines as part of their development or testing of vaccines. My faith prohibits me from participating in or benefiting from an abortion, no matter how remote in time that abortion occurred.

I am commanded to obey God in this way, and therefore I cannot subject myself, in good conscience, to this COVID shot.

It is against my faith and my conscience to commit sin. Sin is anything that violates the will of God, as set forth in the Bible, and as impressed upon the heart of the believer by the Holy Spirit. To keep myself from sin, and receive God's direction in life, I pray and ask God for wisdom and direction daily. As part of my prayers, I have asked God for direction regarding the current COVID shot requirement. As I have prayed about what I should do, the Holy Spirit has moved on my heart and conscience that I must not accept the COVID shot. If I were to go against the moving of the Holy Spirit, I would be sinning and jeopardizing my relationship with God and violating my conscience.

I'm asking for an exemption from the COVID shot directive so that my conscience can remain clear before God.

Thank you for your time and consideration.  
Thank you  
[REDACTED]

PD  
Paul Diaz-Ventura

2mo ago Additional comments

Hello [REDACTED] - You may submit your religious docs under the same HRC. Please upload the information in this

APP.373



HRC, Thank you

2mo ago Additional comments

User [REDACTED] has initiated a Reasonable Accommodation (RAP) Request request

2mo ago

HRC3675362 Created

Start

Loading...

**Ask a question about this case**

Hello, how can I help you?

- Comment
- Work Note

Message

Loading...

add a comment

**Ask a question about this case**

Hello, how can I help you?

- Comment
- Work Note

Message

Opened for [REDACTED]

Subject person [REDACTED]

0

Watch list

[Add Person](#)[View all](#)  
[Manage Watch list](#)  
[Add People](#)

**APP.374**

Short description

Reasonable Accommodation Request - [REDACTED]

Back

• All To-dos

All

All (0)

Show completed to-dos

Show upcoming to-dos

All To-dos are Complete

• All To-dos

No To-dos

You have no completed to-dos to display

[Site Feedback](#)

# **EXHIBIT 68**

**To:** Robb, Neil[neil.robbs@united.com]  
**From:** Rivera Torres, Carlos[O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=FE331786CC234542AE767358A3D5492B-U268349]  
**Sent:** Fri 9/3/2021 12:31:48 AM (UTC-05:00)  
**Subject:** Cases able to complete tonight...

So...after I worked on this email I began working on the pilots only...and just finished. I was able to complete around 91 cases in around 3 ½ hours (and I took a quick shower around 10pm). 😊

I usually work pretty fast in these systems so I don't expect all Managers to process this many.

I selected Clarence for this work and I know he can kick butt...if he and I are able to wipe out our work, we will certainly jump on other regions.

Hope you have a great trip!



**Carlos Rivera Torres**  
ESC Manager – West Region  
Absence Management

United | Corporate Support Center  
233 South Wacker Drive, 25th Floor | Chicago, IL 60606  
Tel. 847 700 3296 | Mobile 312 802 0836 | [carlos.riveratorres@united.com](mailto:carlos.riveratorres@united.com)

---

**From:** Rivera Torres, Carlos  
**Sent:** Thursday, September 2, 2021 8:45 PM  
**To:** Limacher, Kirk <kirk.limacher@united.com>; Kemp, Jennifer <Jennifer.Kemp@united.com>; Robb, Neil <neil.robbs@united.com>  
**Cc:** Daniels, Kimberly <kimberly.daniels@united.com>; Love, Jasmine <jasmine.love@united.com>; Curtis, Lee <mark.curtis@united.com>  
**Subject:** RE: Pending Religious RAP <review order>

Good Evening Kirk,

Yes...we can process our reviews in the manner specified below by sorting all of the Religious COVID19 RAP cases by Division. There will be a total of 8 people working (2 per region – One Manager/One Staff Rep) on each of our respective regions' cases.

The following can be utilized for training purposes tomorrow...

#### Process for reviewing COVID-19 Religious Accommodation Cases

Employees would need to ensure they have met the two-prong criteria to deem the case as "eligible for accommodation":

1. Employee provided a statement of their sincerely held religious belief that supports inability to be vaccinated against COVID-19
2. Employee provided a 3<sup>rd</sup> party letter from someone who knows the employee personally and can support the employee's sincerely held religious beliefs against receiving the COVID-19 vaccine

#### **Reviewing Cases**

- For your respective region, from the Operational Dashboard, click on the Unassigned Religious RAP tile
- Right click on the column "Division" to process cases in the following order: Flight Operations → Airport Operations → Technical Operations → Flight Attendants → All Others
  - o Click on the HRC number to access the case

o Check for sincerely held belief statement (could be in the Description field, within the comments area, or as an

APP.377



attachment either at the top or at the bottom within the Clearinghouse tab

Case 4:21-cv-01074-P Document 243-1 Filed 01/26/24 Page 23 of 329 PageID 8774  
• If there is no statement of request at 451, it will be automatically denied (see attached for verbiage) and suspend for 3 days awaiting employee response\*

\*NOTE: By now most cases will already have some statement regarding their religious belief...however some of the cases that were submitted at the very last minute may not

- o Check for a 3<sup>rd</sup> party letter supporting the employee's sincerely held religious beliefs
  - The 3<sup>rd</sup> party letter MUST reference the employee and provide information supporting their beliefs
    - Letters that are "generic" (not mentioning employee) or that can be obtained from the internet (3 of the more prevalent ones are from True Hope Ministries, Rev. Gregory Cox, and those signed by David Hall) are NOT accepted and we would request a 3<sup>rd</sup> party letter from employee and suspend case for 3 days awaiting documentation (see attached for verbiage)
- o If both prongs are met, the employee would be deemed as needing a religious accommodation

We will use the Priority field in Help Hub to categorize cases for processing in the manner below:

- 1 – Critical Employee has met criteria for a reasonable accommodation
- 3 – Moderate Case is being currently processed (we have asked for the 3<sup>rd</sup> party letter and are awaiting documents from employee); State will show as Suspended if docs requested with a follow up date
- 5 – Planning Case deemed as denied (i.e. employee advises it is unlawful for United to ask for any information, only claimed 1<sup>st</sup> amendment rights, etc.)

Note: If we request documentation and the employee does not provide the information, we would advise the employee their case would be closed due to no response (see attached for verbiage).

Next week, we will use the priority settings of each religious RAP case to automatically send communication to the employees regarding the decision made...more info on this process to follow.

We will share some of the more commonly seen "internet" letters tomorrow during the training so that those processing these cases can be on the "lookout".

Thanks,  
Carlos

Carlos Rivera Torres  
ESC Manager – West Region  
Absence Management

United | Corporate Support Center  
233 South Wacker Drive, 25th Floor | Chicago, IL 60606  
Tel. 847 700 3296 | Mobile 312 802 0836 | [carlos.riveratorres@united.com](mailto:carlos.riveratorres@united.com)

**From:** Limacher, Kirk <[kirk.limacher@united.com](mailto:kirk.limacher@united.com)>

**Sent:** Thursday, September 2, 2021 6:30 PM

**To:** Rivera Torres, Carlos <[carlos.riveratorres@united.com](mailto:carlos.riveratorres@united.com)>; Kemp, Jennifer <[Jennifer.Kemp@united.com](mailto:Jennifer.Kemp@united.com)>; Robb, Neil <[neil.robbs@united.com](mailto:neil.robbs@united.com)>

**Subject:** Pending Religious RAP <review order>

**APP.378**

- Pilots
- AO
- Technician
- Flight Attendants
- All others

Not sure how were dividing up assignment (but hope to learn in training tomorrow).

Please let me know if you have any concerns.

Thanks!

**Kirk Limacher**

VP, HR Services

United Airlines | Corporate Support Center

872.825.6294 – Office

312.465.3629 -- Cell

# **EXHIBIT 69**



# Vaccine Requirement Updates

CONFIDENTIAL: September 2, 2021

UNITED 

APP.381

CONFIDENTIAL

UNITED\_SAMBRANO\_00079351

## RAP Update

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- **Religious and medical high volume all work groups**
  - Communication will begin next week with details of how the accommodations will work to all FO/IF applicants
  - Approvals/denials to begin notifications Tuesday
    - Employees will have the opportunity to acknowledge or rescind accommodation (5 days from receipt of approval letter)
    - If approved/denied RAP, 5 weeks from date to receive vaccine with first vaccination by 09/27
  - We are not addressing late Religious RAP requests; however, for medical we will look at case by case

**We will host a meeting as soon as we have finalization to provide details to you**

UNITED  2

Many religious RAPs will be approved

Employees will have the opportunity to accept/decline accommodation (5 days from receipt of approval letter to

## Separation codes for vaccine related voluntary exits

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- **Two types of voluntary exits prior to 09/27/21:**
  1. **Non-retiree:** New voluntary code "Refused to Comply with Policy" is now available in MTB for managers & HRPs.
  2. **Retiree:** If the employee is retiree eligible, the manager / HR partner should enter a retirement.
    - HR Ops will reach out to see if it was related to the vaccine policy.
    - Must retire on or before **9/27** (unless an individual has been RAP'd).

## Priorities / Comms

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- **Communications:**

- Emails to active employees who are not compliant
  - Every 4 days
  - Verbiage will strengthen as we draw closer to the deadline
  - M&A employees will receive a Warning of Termination 09/13
- Postcard is in the mail

- **To address commonly asked questions:**

- Pre-recorded video with Dr Robinson, BCBSIL & Sasha Johnson to be posted Friday.
- Video of how to upload/UD story by 9/7
- Leader talking points will be updated as needed

- **Reports** to M&A Officers and HRMDs sent out Tues/Friday

# **EXHIBIT 70**



To: Catanzano, Jessica[jessica.catanzano@united.com]  
From: Mink, Alison[alison.mink@united.com] (FYDIBOHF23SPDLT)/cn=Recipients/cn=bd279613ba244a1194dd39612f5f5b38-u370268]  
Sent: Wed 8/25/2021 10:10:27 AM (UTC-05:00)  
Subject: RE: Vaccine FAQ add

Case 4:21-cv-01074-P Document 243-1 Filed 01/26/24 Page 31 of 329 PageID 8782

Good catch, I'll fix that! I also updated the FAQ with that highlighted edit EOD yesterday, so we're good there. Marie sent over some other edits for the FAQ, too – do you know if the onsite clinics still have vaccines/what the situation is there?

---

From: Catanzano, Jessica <jessica.catanzano@united.com>  
Sent: Wednesday, August 25, 2021 10:01 AM  
To: Mink, Alison <alison.mink@united.com>  
Subject: RE: Vaccine FAQ add

Hey – when those emails are out, can you add the highlighted portion to the FAQ, please? Also, I noted a missing period/space (see SS below). I think I'll have another update for tomorrow re: leaves, but I'll send that one separately.

## Who is required to be vaccinated against COVID-19 at United?

All U.S.-based employees (including Guam, Puerto Rico) are required to be vaccinated and upload their vaccination card to Flying Together by Sept. 27, 2021. Active employees and flight attendants on COLA must submit their RAP requests by Aug. 31, 2021.

The only exceptions to this policy will be employees who seek and are granted a medical or

---

Jessica Catanzano, SPHR  
HR Project Manager

United | Willis Tower 233 S. Wacker Dr. | Chicago, IL 60606  
☎ (872) 825.5536 | [jessica.catanzano@united.com](mailto:jessica.catanzano@united.com) | [united.com](https://united.com)

---

From: Catanzano, Jessica  
Sent: Monday, August 23, 2021 7:07 PM  
To: Mink, Alison <alison.mink@united.com>; 'Roman, Gladys (gladys.roman@united.com)' <gladys.roman@united.com>  
Cc: Millichap, Stephanie <Stephanie.Millichap@united.com>  
Subject: Vaccine FAQ add

I know you're in the midst of other changes today, but before I forget, we need to add this as well to the question below.

What if I'm unable to be vaccinated for medical or religious reasons?

United's Reasonable Accommodation Process (RAP) will be made available to those unable to be vaccinated for medical or religious reasons. You can find more information or submit a request for accommodation on Help Hub.

Active employees and flight attendants on COLA must submit their RAP requests by Aug. 31, 2021. For a medical accommodation, you will be asked to provide supporting documentation from your doctor; for a religious accommodation, supporting documentation from religious leadership within your organization.

If an employee has both a medical and a religious accommodation request for the COVID-19 vaccine, the employee should submit a medical RAP request via Help Hub. Once submitted, they should go into that case and add a note stating they have a religious accommodation as well. The RAP team will work the medical accommodation request first and then work the religious accommodation second.

---

Jessica Catanzano, SPHR  
HR Project Manager

APP.386

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**From:** Robb, Neil <[neil.robb@united.com](mailto:neil.robb@united.com)>

**Sent:** Monday, August 23, 2021 4:05 PM

**To:** Catanzano, Jessica <[jessica.catanzano@united.com](mailto:jessica.catanzano@united.com)>; Cooney, Julianne <[Julianne.Cooney@united.com](mailto:Julianne.Cooney@united.com)>

**Subject:** RE: [EXTERNAL] Re: United Airlines RAP and news about forcing shots and getting all other to do the same.

If an employee has both a medical and a religious accommodation request for the COVID-19 vaccine, the employee should submit a medical RAP request via Help Hub. Once submitted, they should go into that case and add a note stating they have a religious accommodation as well. The RAP team will work the medical accommodation request first and then work the religious accommodation second.

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**From:** Catanzano, Jessica <[jessica.catanzano@united.com](mailto:jessica.catanzano@united.com)>

**Sent:** Sunday, August 22, 2021 10:16 AM

**To:** Cooney, Julianne <[Julianne.Cooney@united.com](mailto:Julianne.Cooney@united.com)>

**Cc:** Robb, Neil <[neil.robb@united.com](mailto:neil.robb@united.com)>

**Subject:** Re: [EXTERNAL] Re: United Airlines RAP and news about forcing shots and getting all other to do the same.

Neil - let me know what wording you'd like

On Aug 22, 2021, at 10:02 AM, Cooney, Julianne <[Julianne.Cooney@united.com](mailto:Julianne.Cooney@united.com)> wrote:

I think we should add an FAQ.

On Aug 22, 2021, at 9:55 AM, Catanzano, Jessica <[jessica.catanzano@united.com](mailto:jessica.catanzano@united.com)> wrote:

It is not. Let me know if we need to add a line.

On Aug 21, 2021, at 12:10 PM, Robb, Neil <[neil.robb@united.com](mailto:neil.robb@united.com)> wrote:

I don't believe it's covered in FAQ.

Neil Robb  
Director - ESC Absence Management  
United Airlines

---

**From:** Cooney, Julianne <[Julianne.Cooney@united.com](mailto:Julianne.Cooney@united.com)>

**Sent:** Saturday, August 21, 2021 12:08:21 PM

**To:** Robb, Neil <[neil.robb@united.com](mailto:neil.robb@united.com)>; Catanzano, Jessica <[jessica.catanzano@united.com](mailto:jessica.catanzano@united.com)>

**Subject:** RE: [EXTERNAL] Re: United Airlines RAP and news about forcing shots and getting all other to do the same.

OK, I just need to communicate the process to the union. Some employees may legitimately have two exemptions so as long as there is a mechanism in place to report two exemptions I think we are fine. Do we have this question covered in the FAQ?

**Julianne Cooney**  
Director, Labor Relations - Ground  
United | Corporate Support Center | 233 S. Wacker Drive WHQLR 25th Floor | Chicago, IL 60606  
Office 872-825-5027 | Cell 847-404-6980 | [julianne.cooney@united.com](mailto:julianne.cooney@united.com)

APP.387



**From:** Robb, Neil <neil.robb@united.com>

**Sent:** Friday, August 20, 2021 1:43 PM

**To:** Cooney, Julianne <Julianne.Cooney@united.com>; Catanzano, Jessica <jessica.catanzano@united.com>

**Subject:** RE: [EXTERNAL] Re: United Airlines RAP and news about forcing shots and getting all other to do the same.

Why would we want employees to open two RAP cases for the same issue? If the employee has a legitimate medical issue that prevents them from being vaccinated, they should submit that RAP request. Asking my team to work two requests simultaneously is excessive.

My solution has been for the employee to submit a RAP request for either reason. Then go back into HH to add a note requesting the second reason. My team will work the medical angle first.

**From:** Cooney, Julianne <Julianne.Cooney@united.com>

**Sent:** Friday, August 20, 2021 1:56 PM

**To:** Catanzano, Jessica <jessica.catanzano@united.com>; Robb, Neil <neil.robb@united.com>

**Subject:** FW: [EXTERNAL] Re: United Airlines RAP and news about forcing shots and getting all other to do the same.

Hi,

Can we get clarification on the process for employees that want to apply for both a medical and religious exemption? Thanks.

**Julianne Cooney**

Director, Labor Relations - Ground

United | Corporate Support Center | 233 S. Wacker Drive WHQLR 25th Floor | Chicago, IL 60606

Office 872-825-5027 | Cell 847-404-6980 | [julianne.cooney@united.com](mailto:julianne.cooney@united.com)

**From:** [REDACTED]

**Sent:** Friday, August 20, 2021 1:54 PM

**To:** Reardon, Thomas - LR <[thomas.reardon@united.com](mailto:thomas.reardon@united.com)>; Cooney, Julianne <[Julianne.Cooney@united.com](mailto:Julianne.Cooney@united.com)>

**Subject:** [EXTERNAL] Re: United Airlines RAP and news about forcing shots and getting all other to do the same.

This message was sent from outside of United Airlines. Please do not click links or open attachments unless you recognize the sender and know that the content is safe.

Email from employee;

Today 8/19/21 I tried to apply for a medical and a religious RAP. I called ECS and Karen Mahecha was the staff rep who I talked to stated that Neil Robb Dir absent mangt made the decision to not allow 2 RAP's at the same time starting today. Also, that I could remove one for the other and there is no time line to accept or deny, that leaves me to choose one and hope they approve or deny before Aug 31,2021 that way I could hopefully apply for the other RAP.

From Me [REDACTED] What I found out discussing this with HR and understand I think Mr. Robb changed his position;

This morning I looked into an issue brought up at our General Membership Meeting yesterday regarding UAL's RAP (Reasonable Accommodation Process) for the Covid vaccine and the company only allowing a single exemption at a time. I have been informed that

APP.388

employees desiring to seek both medical and religious based exemptions need to fill out the Help Out Request form and file, as a separate entry, in your existing case, which is found under your "Requests", add the other exemption. Make sure you make a copy/screenshot of everything.

Thank you,

[REDACTED]

# **EXHIBIT 71**



**From:** Limacher, Kirk </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=A80CA305C9E248B8B9C748F22E3B5FFE-U330706>  
**To:** ONeil, Mary; Wit, Vania Montero [HDQLD] (vania.wit@united.com); Frederick, Sheila; Matthews, Jordan M.  
**Sent:** 10/25/2021 11:04:45 AM  
**Subject:** FW: Update on timing of your reasonable accommodation

It's out.

**Kirk Limacher**

VP, HR Services

United Airlines | Corporate Support Center

872.825.6294 – Office

312.465.3629 -- Cell

**From:** HR Communication <hr.communication@united.com>  
**Sent:** Monday, October 25, 2021 11:03 AM  
**To:** Limacher, Kirk <kirk.limacher@united.com>  
**Subject:** Update on timing of your reasonable accommodation

## Update on timing of your reasonable accommodation



United employee –

Within the last several weeks, we let you know that your request for reasonable accommodation to United's COVID-19 vaccine requirement was approved. Given that your role requires interacting with customers and other employees on a daily basis, we determined that the best way to keep everyone as safe as we can is to place unvaccinated employees with an approved RAP on temporary unpaid leave until the pandemic meaningfully recedes.

The good news is the 7-day average positive case rate in the U.S. is just under 78,000, down from nearly 152,000 earlier this fall. However, some areas of the country continue to experience surges, and we know based on data from this time last year that as the weather cools down and people gather indoors, the positive case rate, hospitalization rate and death rate will likely increase.

In light of these developments, and in an effort to give you guidance on the likely duration of your temporary unpaid leave, we have developed specific metrics to define "meaningfully recedes." United will use the U.S. community transmission rate published daily by the CDC as well as nationwide daily case counts when making that determination. The community transmission rate is based on the number of cases in the last 7 days per 100,000 population and the number of tests in the last 7 days that have a positive result.

You will be returned to active status when the below criteria are met based on your role:

**For customer-facing ground employees:** Since your role is based in a single location, we will use local data. The community transmission rate must be "moderate" or below for at least 21 consecutive days in your state. For example, if you are a CSR who works at ORD, the community transmission rate on Oct. 19

APP.391

was "high" for the state of Illinois. This rate would need to be "moderate" for at least 21 consecutive days in order for you to return to active status. However, should the community transmission rate return to "substantial" or "high" for 7 consecutive days, you will be returned to unpaid leave.

**For crew (flight attendants & pilots):** Since crew travel across the U.S., we will use national data. Nationwide daily case count must be at or below 10,000 per day for at least 21 consecutive days on a rolling 7-day average. The nationwide daily case count on Oct. 18 was 51,249, which is a reduction from 117,008 on Oct. 1. However, should the nationwide daily count exceed 15,000 per day for 7 consecutive days, you will be returned to unpaid leave.

Given the dynamic nature of the COVID-19 pandemic, we will review these metrics every 30 days and take into account any additional guidance from the Centers for Disease Control (CDC) or state and local public health authorities and we reserve the right to revise these metrics accordingly.

As these metrics are met for in your location or for your workgroup, you will receive an email notification with your active status effective date. If you have any questions about your RAP you can submit an inquiry on [Help Hub](#).

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United Airlines | 233 S. Wacker Dr., Chicago, IL 60601

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APP.392

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UNITED\_SAMBRANO\_00081605

# **EXHIBIT 72**



**From:** Slutsky, Max </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=99A308C27D244AD2B9CE9667E188207D-U358322>  
**To:** Fariello, Theresa  
**Sent:** 1/5/2021 7:37:00 PM  
**Subject:** BRT Survey  
**Attachments:** image001.png; United CEO Response.pdf; United VPHR Response.pdf

Hi Terri:

I heard back from BRT and I have the survey responses from Kirk Limacher and Scott. There are a lot of similarities, but there are some notable differences. I've attached both responses here. They are password protected – not sure why—but the passwords are below.

- Unlt3d\_ceo
- Unlt3d\_vphr

How would you like to handle this? Given the Flying Together story it seems that Scott's characterization of mandatory vaccines might be overcome by events. They also differ on whether they would like help from BRT. Please see below.

#### Survey Response Differences.

Q1. HR's response includes more tools to encourage vaccination among employees. Scott does not check the box including townhalls from UA leaders. He also mentioned we are considering mandatory vaccination. HR also includes mandatory computer training.

Q2: when asked about incentives to get vaccinated, Scott mentioned offering paid time off to get vaccinated or recover from side effects. HR did not specify.

Q4: This question asks about mandatory vaccines. Both HR and Scott said MAYBE to considering mandatory vaccination for a subset of employees.

Q4A: They differ on which subsections. HR included a wider section of the workforce. Scott only suggested customer facing employees *could* be mandated.

Q4D: Considerations in pursuing mandatory vaccinations: HR is looking to guidance from EEOC and other government agencies. Scott on the other hand, was looking to see what other corporate leaders would do for them. He also mentioned he is open to discussing this directly with other leaders.

Q5A: This question asks about which segments of the workforce we would track vaccination for. HR and Scott match their selection the earlier workforce segments from Q4A.

Q7: HR and Scott differ on how to manage vaccination policy decisions across state lines. HR discusses partnering with healthcare providers and the airport authority. Scott says we haven't figured it out yet.

Q8: Scott and HR differ on whether United would like direct help from BRT on developing messaging or plans. HR says no. Scott says yes. He adds that he might want to benchmark against other companies.

Q9: Biggest questions/uncertainties. HR and Scott overlap, but HR includes concerns over liability. Scott does not.

--

Max Slutsky | Director, Strategic Advocacy & Planning | Government Affairs |United Airlines  
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UNITED 

APP.394





# **EXHIBIT 73**

**From:** Gebo, Kate </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=aa2e06ecb0134dde9ecb71c0a80f82f8-u196454>  
**To:** Limacher, Kirk  
**Sent:** 7/23/2021 3:16:40 PM  
**Subject:** Re: Analysis needed: COVID cases since June 1st against vaccination status <Confidential>  
**Attachments:** image005.jpg; image006.jpg

Thank you and well said

Sent from my iPhone

On Jul 23, 2021, at 8:55 AM, Limacher, Kirk <kirk.limacher@united.com> wrote:

In short, I don't know and continue to struggle with the right path forward.

A few things running through my head:

- 600,000 new vaccinations are occurring in the U.S. every day right now (per CDC). This will increase with full FDA approval and age 2-12 eligibility expected in the coming months
- Based on our analysis, most employees are NOT getting COVID at work but rather outside of work. Thus, as national/community vaccination rates increase, our employees by default are safer
- On average, 100 people die per day from the flu (in a normal year). COVID is hovering near 330 per day right now (so, 3.5 times higher than the flu) which is the lowest its been since March 2020 even with much higher case volumes (driven by Delta variant). Need to continue watching this metric
- Hospitals and schools (for students) have been the first to mandate vaccinations. But, these institutions have a history with vaccine mandates or are dealing with more contained, manageable groups of employees/students. They are not like us. Further, the hospitals have had much higher rates of vaccination to start with (thus, the gaps were easier to close)
- If we mandate, it will consume frontline management and HR resources for the foreseeable future (at the same time we're trying to accomplish explosive growth and operational normalcy)

The numbers below will be very telling over the next two weeks. If we see deaths across the U.S. increase at the same rate as cases (note, there is usually a two week delay between case spikes and deaths), the case for mandate becomes a little stronger. **But, right now, I would not advocate for a mandate.**

Happy to discuss.

Thanks!

<image005.jpg>

<image006.jpg>

**Kirk Limacher**  
VP, HR Services  
United Airlines | Corporate Support Center  
872.825.6294 – Office  
312.465.3629 -- Cell

**From:** Gebo, Kate <Kate.Gebo@united.com>

**APP.397**

**Sent:** Friday, July 23, 2021 8:47 AM  
**To:** Limacher, Kirk <kirk.limacher@united.com>

**Subject:** RE: Analysis needed: COVID cases since June 1st against vaccination status <Confidential>

Do you have a perspective on mandating?  
Kate

**From:** Limacher, Kirk <kirk.limacher@united.com>

**Sent:** Friday, July 23, 2021 7:01 AM

**To:** Gebo, Kate <Kate.Gebo@united.com>

**Subject:** FW: Analysis needed: COVID cases since June 1st against vaccination status <Confidential>

Good morning, Kate.

Following up on your question regarding the volume of COVID cases for vaccinated employees.

Details below, but in summary:

- Since June 1<sup>st</sup>, 32% of employees reporting a confirmed COVID case were fully vaccinated prior to getting COVID (70 out of 217 confirmed COVID cases)
- Pilots and Flight Attendants have the highest percentage of "breakthrough" COVID cases (61% and 41%), but they also have the highest percentage of reported vaccinations on file (due to the incentive programs)
- California shows the highest volume of confirmed cases (overall) since June 1<sup>st</sup>, but Illinois has the highest percentage of vaccinated employees getting COVID

Looking at the national news, several outlets are reporting 20-25% of new COVID cases are from fully vaccinated individuals. Given United's limited sample size, I think our 32% number aligns with the national average. While I've asked for a re-confirmation of our data, I believe that ZERO United hospitalization since June 1<sup>st</sup> have been fully vaccinated employees. And, as reported by the CDC, 99% of U.S. COVID-19 deaths last month were among unvaccinated people and more than 97% of recent hospitalizations have occurred among the unvaccinated.

In my opinion, COVID cases are here to stay for the foreseeable future. Continuing to promote vaccination at a local level is our best strategy right now (short of vaccination mandate).

Please let me know if you have any questions or would like to discuss.

Thanks!

**Kirk Limacher**

VP, HR Services

United Airlines | Corporate Support Center

872.825.6294 – Office

312.465.3629 -- Cell

**From:** Thacker, Bryan <bryan.thacker@united.com>

**Sent:** Thursday, July 22, 2021 4:29 PM

**To:** Limacher, Kirk <kirk.limacher@united.com>; Robb, Neil <neil.robb@united.com>; Curtis, Lee <mark.curtis@united.com>

**Cc:** Sharma, Garima <garima.sharma@united.com>

**Subject:** RE: Analysis needed: COVID cases since June 1st against vaccination status <Confidential>

Hi Kirk,

Number of confirmed cases has been added to the table below. Regarding hospitalizations: out of the 217 confirmed cases, 10 resulted in hospitalization, and 3 of those were fully vaccinated (all about 4 months after second dose). Let me know if you have any other questions.

**APP.398**



	Cases 2 Weeks After Full Vaccination	All Confirmed Cases	Percent of Confirmed Cases since June 1
Overall Total		70	217

Workgroup	Cases 2 Weeks After Full Vaccination	All Confirmed Cases	Percent of Confirmed Cases since June 1
Inflight		26	64
Management		6	12
Mechanics		0	17
Other		4	12
PCE		4	31
Pilots		20	33
Ramp		10	48

Work State	Cases 2 Weeks After Full Vaccination	All Confirmed Cases	Percent of Confirmed Cases since June 1
CA		21	61
CO		6	14
FL		4	15
IL		11	18
NJ		11	30
TX		6	41
VA		9	20

**Bryan Thacker**

Manager, People Analytics Solutions & Insights  
United Airlines | 233 S. Wacker Drive | Chicago, IL 60606  
Phone 872-825-3520 | [bryan.thacker@united.com](mailto:bryan.thacker@united.com)  
[united.com](http://united.com)

**From:** Thacker, Bryan

**Sent:** Thursday, July 22, 2021 4:09 PM

**To:** Limacher, Kirk <[kirk.limacher@united.com](mailto:kirk.limacher@united.com)>; Robb, Neil <[neil.robb@united.com](mailto:neil.robb@united.com)>; Curtis, Lee <[mark.curtis@united.com](mailto:mark.curtis@united.com)>

**Cc:** Sharma, Garima <[garima.sharma@united.com](mailto:garima.sharma@united.com)>

**Subject:** RE: Analysis needed: COVID cases since June 1st against vaccination status <Confidential>

Hi Kirk,

We've had 217 confirmed cases in active employees since June 1, and of those 70 (32%) were in fully vaccinated employees. That sounds high, but only 0.2% of all fully vaccinated employees have been sick after June 1 – so in reality this probably speaks to higher vaccination rates and declining covid rates overall. See breakdowns by workgroup and work state below.

Cases 2 Weeks After Full Vaccination	Percent of Confirmed Cases since June 1	Percent of Fully Vaccinated Employees
--------------------------------------	---	---------------------------------------

APP.399

Overall Total

76

32%

Workgroup	Cases 2 Weeks After Full Vaccination	Percent of Confirmed Cases in Workgroup	Percent of Employees
Inflight	26		41%
Management	6		50%
Mechanics	0		0%
Other	4		33%
PCE	4		13%
Pilots	20		61%
Ramp	10		21%

Work State	Cases 2 Weeks After Full Vaccination	Percent of Confirmed Cases in State	Percent of Employees
CA	21		34%
CO	6		43%
FL	4		27%
IL	11		61%
NJ	11		37%
TX	6		15%
VA	9		45%

Please let me know if you'd like to see anything else. Thanks!

**Bryan Thacker**

Manager, People Analytics Solutions & Insights  
 United Airlines | 233 S. Wacker Drive | Chicago, IL 60606  
 Phone 872-825-3520 | [bryan.thacker@united.com](mailto:bryan.thacker@united.com)  
[united.com](http://united.com)

**From:** Limacher, Kirk <[kirk.limacher@united.com](mailto:kirk.limacher@united.com)>

**Sent:** Thursday, July 22, 2021 9:04 AM

**To:** Robb, Neil <[neil.robb@united.com](mailto:neil.robb@united.com)>; Curtis, Lee <[mark.curtis@united.com](mailto:mark.curtis@united.com)>; Thacker, Bryan <[bryan.thacker@united.com](mailto:bryan.thacker@united.com)>

**Cc:** Sharma, Garima <[garima.sharma@united.com](mailto:garima.sharma@united.com)>

**Subject:** Analysis needed: COVID cases since June 1st against vaccination status <Confidential>

**Importance:** High

Hi,

I know we did some analysis in May regarding confirmed COVID cases and whether they were fully vaccinated (based on our records).

**Can we run this analysis again for COVID-19 cases since June 1, 2021?**

I am interested in:

- Overall percentages
- Breakdown of percentage by frontline workgroup
- State specific percentages for our hub states plus Florida

**APP.400**

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**UNITED\_SAMBRANO\_00085391**

Case 4:21-cv-01074-P Document 243-1 Filed 01/26/24 Page 46 of 329 PageID 8797  
@Thacker, Brian: Do you have access to data to complete this analysis again? Or, do you need something from Lee and/or Neil?

Thanks all!

**Kirk Limacher**

VP, HR Services

United Airlines | Corporate Support Center

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# **EXHIBIT 74**



## COVID-19 vaccine mandate: Leader talking points + Q&A

Last update July 28, 2021

### [FOR INTERNAL USE ONLY]

United is issuing a new policy mandating all U.S. employees be vaccinated against COVID-19 by October 1, 2021.

The most important messages to share:

- Effective Oct. 1, 2021, all employees are required to demonstrate proof of COVID-19 vaccination to qualify for employment at United or risk termination.
- Employees can upload copies of their vaccination cards to Flying Together to generate a "vaccine pass," confirming they are vaccinated against COVID-19.
- Employees who refuse to get vaccinated will face unpaid leave and/or termination.
- Questions on reasonable accommodation for medical or religious reasons should be directed to Help Hub.

### Who is required to be vaccinated against COVID-19 at United?

- All U.S. employees are required to get vaccinated and demonstrate proof of vaccination. International employees are exempt at this time.

### Why is getting the vaccine important?

- Getting the vaccine is really important for two reasons
  - It keeps you safe by helping prevent you from getting COVID-19 and
  - It keeps others safe by helping reduce the spread of COVID-19
- The sooner the vaccine is widely accessible and administered, the faster we will reach herd immunity in the U.S.
- Until we reach herd immunity, and following CDC guidance, we plan to continue to enforce a mandatory mask policy for customers and employees. Please also continue to socially distance and wash your hands frequently.

### Why are we requiring employees to get vaccinated?

- Our number one priority is to help keep employees safe.
- In January, Scott talked about our intention to make the vaccine mandatory for employees at some point but also made clear that we first need to know when and where our employees can get it.
- The vaccine is now widely available in the U.S. and is proven to protect against severe illness as well as the spread of the virus. The vaccine also protects against severe illness from breakthrough cases of the delta variant of the virus.

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- Getting your COVID-19 vaccine is the best thing you can do to protect yourself, your family and your colleagues and to ensure that our industry stays on track to recover and thrive.

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#### Which vaccines meet the requirements of our new policy?

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- Any COVID-19 vaccine that is approved by the FDA for emergency use authorization or general use is acceptable.

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#### What if I'm unable to be vaccinated for medical or religious reasons?

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- We've established a Reasonable Accommodate Process (RAP) for those unable to be vaccinated for medical or religious reasons. You can find more information or submit a claim on Help Hub.

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#### What happens if I refuse to get vaccinated and don't meet the criteria for a RAP?

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- You will be placed on unpaid leave and may be terminated.

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#### How do I prove I'm vaccinated?

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- Employees can upload copies of their vaccination cards to Flying Together to generate a "vaccine pass," confirming they are vaccinated against COVID-19.

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#### Where can I get vaccinated?

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- Do we still have any vaccine available at United clinics?

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#### Can I schedule a vaccine appointment on a work day?

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- No. Missing work for a vaccination appointment is not an authorized absence.
- Please schedule your vaccine after work or on your day off (including leverage shift/trip trading). In a few situations people feel ill following vaccination, but these symptoms typically dissipate in a few days. If you experience post-vaccination symptoms that prevent you from safely working, please use sick time until you are ready to return to work.

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#### Is the vaccine covered by our company medical insurance?

- There will be no cost to any employee to get the COVID-19 vaccine.
- You may be asked for your insurance card at your vaccine appointment, but there will be no charge to you for getting vaccinated

#### What does United do with my vaccine information?

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United already stores sensitive employee information, with our HR team managing an extensive set of personal and medical data, including Social Security Number, financial information, and medical information. We are storing your vaccination information under the same strict controls and limited access rules as other confidential data. The vaccination information you provide (at an individual level) will not be available to others outside of a small group within HR. Is the vaccine safe?

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- Yes! According to the CDC, the U.S. vaccine safety system ensures that all vaccines are as safe as possible.
- One of the most rigorous parts of the process is the clinical trials phase. Clinical trials conducted according to Food and Drug Administration (FDA) standards evaluate the vaccine in many thousands of trial participants. If the FDA determines a vaccine meets its safety and effectiveness standards, it can authorize a vaccine for use.

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- And testing and monitoring continues even after vaccine approval to ensure it's safe across larger populations.

Will the vaccine be mandatory for employees?

- Our number one priority is to help keep employees safe.
- Scott talked about our intention to make the vaccine mandatory for employees at some point but also made clear that we first need to know when and where our employees can get it.
- We've been a leader in putting health and safety at the forefront of our entire employee and customer experience throughout the COVID-19 crisis, from partnering with Cleveland Clinic and Clorox to launch United CleanPlus<sup>SM</sup>, to mandating masks, to introducing customer COVID-19 testing and contact tracing for customers on many international and domestic flights.
- A vaccine mandate only works if the vaccine is widely available to all of our U.S. employees, which we know is not yet the case. We encourage all employees to get vaccinated at first opportunity in their county or state.
- We are taking into consideration different laws and approaches country by country as well as a Reasonable Accommodate Process (RAP) for those unable to be vaccinated.
- You can expect additional communication about our policy in the near future.

How will the vaccine be distributed in the U.S.?

- Vaccine availability and distribution will be different for everyone depending on where you live and work, your age and your health history. While the CDC issued vaccine distribution guidelines, each state (and in some cases counties within states) is responsible for vaccination plan that makes sense locally, which means their approach may differ from the CDC. But vaccine distribution follows the same basic strategy:
  - Vaccine manufacturers ship to U.S. distribution points as directed by federal government (with our help!)
  - Federal government deploys vaccines based on population
  - State determines phased rollout
  - Rollout managed by county/city health agencies, health care providers, pharmacies, private companies or a combination of all.
- Employees are encouraged to check their local, county or state Department of Health for the latest information on who is eligible and when, as well as the local process for getting vaccinated.

How soon I can get vaccinated?

- For now, the CDC/ACIP guidelines places transportation workers — which includes airline workers — into phase 1C. This is ahead of the general population but behind other essential worker groups (ex. police officers are in Phase 1B as well as “public transit” workers)
- Because vaccine distribution is being organized state by state in the U.S., vaccine eligibility for airline workers will be different depending on where you live and work, your age and your health history.
- Check your local, county or state Department of Health for the latest information on eligibility and the local process for getting vaccinated.
- And if the opportunity arises to get vaccinated in your county or state — take it! Depending on where you live you may already be eligible to get vaccinated, no need to wait for guidance from United.

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~~Could I already be eligible for the vaccine based on where I live?~~

~~• Yes! In some states — like Florida, Texas and Virginia — healthcare professionals, residents ages 65+ and residents with qualifying preexisting health conditions are eligible to be vaccinated.~~

~~• In some states — like New York — transit workers including airline employees, are now eligible to receive the vaccine.~~

~~• And this information will continue to change daily depending on the availability of the vaccine and your local population.~~

~~• Check your local, county or state Department of Health for the latest information on eligibility and the local process for getting vaccinated.~~

~~Is there a pre-determined order to how the vaccine will be distributed among employees?~~

~~• No. Because vaccine distribution is being organized state by state in the U.S., vaccine eligibility for airline workers will be different depending on where you live and work, your age and your health history.~~

~~• United is not creating a pre-determined order for vaccine access.~~

~~• That's why if the opportunity arises to get vaccinated in your county or state — take it! Depending on where you live you may already be eligible to get vaccinated, no need to wait for guidance from United.~~

**Can I schedule a vaccine appointment on a work day?**

- ~~• No. Missing work for a vaccination appointment is not an authorized absence.~~
- ~~• Please schedule your vaccine after work or on your day off (including leverage shift/trip trading). In a few situations people feel ill following vaccination, but these symptoms typically dissipate in a few days. If you experience post-vaccination symptoms that prevent you from safely working, please use sick time until you are ready to return to work.~~

**Will employees be able to get vaccinated at our onsite clinics?**

- ~~• Yes. Employees may be able to get vaccinated at our Premise onsite clinics located at ORD, IAH, EWR, and GUM. Our teams are actively working with health departments and healthcare providers to provide vaccinations to eligible employees onsite when doses are available.~~
- ~~• At this time, our applications for ORD, IAH and EWR are pending state approval. We are actively working with government officials to try and expedite the process.~~
- ~~• We are also working to establish pop-up vaccination centers at other airports for United employees and are also working closely with airport authorities to establish multi-employer points of distribution at larger airports.~~
- ~~• We hope to have more details about these onsite offerings in the coming weeks and will provide more information as that becomes available.~~

**Should employees wait to get vaccinated at our onsite clinics?**

- ~~• No!! If the opportunity arises to get vaccinated in your county or state — take it! Depending on where you live you may already be eligible to get vaccinated, no need to wait for guidance from United.~~

**Are we requiring contractors and vendors to be vaccinated?**

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Will UAX and UGE employees be required to get vaccinated?

**Where can I learn more about vaccine safety and efficacy?**

- There are lots of great resources available about the COVID-19 vaccine, the testing process and certification process. [Here are a few](#) we've ~~already~~ shared with employees.

**Is the vaccine covered by our company medical insurance?**

- There will be no cost to any employee to get the COVID-19 vaccine.
- You may be asked for your insurance card at your vaccine appointment, but there will be no charge to you for getting vaccinated

**What should I do with the vaccination card?**

- Right now, both versions of the vaccine (Pfizer and Moderna) require two doses. It is important that you receive both doses in order to develop a high degree of immunity.
- When you receive your first and second dose of the vaccine, you will receive an immunization card.
- We recommend you take a picture of the card with your phone and also keep the card somewhere safe for future reference – you may be required to show proof of vaccine in the future for travel or other logistical reasons.

Other topics to address in town halls:

-incentives by workgroup (all ops)

-backfilling if an employee is on leave for refusing to get vaccinated (M&A)

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# **EXHIBIT 75**

From: HR Communication <hr.communication@united.com>  
 To: Limacher, Kirk  
 Sent: 1/14/2022 3:36:01 PM  
 Subject: Clarification regarding your approved RAP

## Clarification regarding your approved RAP



Happy New Year!

As part of your approved COVID-19 vaccine RAP, you are required to:

- Continue getting tested for COVID-19 and present negative results twice weekly
- Continue to wear KN95 masks at all times while at work, traveling, or training
- Continue to social distance from others

The conditions of your approved RAP require that you must wear your KN95 mask while at your workspace regardless of social distancing. Per the Safety Risk Assessment, if you are having difficulty communicating with an aircraft or other parties through your mask, you are allowed to temporarily lower your mask while speaking. **At the conclusion of that interaction**, you must immediately replace your mask when not actively speaking. With the KN95 mask, you are able to touch the mask and still continue to effectively use it.

If you have any questions about testing requirements please visit [Help Hub](#).

Thank you and stay safe.

## Your COVID-19 testing requirement starts November 3



United employee –

Our number one goal is to keep everyone – both vaccinated and unvaccinated employees – safe when they come to work every day.

That's why, when you were approved for and accepted your COVID-19 vaccination RAP, we communicated that we planned to institute specific safety measures for non-customer facing unvaccinated employees.

**You will no longer be placed on unpaid leave, but effective Nov. 3, 2021, as part of your RAP accommodation, you will be required to:**

- Get tested for COVID-19 and present negative results twice weekly
- Continue to wear N95 or KN95 masks at all times while at work, traveling, or training
- Continue to social distance from others

Following these safety measures is a requirement of your approved RAP. Failure to participate or uploading false testing information will result in discipline up to and including separation from United.

**How will the testing work?**

- Employees will be required to get tested for COVID-19 **twice every seven days**

APP.409

**and not more than once every two days.**

- Because employees are spread out across the system and have a variety of schedules depending on their role and location, United is not able to provide onsite testing. You must schedule your test on your personal time, and any type of test is acceptable (PCR, self-administered, etc.). [Click here](#) to find a testing center near you. You can also order at-home testing kits. Most testing options are either free or covered by United insurance, so United will not cover any out-of-pocket expenses for testing. We encourage you to line up your testing options in advance.
  - Your schedule will be adjusted to allow for 30 minutes per week for testing. When and how you get tested is up to you as long as you get tested twice every seven days and not more than once every two days.
- You'll upload your negative results to Flying Together after each test. **You can expect more information later this week on how and where to upload your results.**
- If you test positive, contact your local Business Office or supervisor.

**Masks and social distancing**

As a reminder, wearing a N95 or KN95 mask at all times while at work is a required safety measure of the RAP that you accepted. Masks can only be removed in high heat circumstances, while maintaining social distancing, or in between bites and sips. You can read more information about your mask usage [here](#).

**Questions?**

Please keep in mind these safety protocols may change at United's discretion as the pandemic environment shifts and updated guidance is provided from the federal government. If you have any questions about testing requirements please visit [Help Hub](#). For questions on your schedule, please contact your local business office.

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Update Profile | Constant Contact Data Notice  
Sent to kirk.limacher@united.com by hr.communication@united.com

**APP.410**

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**UNITED\_SAMBRANO\_00085643**

# **EXHIBIT 76**



**From:** Kate.Gebo@united.com  
**To:** Moran, Kaitlin  
**Sent:** 8/6/2021 7:20:08 PM  
**Subject:** Re: [EXTERNAL] Thanks

Hi Kate

I'll check to see what times could work.

I know you are likely interested in the employee response, but I just got this social media stat and thought you might find it interesting.

Since 6 a.m., we have seen **23,595 posts** related to United announcing we will require all U.S.-based employees to be vaccinated this fall. Posts related to this topic have made up **77% of all UA conversations** during the same timeframe and resulted in **132.7 billion potential impressions**. **Net sentiment related to the employee vaccine mandate is +53%.**

I'll get back to you shortly.

Kate

Sent from my iPad

On Aug 6, 2021, at 7:03 PM, Moran, Kaitlin <kmoran@visa.com> wrote:

Hi Kate,

It's lovely to meet you virtually and I look forward to connecting!

Would be great to grab a few minutes next week. Below are a few times that would work for me – let me know if any of these are convenient:

- Monday, August 9: 1-3pm PST
- Wednesday, August 11: 9-10:30am PST
- Friday, August 13: 11am-1pm PST

Thanks so much and have a great weekend!

Kate

**Kaitlin Moran** | Office of the CEO  
M: 650 868 0958 | E: [kmoran@visa.com](mailto:kmoran@visa.com)

**From:** Gebo, Kate <Kate.Gebo@united.com>  
**Sent:** Friday, August 6, 2021 2:33 PM  
**To:** Moran, Kaitlin <kmoran@visa.com>  
**Subject:** Fwd: [EXTERNAL] Thanks

Hi Kate,

I'm a Kate as well and was previously Chief of Staff to our CEO so we have lots in common! I now run HR and labor.

Let me know when it's convenient to talk and we can figure out what info might be most helpful for us to share

**APP.412**



Sent from my iPad

Begin forwarded message:

**From:** "Kelly, Al" <[al.kelly@visa.com](mailto:al.kelly@visa.com)>  
**Date:** August 6, 2021 at 4:50:06 PM EDT  
**To:** "Kirby, Scott" <[Scott.Kirby@united.com](mailto:Scott.Kirby@united.com)>  
**Cc:** "Moran, Kaitlin" <[kmoran@visa.com](mailto:kmoran@visa.com)>, "Gebo, Kate" <[Kate.Gebo@united.com](mailto:Kate.Gebo@united.com)>  
**Subject:** Re: [EXTERNAL] Thanks

Thanks Scott.

Al

Alfred F. Kelly Jr.  
Chairman and Chief Executive Officer  
Visa

---

**From:** Kirby, Scott <[Scott.Kirby@united.com](mailto:Scott.Kirby@united.com)>  
**Sent:** Friday, August 6, 2021 4:31:34 PM  
**To:** Kelly, Al <[al.kelly@visa.com](mailto:al.kelly@visa.com)>  
**Cc:** Moran, Kaitlin <[kmoran@visa.com](mailto:kmoran@visa.com)>; Gebo, Kate <[Kate.Gebo@united.com](mailto:Kate.Gebo@united.com)>  
**Subject:** Re: [EXTERNAL] Thanks

I'll add Kate and someone on her team can coordinate with Kaitlin.

Sent from my iPad

On Aug 6, 2021, at 3:21 PM, Kelly, Al <[al.kelly@visa.com](mailto:al.kelly@visa.com)> wrote:

Scott, thank you.

I would love to understand what happens as the days and weeks go by. I have copied Kate Moran who is my Chief of Staff and if someone can, in a simple way, keep her informed that would be great.

Have a nice weekend.

Al

Alfred F. Kelly Jr.  
Chairman and Chief Executive Officer  
Visa

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**From:** Kirby, Scott <[Scott.Kirby@united.com](mailto:Scott.Kirby@united.com)>  
**Sent:** Friday, August 6, 2021 4:05 PM  
**To:** Kelly, Al  
**Subject:** Re: [EXTERNAL] Thanks

Our team was really worried about that and I guess that time will tell definitively. But after hearing from the operating teams, they now think that it will ultimately be a single digit number of people that leave over this

APP.413

Case 4:21-cv-01074-P Document 243-1 Filed 01/26/24 Page 59 of 329 PageID 8810  
That's partly because the jobs are just going to leave (wide body pilot 400k/year, mechanic 150k, ramp worker 100k). So our experience may different than elsewhere but I don't think it will be that much.

Also, happy to get someone from your team in touch with my team if you want and can keep you informed as we see more real world data.

Sent from my iPad

On Aug 6, 2021, at 2:53 PM, Kelly, Al <al.kelly@visa.com> wrote:

This message was sent from outside of United Airlines. Please do not click links or open attachments unless you recognize the sender and know that the content is safe.

Scott, much thanks for your comments today and good for you on the vaccination mandate.

The one larger thing that gives me pause in following suit is what the consequences are if employees just don't comply. Obviously if it is a few or even a few hundred, you could elect to dismiss them but what if it is a 1000 employees or more.

Would love to to hear your views.

Thanks much.

Al

Alfred F. Kelly Jr.  
Chairman and Chief Executive Officer  
Visa

# **EXHIBIT 77**

**From:** Sucher, Kyle </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5E9E6DF095BF40E3B6D15B1B3B105D23-U343939>  
**To:** Robb, Neil  
**Sent:** 9/24/2021 1:18:14 PM  
**Subject:** FW: RAP

Should have forwarded this one, sorry

Kyle

**From:** Biddle, Rob <Rob.Biddle@united.com>  
**Sent:** Friday, September 24, 2021 12:03 PM  
**To:** [REDACTED]@united.com>  
**Cc:** Kate Gebo <KateGebo@united.com>; REDenial@protonmail.com  
**Subject:** RE: RAP

[REDACTED]  
Please call me to discuss. 303-348-3650

*Rob*

Captain Rob Biddle  
United Airlines Chief Pilot - Denver

**From:** [REDACTED]@united.com>  
**Sent:** Friday, September 24, 2021 10:46 AM  
**To:** Biddle, Rob <Rob.Biddle@united.com>  
**Cc:** Kate Gebo <KateGebo@united.com>; REDenial@protonmail.com  
**Subject:** RAP

Dear Capt Biddle ,

I am writing to reinstate my request for a reasonable accommodation based on my sincerely held, faith-based opposition or to United's mandatory vaccine policy. I only withdrew my exemption because I felt bullied and rushed in the short 5 calendar day timeline that United gave me. I also did not feel as though the accommodation was very reasonable. In my mind, it was a 6 year furlough. My sincerely held, faith-based reason for not taking the COVID-19 vaccine is essentially because I disagree with the immoral practice of using aborted fetal cells to create and/or use in a vaccine. Secondly, I feel that the vaccine is an unsafe risk to my health; and I cannot, in good conscious, take a vaccine that might defile the body that was entrusted to me by our Creator. I believe my body is not my own, but is a

APP.416



temple of the Holy Spirit.

Lastly, I have natural antibodies to the virus, and would like to trust Gods immune system over a manmade attempt at a vaccine.

Please advise me as to the next steps of this process.

Sincerely,

[REDACTED]

U234551

Get [Outlook for iOS](#)

**APP.417**

# **EXHIBIT 78**

**From:** Robb, Neil </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5102C14D51C44BBB87A82B14107B42AC-U368374>  
**To:** Kemp, Jennifer  
**Sent:** 8/13/2021 5:22:53 PM  
**Subject:** RE: Anonymous

Excellent, thanks

**From:** Kemp, Jennifer <Jennifer.Kemp@united.com>  
**Sent:** Friday, August 13, 2021 5:19 PM  
**To:** Robb, Neil <neil.robb@united.com>  
**Subject:** Re: Anonymous

It's now live so you and Kirk can take a look.

**KB0010558**

---

**From:** Robb, Neil <neil.robb@united.com>  
**Sent:** Friday, August 13, 2021 5:12 PM  
**To:** Kemp, Jennifer <Jennifer.Kemp@united.com>  
**Subject:** RE: Anonymous

Thank you!

**From:** Kemp, Jennifer <Jennifer.Kemp@united.com>  
**Sent:** Friday, August 13, 2021 5:10 PM  
**To:** Robb, Neil <neil.robb@united.com>; Jaleel, Aiman <aiman.jaleel@united.com>; Catanzano, Jessica <jessica.catanzano@united.com>  
**Subject:** RE: Anonymous

Made some edits:

## Reasonable Accommodation Policy & FAQs

KB0010558 - Latest Version (Draft)

426 views

In keeping with our commitment to equal employment opportunity for individuals in accordance with the Americans with Disabilities Act, United works with co-workers who have long term or permanent limitations to identify reasonable accommodations necessary to allow these individuals to apply for and to perform safely the essential functions of their jobs.

A reasonable accommodation is available to qualified applicants/employees with a disability or long term limitations. A qualified employee or applicant with a disability is a person who:

- Has a physical or mental impairment that substantially limits one or more major life activities (i.e. walking, talking, etc.)

**APP.419**



An accommodation is any change in the work environment or in the way things are customarily done that enables and individual with a disability to enjoy equal opportunities.

For more information on the Americans with Disabilities Act (ADA) please visit <http://www.ada.gov/>.

If an employee is having difficulty performing some aspect of his or her current job due to a medical condition or restriction, the employee should think about RAP. To initiate the RAP process an employee can submit their request through Help Hub via the **Reasonable Accommodation (RAP) form here**. There is no need to disclose the nature of the medical condition. The employee need only advise one of the above groups that he or she is having difficulty or anticipates having some difficulty performing some aspect of their job and would like to begin the RAP process.

- **RAP Based on a Medical Restriction:** You may have your health care provider complete the below form to receive information regarding the reasonable accommodation process or to submit your completed **Work Restriction Form**. Your doctor's office may also fax the completed form to United Medical at (1-847-700-2600) and a case will be opened for you by the ESC. **IF REQUEST IS FOR COVID-19 VACCINE, THIS FORM IS NOT REQUIRED. SUPPORTING MEDICAL DOCUMENTATION IS REQUIRED.**
- **RAP Based upon a Sincerely Held Religious Belief:** You will be asked to provide information regarding your request for a religious accommodation below. We will review your request. We may require a letter from your religious leader on their letterhead supporting your request for an accommodation pertaining to a religious belief.

Once the employee has requested the RAP process, they will be referred to a Medical Specialist or member of the Absence Management Team (for Religious requests) who will work with them through the entire RAP process. They will explain the RAP process to the employee and send out the initial RAP packet to them which includes a **Work Restriction Form** to be completed by the treating physician for them to indicate the specific restrictions that are related to the medical condition and the duration of the restrictions.

This information should be faxed directly to the United Medical Department (ESCMD) at 847-700-2600 for the nurses to review. Once ESCMD personnel have reviewed the employee's information and restrictions submitted from the medical provider and any follow up questions or requests for clarification have been addressed by the employee and their physician, ESCMD will document the specific restrictions, parameters and their duration on a form called "Assessment of Functional Capability" or AFC. The AFC is the basis for discussion during the RAP meeting. Restrictions will be reviewed and verified with the employee by ESCMD prior to scheduling the RAP meeting. Once validated, the AFC will be forwarded to the RAP Specialist who will assist with scheduling the employee's RAP session. If an employee disagrees with the restrictions on the AFC, the employee will have the opportunity to have further discussion with their medical provider responsible for the original submission of restrictions to United and may supplement additional medical information and clarification for additional review.

Once an AFC is finalized and signed by the employee, the RAP meeting will be scheduled. The RAP Specialist will schedule the meeting and notify local management, the HR Partner and the employee of the date, time and location of the RAP meeting. In attendance at the RAP meeting are the RAP Specialist who facilitates the meeting along with the employee, supervisor/manager with knowledge of the employee's current position and day to day duties, the local HR Partner, and in some instances a worker's compensation Representative, (if an occupational injury is involved imposing restrictions). During the RAP meeting, the employee's medical restrictions are reviewed and discussed in an effort to identify any reasonable accommodation that will enable the employee to perform the essential functions of the employee's current position.



### **What is the employee's responsibility when initiating this process?**

Immediately notify your supervisor or the Medical Specialist of any medical restrictions that limit or prevent performance of your essential job functions. You will be provided a copy of your job description for review by your treating specialist and a Work Restriction form for him/her to complete and submit directly to Medical at fax # 847.700.2600. Please ensure your specialist has included the medical facts, the specific physical restrictions (cannot lift more than 45 lbs. or must walk with a cane or cannot stand without medical documentation to support permanent or long term medical restriction.

Your health care provider can submit a completed Work Restriction Form to our medical specialist at fax 847-700-2600 if your work groups participates in RAP shared services otherwise contact your local management. The Work Restriction Form can be found here: [Work Restriction Form](#). For COVID-19 medical accommodation requests you may use this [form](#).

### **How do I request a Reasonable Accommodation?**

If your health care provider has determined you have a long term or permanent disability that would interfere with performing your essential functions of your job and you are interested in pursuing the Reasonable Accommodation Program please submit your inquiry via Help Hub using the [Reasonable Accommodation \(RAP\) Inquiry](#) here. You may also call the ESC at 877-UAL-ESC9 (877-825-3729) and a representative will advise in detail the information needed to begin the RAP process.

Thank You,

***Jennifer Kemp***

Workforce Manager

United | Corporate Support Center

233 South Wacker Drive, 25th Floor, WHQMW | Chicago, IL 60606

Tel. 630-204-7546

**From:** Robb, Neil <[neil.robb@united.com](mailto:neil.robb@united.com)>

**Sent:** Friday, August 13, 2021 4:48 PM

**To:** Jaleel, Aiman <[aiman.jaleel@united.com](mailto:aiman.jaleel@united.com)>; Kemp, Jennifer <[Jennifer.Kemp@united.com](mailto:Jennifer.Kemp@united.com)>; Catanzano, Jessica <[jessica.catanzano@united.com](mailto:jessica.catanzano@united.com)>

**Subject:** RE: Anonymous

The article itself looks fine. We have nothing in there about COVID-19 vaccine RAP.

Adding [@Catanzano, Jessica](#) and [@Kemp, Jennifer](#) to see if we should add anything in here.

**From:** Jaleel, Aiman <[aiman.jaleel@united.com](mailto:aiman.jaleel@united.com)>

**Sent:** Friday, August 13, 2021 3:58 PM

**To:** Robb, Neil <[neil.robb@united.com](mailto:neil.robb@united.com)>

**Subject:** RE: Anonymous

It appears the KB article was in draft mode, I'm pushing it to publish but did you want to take a peak to make sure it has everything you need before I make it go live?

[https://united.service-now.com/hrportal?id=kb\\_article&sysparm\\_article=KB0010558&sys\\_kb\\_id=1d97e95adb110c509e3b79398c9619e6&spa=1](https://united.service-now.com/hrportal?id=kb_article&sysparm_article=KB0010558&sys_kb_id=1d97e95adb110c509e3b79398c9619e6&spa=1)

**APP.421**

Thank you,

**Aiman Jaleel**

Senior Specialist – HR Tools & Innovation

Tel. 847.700.4955 | [aiman.jaleel@united.com](mailto:aiman.jaleel@united.com)

**From:** Robb, Neil <[neil.robb@united.com](mailto:neil.robb@united.com)>

**Sent:** Friday, August 13, 2021 3:23 PM

**To:** Jaleel, Aiman <[aiman.jaleel@united.com](mailto:aiman.jaleel@united.com)>

**Subject:** FW: Anonymous

Hello Aiman. Any thoughts on why this would be happening?

**From:** Limacher, Kirk <[kirk.limacher@united.com](mailto:kirk.limacher@united.com)>

**Sent:** Friday, August 13, 2021 3:17 PM

**To:** Robb, Neil <[neil.robb@united.com](mailto:neil.robb@united.com)>

**Subject:** Anonymous

I am currently on Help Hub for RAP policy. When you click on the "reasonable accommodation policy", it loads and says "knowledge record not found"...can you have someone look into that so we can view the information we need?

**Kirk Limacher**

VP, HR Services

United Airlines | Corporate Support Center

872.825.6294 – Office

312.465.3629 -- Cell

**APP.422**

# **EXHIBIT 79**



**From:** Robb, Neil </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5102C14D51C44BBB87A82B14107B42AC-U368374>  
**To:** Corey, Rachel  
**Sent:** 8/13/2021 11:50:10 AM  
**Subject:** RE: Question about RAP processing time  
**Attachments:** image001.jpg; image002.jpg

I think so. We are learning a lot through this process and handling each case separately.

**From:** Corey, Rachel <Rachel.Corey@united.com>  
**Sent:** Friday, August 13, 2021 11:31 AM  
**To:** Robb, Neil <neil.robb@united.com>  
**Subject:** RE: Question about RAP processing time

It sounds like it will be religious and they haven't applied yet, but are being instructed to do so immediately. I have a feeling it will be declined, because I think I have a sense it's not coming from a church like 7<sup>th</sup> Day Adventist or Jehovah's Witnesses who have a prohibition against vaccines, but more from someone who's going to ask their pastor, who may or may not provide something. We'll see.

Either way, 1-2 weeks is a reasonable estimate!

**Rachel Corey**  
Sr. Manager, Human Resources, Employee Relations  
PR/Communications Chair – Bridge  
United | Human Resources  
233 S. Wacker Drive 25th Floor | Chicago, IL 60606  
Call me via MS Teams | [rachel.corey@united.com](mailto:rachel.corey@united.com)



**From:** Robb, Neil <[neil.robb@united.com](mailto:neil.robb@united.com)>  
**Sent:** Friday, August 13, 2021 11:25 AM  
**To:** Corey, Rachel <[Rachel.Corey@united.com](mailto:Rachel.Corey@united.com)>  
**Subject:** RE: Question about RAP processing time

Hello Rachel.

I am keeping my head up for sure. Thanks for asking. I trust you are well.

It is a difficult question to ask. Did the employee state whether the request was medical or religious in nature? Either way, we are taking each one a case at a time and the time to get to a decision varies. Could take a week or two. Wish I had more info to share.

**From:** Corey, Rachel <[Rachel.Corey@united.com](mailto:Rachel.Corey@united.com)>  
**Sent:** Friday, August 13, 2021 11:12 AM  
**To:** Robb, Neil <[neil.robb@united.com](mailto:neil.robb@united.com)>  
**Subject:** Question about RAP processing time

Hi Neil – hope you are doing well and keeping your head up, amidst the craziness. I was wondering if you had

**APP.424**



an estimate of RAP processing times related to the vaccine requirements, assuring an employee is responding quickly with documentation. My guess is that it may be hard to estimate, but I'll tell you why I'm asking.

I have an open offer situation for an L3 position, and the person who has been selected for the role has indicated that they are applying for a RAP and if they are not granted the RAP that they will be leaving United in some way shape or form (either quitting or getting termed in November). They've advised the hiring manager that they should go with the second choice for the L3 position if their RAP is not granted.

I informed the hiring manager that only a small percentage of RAPs are expected to be granted, however I would check and see how long it may be taking right now with volumes.

Let me know if this is something you could guesstimate or if it's too hard to tell at this time.

Thanks so much,

**Rachel Corey**

Sr. Manager, Human Resources, Employee Relations

PR/Communications Chair – Bridge

United | Human Resources

233 S. Wacker Drive 25th Floor | Chicago, IL 60606

Call me via MS Teams | [rachel.corey@united.com](mailto:rachel.corey@united.com)



# **EXHIBIT 80**

**From:** Fiore, Kristin </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6C538221B8554A2DA78C273F7064DE18-U277861>  
**To:** Lescallett, Gary - OSHA  
**CC:** Zentner, Todd - OSHA; Edwards, Averil; Johnson, Sasha; Conneely, James; Rundman, Sven - OSHA; Kim, Jennifer M. - OSHA; kmcMahon@connmaciel.com  
**Sent:** 11/5/2021 4:28:35 PM  
**Subject:** RE: OSHA Respirator Complaints (Nos. 1818965 and 1818881) Follow-up  
**Attachments:** OSHA Respiratory Protection COVID-19 Long Term Care.pdf; United Airlines Research on KN95s\_.docx

Hi Gary,

Thank you very much for reaching out to us and for pulling together the group of your colleagues from OSHA to speak with us earlier this week. United Airlines very much appreciates OSHA's interest in working with us to resolve the complaints that have been lodged in a manner that supports our efforts to continue implementation of our hard vaccine mandate policy and our desire to continue to incent and encourage our employees to become vaccinated.

As we discussed during our call this week, the various complaints that have been raised with multiple different OSHA offices across the country seem timed to correlate with the lawsuit that was filed against United by the employees who have refused to get vaccinated and have requested accommodations based on their "sincerely held religious beliefs." The thorny issues related to these claims and accommodation requests will ultimately be addressed by the courts, but, in the meantime, we want to do everything we can to ensure that we protect the vast majority of our employees who complied with our vaccine policy. It is also imperative that we take all available steps to protect our customers who are in contact with our employees.

Based on these considerations, we developed what we considered a voluntary use policy, allowing the unvaccinated employees to choose to wear either an N95 or a KN95 (or to get vaccinated or take personal leave). As we discussed, we viewed the mask requirement as a source control strategy to protect our vaccinated workforce and our customers by attempting to lessen the likelihood that unvaccinated personnel could transmit COVID-19 at our worksites.

Having said this, if it would be helpful to OSHA in resolving and closing the complaints that have been lodged against United by these unvaccinated employees, we are willing to revise our current policy to eliminate the N95 option, and work with our procurement and distribution teams to provide only KN95s to these employees. While we understand there may have been some confusion at some point and/or some conflicting views about KN95s, at this time we believe OSHA and other experts have concluded that KN95s are not respirators regulated under OSHA's respiratory protection program.

We hope this revision to our policy (and corresponding action in offering only KN95s to these employees) would eliminate any concerns OSHA might have about our vaccine policy. It will take us just a bit of time to ensure only KN95s are being distributed within the field, but we are certainly willing to take this step in an effort to partner with OSHA to ensure there remain no questions as to United's compliance with all applicable regulatory obligations.

Once you have a chance to discuss this with your colleagues, please let us know if this would be helpful. We look forward to hearing from you.

Also, per your request, attached is an email we asked our counsel, Kate McMahon to provide, which summarizes the information she has gathered regarding KN95s. Also attached is the OSHA guidance document that Kate mentioned in our call and some other materials from the CDC and the FDA that she thought might be instructive.

Thank you very much Gary. Again, we appreciate your interest in working cooperatively with United Airlines to

APP.427



address this challenging situation.

Kristin

**Kristin Fiore** (*she/her/hers*)

Managing Director – Corporate Safety

United | 233 S. Wacker Drive WHQSY | Chicago, IL

Tel. 872 825 6385 | Mobile 773 294 2422 | [kristin.fiore@united.com](mailto:kristin.fiore@united.com)

**From:** Lescallett, Gary - OSHA <[Lescallett.Gary@dol.gov](mailto:Lescallett.Gary@dol.gov)>

**Sent:** Wednesday, November 3, 2021 5:12 PM

**To:** Fiore, Kristin <[Kristin.Fiore@united.com](mailto:Kristin.Fiore@united.com)>

**Cc:** Zentner, Todd - OSHA <[Zentner.Todd@dol.gov](mailto:Zentner.Todd@dol.gov)>; Edwards, Averil <[averil.edwards@united.com](mailto:averil.edwards@united.com)>; Johnson, Sasha <[Sasha.Johnson@united.com](mailto:Sasha.Johnson@united.com)>; Conneely, James <[james.conneely@united.com](mailto:james.conneely@united.com)>; Rundman, Sven - OSHA <[rundman.sven@dol.gov](mailto:rundman.sven@dol.gov)>; Kim, Jennifer M. - OSHA <[Kim.Jennifer.M@dol.gov](mailto:Kim.Jennifer.M@dol.gov)>

**Subject:** OSHA Respirator Complaints (Nos. 1818965 and 1818881) Follow-up

Ms. Fiore:

Thank you again to you and your team for agreeing to meet with OSHA on short notice. I don't have Ms. McMahon's email, but I wanted to communicate that we would be interested in reviewing the information she referred to regarding KN95 respirators during our call today. If you could please forward it to us we would appreciate it.

We look forward to hearing from you and your team after you've had the opportunity to review and discuss our call.

Thank you for your time.

Gary Lescallett

**From:** Fiore, Kristin <[Kristin.Fiore@united.com](mailto:Kristin.Fiore@united.com)>

**Sent:** Tuesday, November 2, 2021 11:17 AM

**To:** Lescallett, Gary - OSHA <[Lescallett.Gary@dol.gov](mailto:Lescallett.Gary@dol.gov)>

**Cc:** Zentner, Todd - OSHA <[Zentner.Todd@dol.gov](mailto:Zentner.Todd@dol.gov)>; Edwards, Averil <[averil.edwards@united.com](mailto:averil.edwards@united.com)>; Johnson, Sasha <[Sasha.Johnson@united.com](mailto:Sasha.Johnson@united.com)>; Conneely, James <[james.conneely@united.com](mailto:james.conneely@united.com)>

**Subject:** RE: [EXTERNAL] OSHA Respirator Complaints (Nos. 1818965 and 1818881)

CAUTION - The sender of this message is external to the DOL network. Please use care when clicking on links and responding with sensitive information. Send suspicious email to [spam@dol.gov](mailto:spam@dol.gov).

Hi Gary,

Yes, we can make 3:30PM CDT work tomorrow. Would you like us to set up a Teams meeting or will you be setting it up?

Thanks,  
Kristin

APP.428



**From:** Lescallett, Gary - OSHA <[Lescallett.Gary@dol.gov](mailto:Lescallett.Gary@dol.gov)>

**Sent:** Tuesday, November 2, 2021 10:57 AM

**To:** Fiore, Kristin <[Kristin.Fiore@united.com](mailto:Kristin.Fiore@united.com)>

**Cc:** Zentner, Todd - OSHA <[Zentner.Todd@dol.gov](mailto:Zentner.Todd@dol.gov)>; Edwards, Averil <[averil.edwards@united.com](mailto:averil.edwards@united.com)>; Johnson, Sasha <[Sasha.Johnson@united.com](mailto:Sasha.Johnson@united.com)>; Conneely, James <[james.conneely@united.com](mailto:james.conneely@united.com)>

**Subject:** RE: [EXTERNAL] OSHA Respirator Complaints (Nos. 1818965 and 1818881)

Thank you for your message and proposed time. We unfortunately had a meeting get moved. Would 3:30 CDT work for everyone?

**From:** Fiore, Kristin <[Kristin.Fiore@united.com](mailto:Kristin.Fiore@united.com)>

**Sent:** Tuesday, November 2, 2021 10:40 AM

**To:** Lescallett, Gary - OSHA <[Lescallett.Gary@dol.gov](mailto:Lescallett.Gary@dol.gov)>

**Cc:** Zentner, Todd - OSHA <[Zentner.Todd@dol.gov](mailto:Zentner.Todd@dol.gov)>; Edwards, Averil <[averil.edwards@united.com](mailto:averil.edwards@united.com)>; Johnson, Sasha <[Sasha.Johnson@united.com](mailto:Sasha.Johnson@united.com)>; Conneely, James <[james.conneely@united.com](mailto:james.conneely@united.com)>

**Subject:** RE: [EXTERNAL] OSHA Respirator Complaints (Nos. 1818965 and 1818881)

CAUTION - The sender of this message is external to the DOL network. Please use care when clicking on links and responding with sensitive information. Send suspicious email to [spam@dol.gov](mailto:spam@dol.gov).

Good morning Gary,

We are happy to have a call with you and Todd. Would tomorrow (11/3/22) at 4PM central work for you both?

Thanks,  
Kristin

**From:** Lescallett, Gary - OSHA <[Lescallett.Gary@dol.gov](mailto:Lescallett.Gary@dol.gov)>

**Sent:** Monday, November 1, 2021 3:06 PM

**To:** Fiore, Kristin <[Kristin.Fiore@united.com](mailto:Kristin.Fiore@united.com)>

**Cc:** Zentner, Todd - OSHA <[Zentner.Todd@dol.gov](mailto:Zentner.Todd@dol.gov)>

**Subject:** [EXTERNAL] OSHA Respirator Complaints (Nos. 1818965 and 1818881)

This message was sent from outside of United Airlines. Please do not click links or open attachments unless you recognize the sender and know that the content is safe.

Good afternoon Ms. Fiore:

My name is Gary Lescallett and I am the Region V - Assistant Regional Administrator for Enforcement located in Chicago, Illinois. Mr. Todd Zentner is my counterpart in Region VIII for Enforcement and he is located in Denver, Colorado. As you know, each of our Regions as well as several others have received complaints regarding United Airlines policy associated with the use of N95 and KN95 respirators. After reviewing your response, there are a few questions and/or concerns we with your response letter.

We would like to set up a call with you to discuss your response letter and to communicate our questions/concerns. OSHA has received a number of complaints across the country, therefore, resolving this matter quickly is mutually beneficial. I would anticipate the call would last approximately 30 minutes. The agency appreciates United's commitment to protecting employees in the workplace and its efforts to institute a COVID-19 vaccination policy across the company.

Proposed Dates: November 2nd or 3<sup>rd</sup>, 2021

Time: 3:30 CDT/2:30 MDT

APP.429

Microsoft Teams. OSHA can send out a link.

Estimated Duration: 30 minutes

Sincerely,

Gary Lescallett

Assistant Regional Administrator for Enforcement

OSHA Region V – Chicago

312-438-7034

**APP.430**

# **EXHIBIT 81**



**From:** Knezevic, Heather </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=8053C1BE905A4E9E84FE8DE8E63AEF48-U368161>  
**To:** Fiore, Kristin; Johnson, Sasha  
**Sent:** 11/16/2021 5:06:31 PM  
**Subject:** Fwd: Broll for VACCINE recognition/FOR REVIEW

Hi Kristin/Sasha,

In this video that will play on screens in the United Center for LC on Thursday-what info do you think we should we blur out on people's vaccination cards?

Clinic & Vaccine Cards: <https://vimeo.com/user87016723/review/646630461/e37e0fcaf0>

Thank you for weighing in.

Begin forwarded message:

**From:** "Reinglass, Dana" <dana.reinglass@united.com>  
**Date:** November 16, 2021 at 4:13:15 PM CST  
**To:** "Knezevic, Heather" <heather.knezevic@united.com>, "Ward, Amy" <Amy.Ward01@united.com>  
**Subject:** RE: Broll for VACCINE recognition/FOR REVIEW

Probably best to ask Kristin/Sasha.  
I feel like you're going to need to blur.

**From:** Knezevic, Heather <heather.knezevic@united.com>  
**Sent:** Tuesday, November 16, 2021 4:06 PM  
**To:** Ward, Amy <Amy.Ward01@united.com>; Reinglass, Dana <dana.reinglass@united.com>  
**Subject:** RE: Broll for VACCINE recognition/FOR REVIEW

Totally on board with that. Are we okay with keeping names and kind of vaccine—but blurring out any other personal info like DOB, etc.

**From:** Ward, Amy <Amy.Ward01@united.com>  
**Sent:** Tuesday, November 16, 2021 4:01 PM  
**To:** Knezevic, Heather <heather.knezevic@united.com>; Reinglass, Dana <dana.reinglass@united.com>  
**Subject:** Re: Broll for VACCINE recognition/FOR REVIEW

I think this looks great. My only small note was that I think we should blur some of the info on the vaccine cards for privacy purposes.

**From:** "Knezevic, Heather" <heather.knezevic@united.com>  
**Date:** Tuesday, November 16, 2021 at 3:43 PM  
**To:** "Reinglass, Dana" <dana.reinglass@united.com>, "Ward, Amy" <Amy.Ward01@united.com>  
**Cc:** "Knezevic, Heather" <heather.knezevic@united.com>  
**Subject:** Broll for VACCINE recognition/FOR REVIEW

Hi friends,

Here are links to the 2 stringouts for Vaccine Recognition, where each will roll is noted in script below.

First Flight

Clinic & Vaccine Cards: <https://vimeo.com/user87016723/review/646630461/e37e0fcaf0>

APP.432



(GERRY)

As I'm sure many of you will agree, Thanksgiving last year was pretty memorable... It was special, but much smaller to help keep everyone in my family as safe as possible.

For me, it was especially memorable because I was at home on Friday, November 27<sup>th</sup> when I heard the news that

**\*\*WILL ROLL FIRST VACCINE BROLL HERE\*\***

a United 777-200 from Brussels had just touched down at O'Hare, carrying the very first shipment of the long-awaited COVID-19 vaccine to the U.S.

When that 777 touched down, it was a proud moment for our company. The delivery and transportation of this vaccine was one of the largest logistical undertakings in history. For United to be leading these efforts in our industry was a defining moment that showed exactly what our operation can do. We set up a COVID readiness task force that included cross-functional experts and influencers from the entire airline. From the engineers in Tech Ops to the folks onloading and offloading the cargo, everybody understood just how important this was. And to this day, the United team has helped deliver this lifesaving vaccine to millions around the world. And November 27<sup>th</sup> was just the beginning.

A month later, in December, the first vaccine dose was administered to a nurse in New York State. When it came to vaccine distribution... there were a lot of questions, a lot of unknowns about who would get it first, and when. Communication and coordination between federal, state and local governments was a challenge because no one had done anything like this, at this scale, before. And so our Government Affairs team had their work cut out for them. Advocating for our employees to be as close to the front of the line and get access as soon as possible, was really their mission. And it was something they accomplished.

**\*\*WILL ROLL CLINIC/VACCINE BROLL HERE\*\***

Within a month or so, we had clinics in Guam, Chicago, Houston and Newark distributing vaccines to employees. Over a period of five months, we administered **12,200 doses to United employees, family members, and flying partners.**

(KATE)

We were really ahead of the curve across the board. And that's what allowed us to be one of the only carriers, if not the only carrier, to have this type of clinic model set up across our network.

One of the things that set us up for success was pulling a team together on this early, which meant working on this long before things were clearly spelled out. And now we're seeing many companies in different industries who are scrambling to get it figured out. But at United - we started having these conversations over a year ago, and that gave us a huge advantage.

The employee education piece was initially the big push—Figuring out how do we get all of this information out to our employees to help them understand what we're doing and more importantly, *why* we're doing it.

Our communication plan was built to provide consistent, transparent updates and constant opportunities for employees to understand all vaccination options available to them. Throughout the winter and spring, our Corporate Safety and Health & Wellness teams engaged public health experts to answer questions and debunk myths.

We also knew it was important to respect each person's individual situation and have highly personal conversations. Operations leaders walked the concourse engaging in small group and one-on-one conversations, addressing hesitancy and encouraging employees to get the shot.

Finally, we leveraged the power of storytelling, with regular United Daily features highlighting colleagues'

**APP.433**



personal experiences of getting vaccinated.

Seeing such large numbers of our employee family taking the steps to get vaccinated was encouraging. And then, this past summer, the summer Delta Variant reminded us that there was still hard work ahead, and it was clear we had to take swift, strong action.

Scott first proposed a vaccine mandate back at Earnings Live in January and by August about (60-70%) of our workforce had uploaded their vaccination records. But that wasn't enough to keep our employees and the customers we serve safe. We decided we could – and should – move forward with our own vaccine requirement.

As one of the first companies with a company-wide vaccine mandate, we were writing the playbook.

Labor discussions, thousands of reasonable accommodation adjudications, writing and rewriting policy – the process details were critical to get right. A dedicated team spent countless hours scenario planning, analyzing data and assessing areas where we had lower compliance.

Behind the scenes, the Digital Technology team designed, developed and deployed a vaccine status tracker before any other large businesses were doing so. To date, we have collected hundreds of thousands of vaccination records.

Despite the challenges, we knew we were doing the right thing. We always have been and always will be steadfast in our commitment to keep our employees and customers safe. And by September 27, 2021 with the exception of employees on an approved RAP, 99.7% of our employees were fully vaccinated.

Employers from around the country are reaching out to United every day, and asking "how did you do it"; "How did we get such high participation rates"?

The short answer? It was thanks to all of the leaders in this room today. You put safety first.

Because of your leadership, we have saved countless lives. And as you heard earlier, those wheels touching down on November 27, 2020 was just the beginning, as United continually steps up to take care of all those we serve. I know, and you know, that United is not measured by what we say, but by what we do. And when we live out our purpose with intention, we can truly be a force for good.

So thank you. To every single person involved in the vaccine rollout. To everyone here and listening online. Please join me in welcoming a few of the leaders who made this initiative a success:

# **EXHIBIT 82**

**From:** Muenkel, Dan </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7E9C477B2C43446BA377C4736E28AEE0-U353299>  
**To:** Catanzano, Jessica; Roman, Gladys; Millichap, Stephanie; Limacher, Kirk; Hodges, Michelle  
**Sent:** 8/30/2021 1:41:20 PM  
**Subject:** RE: FINAL REVIEW: COVID-19 vaccine postcards proof

Agreed, and it also looks good to me. Thanks!

**Dan Muenkel**  
Managing Director – Employee Experience / People Analytics / HR PMO  
Tel 872.825.4361 | Mobile 224.201.5816

**From:** Catanzano, Jessica <jessica.catanzano@united.com>  
**Sent:** Monday, August 30, 2021 1:18 PM  
**To:** Roman, Gladys <gladys.roman@united.com>; Millichap, Stephanie <Stephanie.Millichap@united.com>; Limacher, Kirk <kirk.limacher@united.com>; Hodges, Michelle <Michelle.Hodges@united.com>  
**Cc:** Muenkel, Dan <Dan.Muenkel@united.com>  
**Subject:** RE: FINAL REVIEW: COVID-19 vaccine postcards proof

Looks good to me. I thought about pulling out the Moderna line, but frankly, it just drives it home that time is of the essence.

---

**Jessica Catanzano, SPHR**  
HR Project Manager

United | Willis Tower 233 S. Wacker Dr. | Chicago, IL 60606  
P (872) 825.5536 | [jessica.catanzano@united.com](mailto:jessica.catanzano@united.com) | [united.com](http://united.com)

**From:** Roman, Gladys <gladys.roman@united.com>  
**Sent:** Monday, August 30, 2021 1:01 PM  
**To:** Millichap, Stephanie <Stephanie.Millichap@united.com>; Catanzano, Jessica <jessica.catanzano@united.com>; Limacher, Kirk <kirk.limacher@united.com>; Hodges, Michelle <Michelle.Hodges@united.com>  
**Cc:** Muenkel, Dan <Dan.Muenkel@united.com>  
**Subject:** FINAL REVIEW: COVID-19 vaccine postcards proof

Hi all,

Attached is the final proof for the postcards. Approved? I'm hoping we can give Creative Services the greenlight to send it to the printers within the next hour.

Thanks,  
Gladys

**From:** Millichap, Stephanie <Stephanie.Millichap@united.com>  
**Sent:** Monday, August 30, 2021 7:04 AM  
**To:** Roman, Gladys <gladys.roman@united.com>; Catanzano, Jessica <jessica.catanzano@united.com>; Limacher, Kirk <kirk.limacher@united.com>; Hodges, Michelle <Michelle.Hodges@united.com>  
**Cc:** Muenkel, Dan <Dan.Muenkel@united.com>  
**Subject:** Re: FOR REVIEW: COVID-19 vaccine postcards proof

APP.436



Let's just go with "complete." Thanks.

## Get Outlook for iOS

---

**From:** Roman, Gladys <[gladys.roman@united.com](mailto:gladys.roman@united.com)>  
**Sent:** Monday, August 30, 2021 7:02:34 AM  
**To:** Catanzano, Jessica <[jessica.catanzano@united.com](mailto:jessica.catanzano@united.com)>; Limacher, Kirk <[kirk.limacher@united.com](mailto:kirk.limacher@united.com)>; Hodges, Michelle <[Michelle.Hodges@united.com](mailto:Michelle.Hodges@united.com)>; Millichap, Stephanie <[Stephanie.Millichap@united.com](mailto:Stephanie.Millichap@united.com)>  
**Cc:** Muenkel, Dan <[Dan.Muenkel@united.com](mailto:Dan.Muenkel@united.com)>  
**Subject:** RE: FOR REVIEW: COVID-19 vaccine postcards proof

That's a bit wordy, but if we're getting questions and some employees are confused, I think spelling it out the way you have it makes sense.

Creative Services is working on these edits this morning, we should have the final version before noon today.

Thanks,  
Gladys

---

**From:** Catanzano, Jessica <[jessica.catanzano@united.com](mailto:jessica.catanzano@united.com)>  
**Sent:** Friday, August 27, 2021 6:04 PM  
**To:** Limacher, Kirk <[kirk.limacher@united.com](mailto:kirk.limacher@united.com)>; Roman, Gladys <[gladys.roman@united.com](mailto:gladys.roman@united.com)>; Hodges, Michelle <[Michelle.Hodges@united.com](mailto:Michelle.Hodges@united.com)>; Millichap, Stephanie <[Stephanie.Millichap@united.com](mailto:Stephanie.Millichap@united.com)>  
**Cc:** Muenkel, Dan <[Dan.Muenkel@united.com](mailto:Dan.Muenkel@united.com)>  
**Subject:** RE: FOR REVIEW: COVID-19 vaccine postcards proof

Can we please change this line?

Every U.S.-based United employee is required to receive a COVID-19 vaccine – it sounds like they only need one vaccine ("a vaccine")

Please change to : Every U.S.-based United employee is required to received two doses of a two dose vaccine or one dose of a single dose vaccine ...etc. @Millichap, Stephanie is going to throw up all over that, but we need to somehow clarify – and we cannot use the word "full" or "fully" – it has caused a lot of confusion with the 14 day thing. Complete could work, or we spell it out like I did.

---

**Jessica Catanzano, SPHR**  
HR Project Manager

United | Willis Tower 233 S. Wacker Dr. | Chicago, IL 60606  
' (872) 825.5536 | [jessica.catanzano@united.com](mailto:jessica.catanzano@united.com) | [united.com](http://united.com)

---

**From:** Limacher, Kirk <[kirk.limacher@united.com](mailto:kirk.limacher@united.com)>  
**Sent:** Friday, August 27, 2021 5:28 PM  
**To:** Roman, Gladys <[gladys.roman@united.com](mailto:gladys.roman@united.com)>; Hodges, Michelle <[Michelle.Hodges@united.com](mailto:Michelle.Hodges@united.com)>; Catanzano, Jessica <[jessica.catanzano@united.com](mailto:jessica.catanzano@united.com)>  
**Cc:** Millichap, Stephanie <[Stephanie.Millichap@united.com](mailto:Stephanie.Millichap@united.com)>; Muenkel, Dan <[Dan.Muenkel@united.com](mailto:Dan.Muenkel@united.com)>  
**Subject:** RE: FOR REVIEW: COVID-19 vaccine postcards proof

Overall, looks great.

- On page 1, can we make the following line stand out more, "Unvaccinated employees without a reasonable accommodation will be separated from United." Maybe in red text. I want the employee and potentially spouse not to miss it
- On page 2, should we also add the united logo on the upper or lower left corner? I would hate for it to be

APP.437

**Kirk Limacher**

VP, HR Services

United Airlines | Corporate Support Center

872.825.6294 – Office

312.465.3629 -- Cell

**From:** Roman, Gladys <gladys.roman@united.com>

**Sent:** Friday, August 27, 2021 4:08 PM

**To:** Limacher, Kirk <kirk.limacher@united.com>; Hodges, Michelle <Michelle.Hodges@united.com>;

Catanzano, Jessica <jessica.catanzano@united.com>

**Cc:** Millichap, Stephanie <Stephanie.Millichap@united.com>

**Subject:** FOR REVIEW: COVID-19 vaccine postcards proof

Hi team,

Attached is a mockup of the COVID-19 vaccine postcard. Please review it and send me your edits and feedback by early Monday morning so we can get this ready to ship next week.

Thank you,  
Gladys

# **EXHIBIT 83**



**From:** Muenkel, Dan </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7E9C477B2C43446BA377C4736E28AEE0-U353299>  
**To:** Catanzano, Jessica; Limacher, Kirk  
**Sent:** 10/26/2021 8:13:50 PM  
**Subject:** RE: Calls out to those who aren't testing  
**Attachments:** image001.jpg; image003.png

Thanks for getting this in place so quickly, Jessica!

**Dan Muenkel**

Managing Director – Employee Experience / People Analytics / HR PMO  
Tel 872.825.4361 | Mobile 224.201.5816

**From:** Catanzano, Jessica <jessica.catanzano@united.com>  
**Sent:** Tuesday, October 26, 2021 1:37 PM  
**To:** Limacher, Kirk <kirk.limacher@united.com>  
**Cc:** Muenkel, Dan <Dan.Muenkel@united.com>  
**Subject:** FW: Calls out to those who aren't testing

fyi

---

**Jessica Catanzano, SPHR**  
HR Project Manager

United | Willis Tower 233 S. Wacker Dr. | Chicago, IL 60606  
' (872) 825.5536 | [jessica.catanzano@united.com](mailto:jessica.catanzano@united.com) | [united.com](http://united.com)

**From:** Catanzano, Jessica  
**Sent:** Tuesday, October 26, 2021 1:36 PM  
**To:** Pape, Colleen <[Colleen.Pape@united.com](mailto:Colleen.Pape@united.com)>; Shanley, Kim <[Kim.Shanley@united.com](mailto:Kim.Shanley@united.com)>  
**Cc:** Muenkel, Dan <[Dan.Muenkel@united.com](mailto:Dan.Muenkel@united.com)>  
**Subject:** RE: Calls out to those who aren't testing

Thank you so much – let me know what comes up and we should update any of the FAQ – it's in HH (as you know) so we can update easily!

---

**Jessica Catanzano, SPHR**  
HR Project Manager

United | Willis Tower 233 S. Wacker Dr. | Chicago, IL 60606  
' (872) 825.5536 | [jessica.catanzano@united.com](mailto:jessica.catanzano@united.com) | [united.com](http://united.com)

**From:** Pape, Colleen <[Colleen.Pape@united.com](mailto:Colleen.Pape@united.com)>  
**Sent:** Tuesday, October 26, 2021 1:35 PM  
**To:** Catanzano, Jessica <[jessica.catanzano@united.com](mailto:jessica.catanzano@united.com)>; Shanley, Kim <[Kim.Shanley@united.com](mailto:Kim.Shanley@united.com)>  
**Cc:** Muenkel, Dan <[Dan.Muenkel@united.com](mailto:Dan.Muenkel@united.com)>  
**Subject:** RE: Calls out to those who aren't testing

Hi Jess,

They are going to start making call outs. We will be opening HelpHub cases and update the spreadsheet. I will

APP.440



sent it to you once we have completed the calls.

Have a good day!

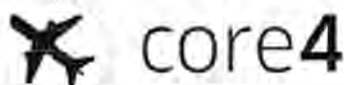
Take care,

*Colleen*

**Colleen Pape**

Manager, Employee Service Center (ESC) Operations  
(HR Operations/System Bid)

United | Corporate Support Center  
233 S. Wacker Drive WHQHR 25th Floor | Chicago, IL 60606  
Tel 847-700-4978 | [colleen.pape@united.com](mailto:colleen.pape@united.com)



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**From:** Catanzano, Jessica <[jessica.catanzano@united.com](mailto:jessica.catanzano@united.com)>  
**Sent:** Tuesday, October 26, 2021 12:49 PM  
**To:** Pape, Colleen <[Colleen.Pape@united.com](mailto:Colleen.Pape@united.com)>; Shanley, Kim <[Kim.Shanley@united.com](mailto:Kim.Shanley@united.com)>  
**Cc:** Muenkel, Dan <[Dan.Muenkel@united.com](mailto:Dan.Muenkel@united.com)>  
**Subject:** RE: Calls out to those who aren't testing

Thank you 😊

---

**Jessica Catanzano, SPHR**  
HR Project Manager

United | Willis Tower 233 S. Wacker Dr. | Chicago, IL 60606  
' (872) 825.5536 | [jessica.catanzano@united.com](mailto:jessica.catanzano@united.com) | [united.com](http://united.com)

**From:** Pape, Colleen <[Colleen.Pape@united.com](mailto:Colleen.Pape@united.com)>  
**Sent:** Tuesday, October 26, 2021 12:49 PM  
**To:** Catanzano, Jessica <[jessica.catanzano@united.com](mailto:jessica.catanzano@united.com)>; Shanley, Kim <[Kim.Shanley@united.com](mailto:Kim.Shanley@united.com)>  
**Cc:** Muenkel, Dan <[Dan.Muenkel@united.com](mailto:Dan.Muenkel@united.com)>  
**Subject:** RE: Calls out to those who aren't testing

Hi Jess, I just pulled them out of the file.

Take care,

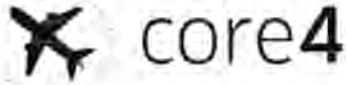
*Colleen*

**Colleen Pape**

Manager, Employee Service Center (ESC) Operations  
(HR Operations/System Bid)

United | Corporate Support Center

**APP.441**



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**From:** Catanzano, Jessica <[jessica.catanzano@united.com](mailto:jessica.catanzano@united.com)>  
**Sent:** Tuesday, October 26, 2021 12:42 PM  
**To:** Pape, Colleen <[Colleen.Pape@united.com](mailto:Colleen.Pape@united.com)>; Shanley, Kim <[Kim.Shanley@united.com](mailto:Kim.Shanley@united.com)>  
**Cc:** Muenkel, Dan <[Dan.Muenkel@united.com](mailto:Dan.Muenkel@united.com)>  
**Subject:** RE: Calls out to those who aren't testing

Can you NOT call these three – they actually haven't been notified yet. If you prefer, I can pull them out of the file and send it back.

181103	James Orwig	PL	Yes	No
233521	JD Hilton	PL	Yes	No
221642	Marc Maroney	PL	Yes	No

---

**Jessica Catanzano, SPHR**  
HR Project Manager

United | Willis Tower 233 S. Wacker Dr. | Chicago, IL 60606  
' (872) 825.5536 | [jessica.catanzano@united.com](mailto:jessica.catanzano@united.com) | [united.com](http://united.com)

**From:** Pape, Colleen <[Colleen.Pape@united.com](mailto:Colleen.Pape@united.com)>  
**Sent:** Tuesday, October 26, 2021 12:39 PM  
**To:** Catanzano, Jessica <[jessica.catanzano@united.com](mailto:jessica.catanzano@united.com)>; Shanley, Kim <[Kim.Shanley@united.com](mailto:Kim.Shanley@united.com)>  
**Cc:** Muenkel, Dan <[Dan.Muenkel@united.com](mailto:Dan.Muenkel@united.com)>  
**Subject:** RE: Calls out to those who aren't testing

Thanks Jess, I'll get the three new girls working on this shortly.

Have a good day!

Take care,

*Colleen*

**Colleen Pape**  
Manager, Employee Service Center (ESC) Operations  
(HR Operations/System Bid)

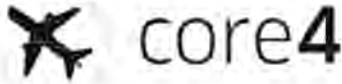
United | Corporate Support Center  
233 S. Wacker Drive WHQHR 25th Floor | Chicago, IL 60606  
Tel 847-700-4978 | [colleen.pape@united.com](mailto:colleen.pape@united.com)

**APP.442**

**CONFIDENTIAL**

**UNITED\_SAMBRANO\_00091108**





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**From:** Catanzano, Jessica <[jessica.catanzano@united.com](mailto:jessica.catanzano@united.com)>  
**Sent:** Tuesday, October 26, 2021 12:37 PM  
**To:** Shanley, Kim <[Kim.Shanley@united.com](mailto:Kim.Shanley@united.com)>; Pape, Colleen <[Colleen.Pape@united.com](mailto:Colleen.Pape@united.com)>  
**Cc:** Muenkel, Dan <[Dan.Muenkel@united.com](mailto:Dan.Muenkel@united.com)>  
**Subject:** RE: Calls out to those who aren't testing

I just realized the first bullet isn't a complete thought!

1. Let them know that they have received emails indicating that as part of their RAP accommodation they need to test 2x a week
2. Let them know that there is a discipline process associated with non-compliance (Term warning, first offense, termination for the second assuming no other discipline is in process) and we will move forward with discipline by next week if they do not comply (assuming no extenuating circumstance)
3. Ask if they have questions about the policy, provide the FAQ location info
4. See if they need any help uploading
5. Document any extenuating circumstances (they're out on FML, etc etc that we should know that would keep them from testing)

---

**Jessica Catanzano, SPHR**  
HR Project Manager

United | Willis Tower 233 S. Wacker Dr. | Chicago, IL 60606  
\* (872) 825.5536 | [jessica.catanzano@united.com](mailto:jessica.catanzano@united.com) | [united.com](http://united.com)

**From:** Catanzano, Jessica  
**Sent:** Tuesday, October 26, 2021 12:33 PM  
**To:** Shanley, Kim <[Kim.Shanley@united.com](mailto:Kim.Shanley@united.com)>; Pape, Colleen <[Colleen.Pape@united.com](mailto:Colleen.Pape@united.com)>  
**Cc:** Muenkel, Dan <[Dan.Muenkel@united.com](mailto:Dan.Muenkel@united.com)>  
**Subject:** RE: Calls out to those who aren't testing

Ok, thanks – let me know when it starts - or let Kirk know and copy me. And feel free to reach out if you have questions.

---

**Jessica Catanzano, SPHR**  
HR Project Manager

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\* (872) 825.5536 | [jessica.catanzano@united.com](mailto:jessica.catanzano@united.com) | [united.com](http://united.com)

**From:** Shanley, Kim <[Kim.Shanley@united.com](mailto:Kim.Shanley@united.com)>  
**Sent:** Tuesday, October 26, 2021 12:28 PM  
**To:** Catanzano, Jessica <[jessica.catanzano@united.com](mailto:jessica.catanzano@united.com)>; Pape, Colleen <[Colleen.Pape@united.com](mailto:Colleen.Pape@united.com)>  
**Cc:** Muenkel, Dan <[Dan.Muenkel@united.com](mailto:Dan.Muenkel@united.com)>

APP.443

Subject: RE: Calls out to those who aren't testing

Yes, that works.

**Kim Shanley, HRIP**  
Director HR Technology

United | Corporate Support Center  
233 S. Wacker Drive, 25<sup>th</sup> Floor WHQHR | Chicago, IL 60606  
Tel 872 825 4308 | Mobile 224 520 0819 | [kim.shanley@united.com](mailto:kim.shanley@united.com)  
[united.com](http://united.com)



**From:** Catanzano, Jessica <[jessica.catanzano@united.com](mailto:jessica.catanzano@united.com)>  
**Sent:** Tuesday, October 26, 2021 12:24 PM  
**To:** Shanley, Kim <[Kim.Shanley@united.com](mailto:Kim.Shanley@united.com)>; Pape, Colleen <[Colleen.Pape@united.com](mailto:Colleen.Pape@united.com)>  
**Cc:** Muenkel, Dan <[Dan.Muenkel@united.com](mailto:Dan.Muenkel@united.com)>  
**Subject:** RE: Calls out to those who aren't testing

We need them to:

1. Let them know that they have received emails indicating that as part of their RAP accommodation
2. Let them know that there is a discipline process associated with non-compliance (Term warning, first offense, termination for the second assuming no other discipline is in process) and we will move forward with discipline by next week if they do not comply (assuming no extenuating circumstance)
3. Ask if they have questions about the policy, provide the FAQ location info
4. See if they need any help uploading
5. Document any extenuating circumstances (they're out on FML, etc etc that we should know that would keep them from testing)

Does that help?

---

**Jessica Catanzano, SPHR**  
HR Project Manager

United | Willis Tower 233 S. Wacker Dr. | Chicago, IL 60606  
' (872) 825.5536 | [united.com](http://united.com)

**From:** Shanley, Kim <[Kim.Shanley@united.com](mailto:Kim.Shanley@united.com)>  
**Sent:** Tuesday, October 26, 2021 11:42 AM  
**To:** Catanzano, Jessica <[jessica.catanzano@united.com](mailto:jessica.catanzano@united.com)>; Pape, Colleen <[Colleen.Pape@united.com](mailto:Colleen.Pape@united.com)>  
**Cc:** Muenkel, Dan <[Dan.Muenkel@united.com](mailto:Dan.Muenkel@united.com)>  
**Subject:** RE: Calls out to those who aren't testing

The team won't have specifics as to why they are non-complaint other than they haven't uploaded their test results. Is that all you want them to say? Is there a deadline they should be referencing?

**Kim Shanley, HRIP**  
Director HR Technology

United | Corporate Support Center  
233 S. Wacker Drive, 25<sup>th</sup> Floor WHQHR | Chicago, IL 60606

**APP.444**





**From:** Catanzano, Jessica <[jessica.catanzano@united.com](mailto:jessica.catanzano@united.com)>  
**Sent:** Tuesday, October 26, 2021 11:30 AM  
**To:** Shanley, Kim <[Kim.Shanley@united.com](mailto:Kim.Shanley@united.com)>; Pape, Colleen <[Colleen.Pape@united.com](mailto:Colleen.Pape@united.com)>  
**Cc:** Muenkel, Dan <[Dan.Muenkel@united.com](mailto:Dan.Muenkel@united.com)>  
**Subject:** Calls out to those who aren't testing

Kim/Colleen – Kirk asked that we make calls to the individuals who are supposed to be testing and haven't complied. I'm getting a new report (yesterday it was 112 folks) of who's non-compliant. Can your team help with those outbound calls? Would you need help with a script or can you own that?

---

**Jessica Catanzano, SPHR**  
HR Project Manager

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# **EXHIBIT 84**

**From:** Walensky, Rochelle (CDC/OD) <aux7@cdc.gov>  
**To:** Kirby, Scott  
**CC:** Fariello, Theresa  
**Sent:** 8/6/2021 8:08:10 AM  
**Subject:** [EXTERNAL] RE: Vaccine announcement tomorrow

This message was sent from outside of United Airlines. Please do not click links or open attachments unless you recognize the sender and know that the content is safe.

Dear Scott,

Thank you so much for this email and for leaning in this critical issue at this moment. I'm grateful both your push and pull ways of handling this and for being in touch with your plans.

My very best,  
Rochelle

**From:** Kirby, Scott <Scott.Kirby@united.com>  
**Sent:** Thursday, August 5, 2021 7:23 PM  
**To:** Walensky, Rochelle (CDC/OD) <aux7@cdc.gov>  
**Cc:** Fariello, Theresa <Theresa.Fariello@united.com>  
**Subject:** Vaccine announcement tomorrow

Dr. Walensky,

Sending a quick note to give you a personal heads up that tomorrow morning we will be informing United employees that we will be requiring our employees to be vaccinated by this fall. It's so clear that vaccines are the most effective way to protect against COVID-19, therefore we believe we have a responsibility to take this action. All U.S.-based United employees will be required to upload a vaccine card to our company intranet by 5 weeks after the FDA has announced it has fully approved a vaccine, or 5 weeks after September 20, whichever comes first. Employees that complete this step before September 20 will receive an additional day of pay.

We know that not everyone will agree with this, but we are acting because it's the right thing to do. Thanks for all you're doing to battle the pandemic. Feel free to reach out with any questions.

Scott

Sent from my iPad



# **EXHIBIT 85**

**From:** [REDACTED] </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=DAE9AE3C34FC4136A3B7AFE123C11B2B-U126964>  
**To:** Kate Gebo  
**Sent:** 9/17/2021 12:30:33 PM  
**Subject:** Fw: HRC3645668 has been updated with new comments

---

**From:** [REDACTED]  
**Sent:** Friday, September 17, 2021 10:53 AM  
**To:** [REDACTED]@united.com>  
**Subject:** [EXTERNAL] Fwd: Fw: HRC3645668 has been updated with new comments

This message was sent from outside of United Airlines. Please do not click links or open attachments unless you recognize the sender and know that the content is safe.

----- Forwarded message -----

**From:** [REDACTED]@united.com>  
**Date:** Wed, Sep 15, 2021 at 12:06 PM  
**Subject:** Fw: HRC3645668 has been updated with new comments  
**To:** [REDACTED]

---

**From:** [REDACTED]@united.com>  
**Sent:** Wednesday, September 15, 2021 12:06 PM  
**To:** Help Hub <united@service-now.com>  
**Subject:** Re: HRC3645668 has been updated with new comments

To whom it may concern,

Shame on you United. I've been patiently waiting for a response from United for nearly a month on my RAP. Ten days in I am asked for follow up questions that I answer. I wait again. Try to get answers through HR locally and from Kimberly Daniels. No response whatsoever, not even a courtesy reply to my email, as vaccine deadlines pass. Shame on you United. Then it is announced that if you are granted a RAP you will now be held out of service without pay. Shame on you United. The stress this "game of chicken" United is playing has taken quite a toll on myself and my family. Shame on you United. Then nearly a month into waiting for a response, I get another request for more info needed for my RAP on the most sacred day of our airlines history, September 11. No less than the 20th anniversary of this tragedy. Shame on you United. As being off the weekend I did not check my company mail until returning to work on Monday, where I read yet another request this time having only 3 days to respond which Monday is the third day leaving no time to comply. It has become quite obvious to me that United never had any intention of approving my RAP. Shame on you United. This coupled with the blatant disregard of my info I provided the company for the effectiveness of natural

APP.449

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immunity which I acquired early in 2020. It has kept me quite safe through the worst of the pandemic at my workplace despite being in close contact with many coworkers that developed COVID. Even my own doctor said she did not believe in mandates and I was certainly better with the natural immunity I acquired through COVID, and my bloodwork still showed it effective 18 months later. But absolute silence from my company that I have given my heart to for over 30 years. Shame on you United. After an emotional roller coaster and near panic from my wife and I that I was about to lose my job and family livelihood of over 30 years. I have succumb to the pressures of my company and have taken the COVID vaccine despite my objections. My family and ability to support them will always come first and I pray for my good health.

From: Help Hub <united@service-now.com>  
 Sent: Saturday, September 11, 2021 1:13 PM  
 To: [REDACTED]<[REDACTED]@united.com>  
 Subject: HRC3645668 has been updated with new comments

Hi [REDACTED]  
 We've got an update on your request.  
 If you have any questions, please click the link below to access your request or reply to this email.  
**Request Number:** HRC3645668  
**Short Description:** Reasonable Accommodation Request - [REDACTED]

2021-09-11 14:13:07 CDT - Kirk Limacher

Additional comments

Good Afternoon and thanks for your patience,

Please provide within the next 3 days written documentation from a third person, whom you personally know, who is aware of your sincerely held religious belief and can support your request for a religious accommodation.

Thanks,  
 ESC Absence Management

2021-08-30 12:11:53 CDT - [REDACTED]

Additional comments

a.) Yes, as a child my parents had me vaccinated against certain diseases. Not sure which vaccines may have been administered, but sure they had been around for years with a thorough testing and proven track record. But now as an adult I take full responsibility for what I take and put into my body.  
 b.) Yes, aspirin taken very sparingly when sore or headaches. Much different than the COVID vaccine as aspirin has been around and used for over 100 years where as the COVID vaccine was rushed to existence with a short history of trials and tests. Other types of medicine such as aspirin were not researched and tested with fetal cell lines as the current COVID vaccines had. Who knows what the effects of the DNA within those cells will be down the road or what diseases could manifest?  
 Additional question a.) No

2021-08-29 16:38:30 CDT - Kimberly Daniels

Additional comments

In order to process your religious accommodation request please provide additional information regarding the following within three days:

a.) Have you received vaccinations in the past? Yes \_\_\_ No \_\_\_

If you answered yes:

- When did you receive these vaccines?

- What vaccines did you take?

b.) Do you currently take or have you ever taken medications of any kind (over the counter or prescription)?

APP.450



Note: We are not asking you tell us what medications you take or why you take them. Yes \_\_\_ No \_\_\_

If you answered yes:

- When is the last time you took such medicine?
- How is the COVID vaccine different from these medicines if at all?
- What about your religious belief prevents you from getting the COVID vaccines, but not taking other types of medicine?

Additionally, please provide additional information regarding the following within three days:

- a.) Are you aware if any vaccines or medications you have previously received were created, researched, tested or otherwise involved the use of stem cells? Yes \_\_\_ No \_\_\_ Don't know \_\_\_
- b.) If your answer is yes, please explain why receiving such vaccines or medications were not a violation of your sincerely held religious belief.
- c.) If your answer is don't know, please explain why receiving these vaccines without knowing these conditions was not or is not a violation of your sincerely held religious beliefs.

Thank you,

Absence Management

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Notification: Add'l Comments Added - Workforce Admin

Ref:MSG40505121

APP.451

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# **EXHIBIT 86**

**Short Message Report**

Conversations: 1	Participants: 107
Total Messages: 60	Date Range: 11/1/2021

**Outline of Conversations**

 Microsoft Teams chat between [Demma, Jill, Francis, Jennifer, Woods, Sierra, Nobles, Keisha, Kelly, Adrienne, Szymkowski, Virginia, Ng, Betty, Thigpen, Sheri, Harris, Deette, Baker, Tia, Maldonado, Kat, Cleveland, Roz, Khan, Hasan, Williams, Krystal, Jaleel, Aiman, Kemp, Jennifer, Mallari, Louie, Daniels, Kimberly, Glass, Stacy, Rivera Torres, Carlos, Roque, Roman, Crawford, Clarence, Diaz-Ventura, Paul, Mahecha, Karen, Siki, Dorothy, Cano- Medrano, Carina, Curtis, Lee, Pitchford, Marshawn, Lee, Tom, Sykes, Melvin, Gutierrez, Jackie, Alejandria, Armando, Baker, Tia, Barton-Smith, Brittany, Cano- Medrano, Carina, Clark, Syreeta, Cleveland, Roz, Crawford, Clarence, Curtis, Lee, Daniels, Kimberly, Darden, Jacqueline, Demma, Jill, Diaz-Ventura, Paul, Dodd, Alillah, Dubal, John Rex, ESC - Shift\_Coord, Fox, Maeve, Francis, Jennifer, Garcia, Hanna, Garland, Antoinette, Gaston, Latoya, Gill, Rachyl, Glass, Stacy, Guiab, Kathy, Gutierrez, Jackie, Guy, Gina, Jaleel, Aiman, Kapuscik, Marilyn, Kelly, Adrienne, Kemp, Jennifer, Khan, Hasan, Lee, Tom, Love, Jasmine, Mahecha, Karen, Maldonado, Kat, Mallari, Louie, Myers, Alesa, Ng, Betty, Nobles, Keisha, Pitchford, Marshawn, Posada Duran, Mario, Preston, Kim, Rivera Torres, Carlos, Robb, Neil, Roque, Roman, Rynders, Lauren, Siki, Dorothy, Subhan, Zareena, Sykes, Melvin, Szymkowski, Virginia, Thigpen, Sheri, Williams, Krystal, Woods, Sierra, Garland, Antoinette, Rynders, Lauren, Kapuscik, Marilyn, Gaston, Latoya, Darden, Jacqueline, Guiab, Kathy, Clark, Syreeta, Gill, Rachyl, Garcia, Hanna, Myers, Alesa, Dubal, John Rex, Barton-Smith, Brittany, Subhan, Zareena, Alejandria, Armando, ESC - Shift\_Coord, Dodd, Alillah, Love, Jasmine, Guy, Gina, Posada Duran, Mario, Fox, Maeve, Adamczyk, Monika, Ramos, Alicia, Robb, Neil, Preston, Kim] • 60 messages on 11/1/2021 • Adamczyk, Monika • Alejandria, Armando • Alejandria, Armando • Baker, Tia • Baker, Tia • Barton-Smith, Brittany • Barton-Smith, Brittany • Cano- Medrano, Carina • Cano- Medrano, Carina • Clark, Syreeta • Clark, Syreeta • Cleveland, Roz • Cleveland, Roz • Crawford, Clarence • Crawford, Clarence • Curtis, Lee • Curtis, Lee • Daniels, Kimberly • Daniels, Kimberly • Darden, Jacqueline • Darden, Jacqueline • Demma, Jill • Demma, Jill • Diaz-Ventura, Paul • Diaz-Ventura, Paul • Dodd, Alillah • Dodd, Alillah • Dubal, John Rex • Dubal, John Rex • ESC - Shift\_Coord • ESC - Shift\_Coord • Fox, Maeve • Fox, Maeve • Francis, Jennifer • Francis, Jennifer • Garcia, Hanna • Garcia, Hanna • Garland, Antoinette • Garland, Antoinette • Gaston, Latoya • Gaston, Latoya • Gill, Rachyl • Gill, Rachyl • Glass, Stacy • Glass, Stacy • Guiab, Kathy • Guiab, Kathy • Gutierrez, Jackie • Gutierrez, Jackie • Guy, Gina • Guy, Gina • Harris, Deette • Jaleel, Aiman • Jaleel, Aiman • Kapuscik, Marilyn • Kapuscik, Marilyn • Kelly, Adrienne • Kelly, Adrienne • Kemp, Jennifer • Kemp, Jennifer • Khan, Hasan • Khan, Hasan • Lee, Tom • Lee, Tom • Love, Jasmine • Love, Jasmine • Mahecha, Karen • Mahecha, Karen • Maldonado, Kat • Maldonado, Kat • Mallari, Louie • Mallari, Louie • Myers, Alesa • Myers, Alesa • Ng, Betty • Ng, Betty • Nobles, Keisha • Nobles, Keisha • Pitchford, Marshawn • Pitchford, Marshawn • Posada Duran, Mario • Posada Duran, Mario • Preston, Kim • Preston, Kim • Ramos, Alicia • Rivera Torres, Carlos • Rivera Torres, Carlos • Robb, Neil • Robb, Neil • Roque, Roman • Roque, Roman • Rynders, Lauren • Rynders, Lauren • Siki, Dorothy • Siki, Dorothy • Subhan, Zareena • Subhan, Zareena • Sykes, Melvin • Sykes, Melvin • Szymkowski, Virginia • Szymkowski, Virginia • Thigpen, Sheri • Thigpen, Sheri • Williams, Krystal • Williams, Krystal • Woods, Sierra • Woods, Sierra



Messages in chronological order (times are shown in GMT -05:00)

Microsoft Teams chat between [Demma, Jill, Francis, Jennifer, Woods, Sierra, Nobles, Keisha, Kelly, Adrienne, Szymkowski, Virginia, Ng, Betty, Thigpen, Sheri, Harris, Deette, Baker, Tia, Maldonado, Kat, Cleveland, Roz, Khan, Hasan, Williams, Krystal, Jaleel, Aiman, Kemp, Jennifer, Mallari, Louie, Daniels, Kimberly, Glass, Stacy, Rivera Torres, Carlos, Roque, Roman, Crawford, Clarence, Diaz-Ventura, Paul, Mahecha, Karen, Siki, Dorothy, Cano- Medrano, Carina, Curtis, Lee, Pitchford, Marshawn, Lee, Tom, Sykes, Melvin, Gutierrez, Jackie, Alejandria, Armando, Baker, Tia, Barton-Smith, Brittany, Cano- Medrano, Carina, Clark, Syreeta, Cleveland, Roz, Crawford, Clarence, Curtis, Lee, Daniels, Kimberly, Darden, Jacqueline, Demma, Jill, Diaz-Ventura, Paul, Dodd, Alillah, Dubal, John Rex, ESC - Shift\_Coord, Fox, Maeve, Francis, Jennifer, Garcia, Hanna, Garland, Antoinette, Gaston, Latoya, Gill, Rachyl, Glass, Stacy, Guiab, Kathy, Gutierrez, Jackie, Guy, Gina, Jaleel, Aiman, Kapuscik, Marilyn, Kelly, Adrienne, Kemp, Jennifer, Khan, Hasan, Lee, Tom, Love, Jasmine, Mahecha, Karen, Maldonado, Kat, Mallari, Louie, Myers, Alesa, Ng, Betty, Nobles, Keisha, Pitchford, Marshawn, Posada Duran, Mario, Preston, Kim, Rivera Torres, Carlos, Robb, Neil, Roque, Roman, Rynders, Lauren, Siki, Dorothy, Subhan, Zareena, Sykes, Melvin, Szymkowski, Virginia, Thigpen, Sheri, Williams, Krystal, Woods, Sierra, Garland, Antoinette, Rynders, Lauren, Kapuscik, Marilyn, Gaston, Latoya, Darden, Jacqueline, Guiab, Kathy, Clark, Syreeta, Gill, Rachyl, Garcia, Hanna, Myers, Alesa, Dubal, John Rex, Barton-Smith, Brittany, Subhan, Zareena, Alejandria, Armando, ESC - Shift\_Coord, Dodd, Alillah, Love, Jasmine, Guy, Gina, Posada Duran, Mario, Fox, Maeve, Adamczyk, Monika, Ramos, Alicia, Robb, Neil, Preston, Kim]

HG Garcia, Hanna 11/1/2021, 8:17 AM  
GM! If [REDACTED] ends up calling back

HG Garcia, Hanna 11/1/2021, 8:17 AM  
please transfer to me - I tried calling her again but went to VM

AG Garland, Antoinette 11/1/2021, 9:47 AM  
Hi - I have an FA on the line checking the status of RTW i advise she wasn't cleared due to vaccine status she stated she have a RAP but her rap was close due to not submitting documentation she just upload the doc to the closed case

AG Garland, Antoinette 11/1/2021, 9:48 AM  
HRC3700074

AG Garland, Antoinette 11/1/2021, 9:48 AM  
[REDACTED]

AG Garland, Antoinette 11/1/2021, 9:48 AM  
U304440

AG Garland, Antoinette 11/1/2021, 9:49 AM  
Would it be review

LC Curtis, Lee 11/1/2021, 9:50 AM  
let me look

LC Curtis, Lee 11/1/2021, 9:54 AM  
Her case has been closed out so we will not be reviewing it.

AG Garland, Antoinette 11/1/2021, 9:55 AM  
i told her she was receive an email response regarding her RAP

JF Francis, Jennifer 11/1/2021, 12:54 PM  
How are we handling FAs upcoming trips who have a RAP exemption that is still pending? She stated that she is being held accountable. Thank you.

APP.454

NR	Robb, Neil I would suspect they will be unable to fly pending the outcome of the RAP. Who is the employee? I can check status of their request	11/1/2021, 12:59 PM
JF	Francis, Jennifer U186293...	11/1/2021, 12:59 PM
NR	Robb, Neil [REDACTED]?	11/1/2021, 1:00 PM
NR	Robb, Neil Oops. Never mind. No RAP request comes up for that ee number	11/1/2021, 1:01 PM
JF	Francis, Jennifer 1 sec	11/1/2021, 1:01 PM
JF	Francis, Jennifer 186923	11/1/2021, 1:02 PM
JF	Francis, Jennifer [REDACTED]	11/1/2021, 1:03 PM
CC	Crawford, Clarence Not her	11/1/2021, 1:03 PM
CC	Crawford, Clarence AGAIN!!	11/1/2021, 1:03 PM
NR	Robb, Neil She has two RAP requests. Neither are pending.	11/1/2021, 1:03 PM
NR	Robb, Neil She acknowledged her medical RAP on 10/13	11/1/2021, 1:04 PM
JF	Francis, Jennifer HRC3982277	11/1/2021, 1:05 PM
JF	Francis, Jennifer That one	11/1/2021, 1:05 PM
NR	Robb, Neil A third one??	11/1/2021, 1:05 PM
JF	Francis, Jennifer This one is supended	11/1/2021, 1:06 PM
CC	Crawford, Clarence that sounds about right.	11/1/2021, 1:06 PM
JF	Francis, Jennifer Mask request	11/1/2021, 1:06 PM
NR	Robb, Neil This thrid request is for a mask	11/1/2021, 1:06 PM
JF	Francis, Jennifer Geez!	11/1/2021, 1:06 PM

APP.455

NR Robb, Neil 11/1/2021, 1:07 PM  
 [REDACTED]  
 is working it, but she still needs to wear a mask until this RAP case is decided

JF Francis, Jennifer 11/1/2021, 1:09 PM  
 I guess her supervisor told her she is responsible for her trips. I also guess that is what she was trying to get out of.

NR Robb, Neil 11/1/2021, 1:10 PM  
 As she has an approved RAP and the outcome of the RAP is pending litigation, she can work until that time (11/8) and would need to wear a KN95 mask

JF Francis, Jennifer 11/1/2021, 1:10 PM  
 Thank you!!

HG Garcia, Hanna 11/1/2021, 1:42 PM  
 Good morning, can someone look into this case?

LC Curtis, Lee 11/1/2021, 1:43 PM  
 Which case?

HG Garcia, Hanna 11/1/2021, 1:43 PM  
 003759 - HRC3695076

HG Garcia, Hanna 11/1/2021, 1:44 PM  
 sorry I got distracted - there's 2 requests in one case

HG Garcia, Hanna 11/1/2021, 1:44 PM  
 is she approved for the medical one?

LC Curtis, Lee 11/1/2021, 1:45 PM  
 Jill Demma would you take a quick look at this one.

HG Garcia, Hanna 11/1/2021, 1:45 PM  
 she also stated she was under the impression that she requested the 90 days only, is her approval temporary?

LC Curtis, Lee 11/1/2021, 1:46 PM  
 I see that it was approved for medical, but not details in the case if it is temporary or not.

LC Curtis, Lee 11/1/2021, 1:46 PM  
 I am still reviewing.

HG Garcia, Hanna 11/1/2021, 1:47 PM  
 Thanks, I will call her back once I have info

LC Curtis, Lee 11/1/2021, 1:48 PM  
 Based on chart notes, there is currently no duration limitation to her approved medical RAP

LC Curtis, Lee 11/1/2021, 1:48 PM  
 Jill, you do not need to look at this one.

HG Garcia, Hanna 11/1/2021, 1:51 PM  
 LOL she was confused with her question herself... It's ok Jill, I just confirmed that it is medical approval

HG Garcia, Hanna 11/1/2021, 1:52 PM  
 her question was about something else. Thanks for confirming Lee

APP.456



TB Baker, Tia 11/1/2021, 3:14 PM  
Hello managers, u159517 [REDACTED] has been approved for a religious RAP and now wants to submit documents for a medical RAP. I told him to upload the docs into his religious RAP case. HRC3624765. Thanks -

RC Cleveland, Roz 11/1/2021, 6:52 PM  
u130675 [REDACTED] would like his original RAP reopened.

RC Cleveland, Roz 11/1/2021, 6:52 PM  
"I would respectfully request that my original RAP be reinstated. I withdrew my original RAP decision under coercion and duress.  
Thank you [REDACTED]"

NR Robb, Neil 11/1/2021, 6:53 PM  
Short answer. Can't do it

RC Cleveland, Roz 11/1/2021, 6:56 PM  
For EE's with upcoming leave for RAP's - have the emails been sent yet?

NR Robb, Neil 11/1/2021, 7:02 PM  
For November 8?

RC Cleveland, Roz 11/1/2021, 7:03 PM  
yes - she is surprised she has a NOV sked

NR Robb, Neil 11/1/2021, 7:04 PM  
If she has no RAP. She should not have a schedule. Best to ask their scheduling supervisor

RC Cleveland, Roz 11/1/2021, 7:04 PM  
She has a Religious rap approved

NR Robb, Neil 11/1/2021, 7:05 PM  
Then should go on leave Nov 9

RC Cleveland, Roz 11/1/2021, 7:05 PM  
but they do get an email right?

NR Robb, Neil 11/1/2021, 7:06 PM  
Should yes.

# **EXHIBIT 87**

## Short Message Report

Conversations: 1	Participants: 3
Total Messages: 126	Date Range: 8/26/2021


### Outline of Conversations



**Microsoft Teams chat between [Banks, Sonya, Lehmann, Lauren, Adamczyk, Monika]** • 126 messages on 8/26/2021 • Adamczyk, Monika • Banks, Sonya • Lehmann, Lauren



Messages in chronological order (times are shown in GMT -05:00)

 **Microsoft Teams chat between [Banks, Sonya, Lehmann, Lauren, Adamczyk, Monika]**

MA Adamczyk, Monika 8/26/2021, 8:30 AM  
why do i always have trouble with vpn

LL Lehmann, Lauren 8/26/2021, 8:30 AM  
uh oh!

MA Adamczyk, Monika 8/26/2021, 8:30 AM  
always this week

MA Adamczyk, Monika 8/26/2021, 8:31 AM  
re-starting

MA Adamczyk, Monika 8/26/2021, 8:31 AM  
...

MA Adamczyk, Monika 8/26/2021, 8:37 AM  
yay worked

LL Lehmann, Lauren 8/26/2021, 8:37 AM  
yay!

LL Lehmann, Lauren 8/26/2021, 8:45 AM  
i knew it was going to happen....

LL Lehmann, Lauren 8/26/2021, 8:45 AM  
What is your inquiry?: Why is the deadline Sept 20th for second shot for the paid day?  
If I get my first dose of Moderna vaccine today the 25th of Aug my second dose is after Sept 20 but before the 27Th  
Am I still eligible for the paid day?

LL Lehmann, Lauren 8/26/2021, 9:00 AM  
make it make sense....this guy just called. he JUST got hired. and he's requesting a RAP for the vaccine!

MA Adamczyk, Monika 8/26/2021, 9:42 AM  
Requested For (on behalf): Shearon Hollaway  
What is your question?: GM, I'm going to submit a medical exemption letter but my doctor was out of the country so my appointment is on September 1, 2021. I didn't realize the deadline for exemption request is on August 30. I thought I had until September 27, 2021. My question is, will I still be able to submit my letter on September 1?

MA Adamczyk, Monika 8/26/2021, 9:43 AM  
answers no right...

MA Adamczyk, Monika 8/26/2021, 9:43 AM  
no exceptions?

LL Lehmann, Lauren 8/26/2021, 9:44 AM  
correct, no execptions. has to be entered in the system by 8/30

SB Banks, Sonya 8/26/2021, 10:10 AM  
I think as long as they start the process by 08/31..but you may want to clarify that.

SB Banks, Sonya 8/26/2021, 10:10 AM  
I think she could submit her letter on 09/1 but she has to have a case opened by 08/31

**APP.460**

SB	Banks, Sonya But again...I could be wrong	8/26/2021, 10:10 AM
MA	Adamczyk, Monika would i just assign it to absence?	8/26/2021, 10:10 AM
MA	Adamczyk, Monika bc idk	8/26/2021, 10:11 AM
SB	Banks, Sonya I would check with Jessica....the Q&A says Submitted By	8/26/2021, 10:11 AM
SB	Banks, Sonya I take that to mean a case opened by 08/31	8/26/2021, 10:11 AM
LL	Lehmann, Lauren wait, really?!?!	8/26/2021, 10:11 AM
SB	Banks, Sonya Like I said "I" could be wrong	8/26/2021, 10:12 AM
LL	Lehmann, Lauren this is all confusing	8/26/2021, 10:15 AM
LL	Lehmann, Lauren lol!	8/26/2021, 10:15 AM
SB	Banks, Sonya So what do we do with these?	8/26/2021, 10:35 AM
SB	Banks, Sonya <u>What is your inquiry?: Request for covid 19 vaccine extension</u>	8/26/2021, 10:35 AM
MA	Adamczyk, Monika <u>lol say nahhhh bro</u>	8/26/2021, 10:35 AM
MA	Adamczyk, Monika <u>and close it</u>	8/26/2021, 10:35 AM
MA	Adamczyk, Monika jkjk	8/26/2021, 10:35 AM
SB	Banks, Sonya <u>LMBO</u>	8/26/2021, 10:35 AM
MA	Adamczyk, Monika <u>they need a rap...</u>	8/26/2021, 10:35 AM
SB	Banks, Sonya that was the response in my head	8/26/2021, 10:35 AM
MA	Adamczyk, Monika if they need an extension	8/26/2021, 10:35 AM
SB	Banks, Sonya	8/26/2021, 10:35 AM

APP.461

lol

MA Adamczyk, Monika 8/26/2021, 10:41 AM  
who do these go to?

MA Adamczyk, Monika 8/26/2021, 10:41 AM  
I would like to know if I have a chance after retiring last year's 2020 with the VSP2 program, to return as a new employee or how I could be part of United Airline once again. My employee number is U241598 and I retired with 23 years and 10 months of service with Continental/ United airline. I would like to be part of the United Airline family again, but also my options since I have in my possession the debit card granted with \$35 thousand dollars and other benefits. I am not aware of the impact my benefits may have once I am given the opportunity to return to work.

MA Adamczyk, Monika 8/26/2021, 10:42 AM  
or do i just say they need to re-apply and would lose vsl benefits if they return?

MA Adamczyk, Monika 8/26/2021, 10:42 AM  
vsp\*\*

MA Adamczyk, Monika 8/26/2021, 10:42 AM  
also,

MA Adamczyk, Monika 8/26/2021, 10:42 AM  
AMSImage sent




Image: 0-cus-d19-5a83884cb390535b4c55bb9b2349de63.png (57 KB)

MA Adamczyk, Monika 8/26/2021, 10:42 AM  
sonya is right

LL Lehmann, Lauren 8/26/2021, 10:54 AM  
they have to wait 12mths before returning to United since they retired, although some people have been able to come back before that

MA Adamczyk, Monika 8/26/2021, 10:59 AM  
isnt the covid team the medical escalation line?

MA Adamczyk, Monika 8/26/2021, 11:01 AM  
like who is our covid team...

MA Adamczyk, Monika 8/26/2021, 11:01 AM  
idk the process anymore

LL Lehmann, Lauren 8/26/2021, 11:04 AM  
File sent: Hot Rod Illustration GIF by Dayglow (GIF Image)

APP.462



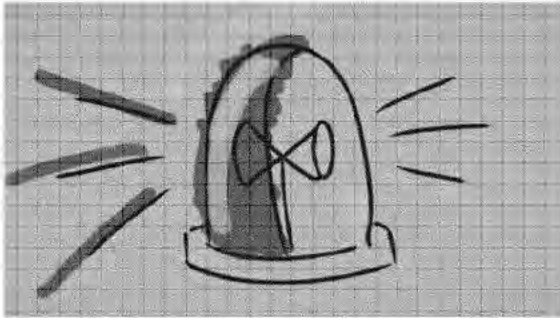


Image: Hot Rod Illustration GIF by Dayglow (GIF Image).gif (102 KB)

LL      Lehmann, Lauren      8/26/2021, 11:05 AM  
According to 2 employees I just transferred to RAP, Tom Reardon and Zachary Jones sent them out communication that they can now submit for both a medical AND religious exemption!!

MA      Adamczyk, Monika      8/26/2021, 11:10 AM  
im confused

MA      Adamczyk, Monika      8/26/2021, 11:10 AM  
on multiple things

SB      Banks, Sonya      8/26/2021, 11:15 AM  
they can only open one RAP case though

SB      Banks, Sonya      8/26/2021, 11:15 AM  
so they will both appear under 1 case

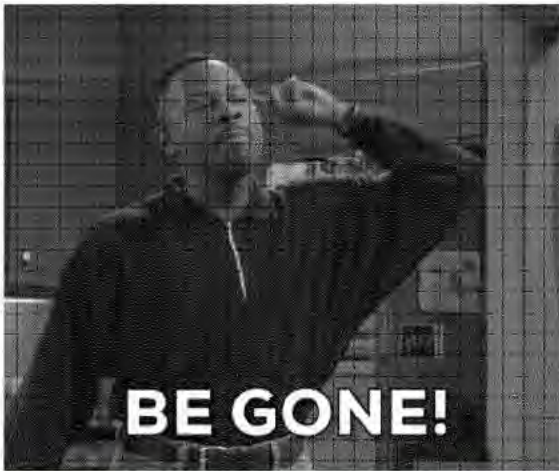
LL      Lehmann, Lauren      8/26/2021, 11:15 AM  
but why are we even allowing both?!?! then it was stupid to tell people that the vaccine was mandatory! ugh!

SB      Banks, Sonya      8/26/2021, 11:16 AM  
I have talked to QUITE a few people that have submitted both

LL      Lehmann, Lauren      8/26/2021, 11:17 AM  
same. it's BS.

SB      Banks, Sonya      8/26/2021, 11:18 AM  
I have answered about 6 cases saying how and where do I submit a RAP request

SB      Banks, Sonya      8/26/2021, 11:18 AM  
at this point.....  
File sent: Go Away Leave GIF by Martin (GIF Image)



*Image: Go Away Leave GIF by Martin (GIF Image).gif (1 MB)*

LL	Lehmann, Lauren	8/26/2021, 11:18 AM
	<u>lol!!! absolutely!</u>	
LL	Lehmann, Lauren	8/26/2021, 11:19 AM
	<u>i want to know where ppl are getting these sham Drs to write them off for these alleged illness</u>	
SB	Banks, Sonya	8/26/2021, 11:19 AM
	<u>I typed something that would probably get me in trouble so I erased it</u>	
SB	Banks, Sonya	8/26/2021, 11:19 AM
	lol	
LL	Lehmann, Lauren	8/26/2021, 11:19 AM
	<u>LMAO!!!!!!!!!!</u>	
LL	Lehmann, Lauren	8/26/2021, 11:30 AM
	so, the phones should be off now for us for lunch, right?	
MA	Adamczyk, Monika	8/26/2021, 12:31 PM
	i thought mary was o	
MA	Adamczyk, Monika	8/26/2021, 12:31 PM
	on	
MA	Adamczyk, Monika	8/26/2021, 12:43 PM
	who does this go to?	
MA	Adamczyk, Monika	8/26/2021, 12:43 PM
	Requested For (on behalf): Jerrod Baxter What is your question?. I had another question about the denver transfer. When you say acceptable residence would that include a month by month extended stay. Would an extended stay qualify as acceptable residence in Denver. I was going to pay month by month for an extended stay room until I found a 3bedroom in Denver.	
MA	Adamczyk, Monika	8/26/2021, 12:43 PM
	like seriously we have nothing on this denver stuff except the email they sent out.,	
LL	Lehmann, Lauren	8/26/2021, 12:43 PM
	ask Colleen because I'm not sure who would answer those	

MA Adamczyk, Monika 8/26/2021, 12:44 PM  
ugh she is not answering my questions in teams

LL Lehmann, Lauren 8/26/2021, 12:44 PM  
maybe she stepped away...hopefully not for long.

MA Adamczyk, Monika 8/26/2021, 12:45 PM  
no i mezan from yesterday

MA Adamczyk, Monika 8/26/2021, 12:45 PM  
i just know shes busy but idk who else to ask

LL Lehmann, Lauren 8/26/2021, 12:49 PM  
check with Chasmyn and see if she knows who at DEN that could answer that

LL Lehmann, Lauren 8/26/2021, 1:02 PM  
FYI for those who are going to call and say "can you please add me? I missed it by 1 day!"

LL Lehmann, Lauren 8/26/2021, 1:02 PM  
AMSImage sent

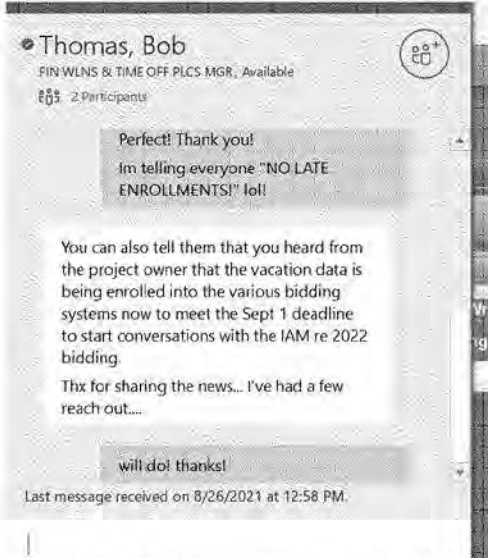


Image: 0-eus-d14-8bfecceae409cd4ef3c65e8271f1bcc9.png (57 KB)

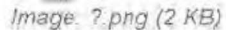
LL Lehmann, Lauren 8/26/2021, 1:02 PM  
[8/26/2021 12:57 PM] Thomas, Bob:

It was open for 3.5 weeks. It opened on July 30 and closed on Aug 25. A reminder was sent on Aug 24.

SB Banks, Sonya 8/26/2021, 2:41 PM  
Can I get some call assistance please



File sent: 



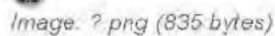
8/26/2021, 2:41 PM

8/26/2021, 2:42 PM

8/26/2021, 2:43 PM

8/26/2021, 3:00 PM

8/26/2021, 3:01 PM



8/26/2021, 3:01 PM

8/26/2021, 4:05 PM

8/26/2021, 4:05 PM

8/26/2021, 4:05 PM

8/26/2021, 4:06 PM

8/26/2021, 4:06 PM

8/26/2021, 4:06 PM

8/26/2021, 4:06 PM

8/26/2021, 4:06 PM



APP.466

Image: 0-cus-d6-f0dcd10c859262200249e44061e1ebef.png (80 KB)

MA Adamczyk, Monika 8/26/2021, 4:06 PM  
see it shows fully vaccinated but when i click on either attachment, this is what it shows

MA Adamczyk, Monika 8/26/2021, 4:07 PM  
AMSIimage sent

**COVID-19 Vaccination Record Card**  
Please keep this record card, which includes medical information about the vaccines you have received.

**Last Name** [REDACTED] **First Name** [REDACTED] **MI** [REDACTED]  
**Date of Birth** [REDACTED]

Vaccine	Product Name/Manufacturer Lot Number	Date	Healthcare Professional or Clinic Site
1 <sup>st</sup> Dose COVID-19		mm dd yy	
2 <sup>nd</sup> Dose COVID-19	MODERNA COVID-19 VACC VIAL 021C21A	06/06/2021	Publix Pharmacy #1596
Other		mm dd yy	
Other		mm dd yy	

Image: 0-cus-d14-3d56f90f1eec03e7cad6a0072646f163.png (1 MB)

MA Adamczyk, Monika 8/26/2021, 4:07 PM  
theres nothing in the line of 1st dose...

LL Lehmann, Lauren 8/26/2021, 4:07 PM  
that's so weird. I wonder if he has 2 cards

LL Lehmann, Lauren 8/26/2021, 4:07 PM  
which is still

MA Adamczyk, Monika 8/26/2021, 4:21 PM  
so what now

MA Adamczyk, Monika 8/26/2021, 4:21 PM  
he said: What is your inquiry?: I do not have a vaccine stamp or dose number for my first shot. My covid vac card is only stamped for my second shot. I upload a photo of my card. Do I need to submit additional info?

LL Lehmann, Lauren 8/26/2021, 4:24 PM  
umm, sir! you have to go back to your drs office/clinic/pharmacy and have them give you a card or label for the 1st dose.

MA Adamczyk, Monika 8/26/2021, 4:50 PM  
right! like u need to show proof

MA Adamczyk, Monika 8/26/2021, 4:51 PM  
im so ready to go to the marvel exhibit

LL Lehmann, Lauren 8/26/2021, 4:51 PM  
you got tickets??

LL Lehmann, Lauren 8/26/2021, 4:51 PM  
how cool!

MA Adamczyk, Monika 8/26/2021, 4:51 PM  
File sent: iron man GIF (GIF Image)

APP.467



Image: iron man GIF (GIF Image).gif (943 KB)

MA Adamczyk, Monika 8/26/2021, 4:51 PM  
my favorite man ^

MA Adamczyk, Monika 8/26/2021, 4:52 PM  
ill show you guys pics if you havent gone!

LL Lehmann, Lauren 8/26/2021, 4:52 PM  
OMG! Bryson would scream! lol! I wanted to take him but could never get tickets File sent: 🤔

Image: ?.png (596 bytes)

MA Adamczyk, Monika 8/26/2021, 4:52 PM  
theyre open til october i think!

MA Adamczyk, Monika 8/26/2021, 4:52 PM  
you still have time

LL Lehmann, Lauren 8/26/2021, 4:52 PM  
ok, good!

LL Lehmann, Lauren 8/26/2021, 4:52 PM  
im going to look at another day

MA Adamczyk, Monika 8/26/2021, 4:52 PM  
im going to scream too...

MA Adamczyk, Monika 8/26/2021, 4:53 PM  
lol just like a child

LL Lehmann, Lauren 8/26/2021, 4:53 PM  
LOL!!!!!!!!!!!!!! you and Bryson together would be a riot!

MA Adamczyk, Monika 8/26/2021, 4:53 PM  
File sent: woo hoo ric flair GIF (GIF Image)



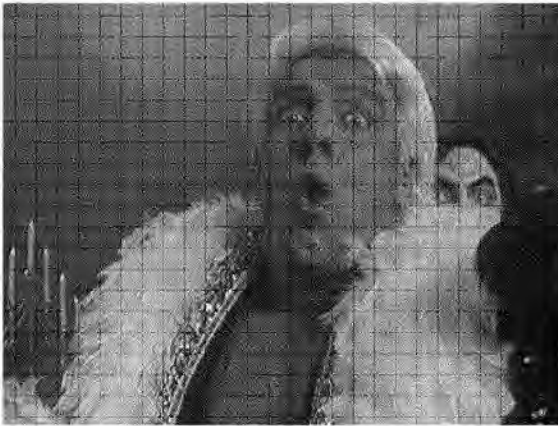


Image: woo hoo ric flair GIF (GIF Image) gif (885 KB)

LL	Lehmann, Lauren LOL!!!!!!	8/26/2021, 4:53 PM
MA	Adamczyk, Monika wait lauren is the medical escalation team the ppl we transfer covid calls to?	8/26/2021, 4:54 PM
MA	Adamczyk, Monika or absence?	8/26/2021, 4:54 PM
LL	Lehmann, Lauren I send them to Medical	8/26/2021, 4:54 PM
LL	Lehmann, Lauren but when they don't answer, I send it to Absence	8/26/2021, 4:54 PM
MA	Adamczyk, Monika isnt that what we have been told	8/26/2021, 4:54 PM
MA	Adamczyk, Monika this lady was like they dont know anything..	8/26/2021, 4:55 PM
LL	Lehmann, Lauren yes, before they said the calls need to go there	8/26/2021, 4:55 PM
LL	Lehmann, Lauren how??	8/26/2021, 4:55 PM

# **EXHIBIT 88**

Short Message Report

Conversations: 1	Participants: 2
Total Messages: 17	Date Range: 10/20/2021

Outline of Conversations



**Microsoft Teams chat between [Kemp, Jennifer, Cano- Medrano, Carina]** • 17 messages on 10/20/2021 • Cano- Medrano, Carina • Kemp, Jennifer



Messages in chronological order (times are shown in GMT -05:00)

 **Microsoft Teams chat between [Kemp, Jennifer, Cano- Medrano, Carina]**

JK Kemp, Jennifer 10/20/2021, 12:44 PM  
 could you do me a favor and review HRC3920070 to see if it can be approved for a medical accommodation? We closed it on 10/4 for not engaging but the notification didnt go out. they're getting her spun up for a term meeting. Her GM confronted her about not wearing a mask/testing due to it being denied YESTERDAY. she then goes out and gets the covid note YESTERDAY stating that shes allergic to components of the vaccine. condition commenced 2016 but its a temporary RAP until 11/30/21... its just wild

CM Cano- Medrano, Carina 10/20/2021, 12:44 PM  
 Let me take a look

CM Cano- Medrano, Carina 10/20/2021, 12:48 PM  
 So I think it's bs

CM Cano- Medrano, Carina 10/20/2021, 12:48 PM  
 I have to escalate it to Sheila and Mary for approval

CM Cano- Medrano, Carina 10/20/2021, 12:48 PM  
 Lee sent an email yesterday saying that if we are denying or approving they have to get reviewed by Sheila and Mary

JK Kemp, Jennifer 10/20/2021, 12:50 PM  
 yep. lots of people trying to pull stuff now so they want to be involved

CM Cano- Medrano, Carina 10/20/2021, 12:54 PM  
 Can I mention the above about the employee now in a term. meetign?

JK Kemp, Jennifer 10/20/2021, 12:58 PM  
 theyre not yet. but they'll be part of the second wave of termination because right now shes not vax and doesnt have an approved RAP. She seems "surprised" that her case had been denied.

CM Cano- Medrano, Carina 10/20/2021, 12:58 PM  
 Smh

CM Cano- Medrano, Carina 10/20/2021, 12:58 PM  
 Her first one was a religous one too

JK Kemp, Jennifer 10/20/2021, 12:58 PM  
 yep. submitted the medical case less than 3 hours after I denied it

JK Kemp, Jennifer 10/20/2021, 12:59 PM  
 so, like.... you hadnt heard anything about your case since you opened it because you refused to submit a medical doc and didnt think to check back in a month later?

CM Cano- Medrano, Carina 10/20/2021, 1:03 PM  
 It's bullshit

CM Cano- Medrano, Carina 10/20/2021, 1:04 PM  
 If you had an allergy to a component of the vaccine you would know

CM Cano- Medrano, Carina 10/20/2021, 1:04 PM  
 It sounds like she's gettign formal testign to finalize that she has an allergy

JK Kemp, Jennifer 10/20/2021, 1:07 PM  
 right so its a "new" condition after the lawsuit was filed

APP.472

CM

Cano- Medrano, Carina

10/20/2021, 1:11 PM

Exactly

**APP.473**

**CONFIDENTIAL**

**UNITED\_SAMBRANO\_00108051**

# **EXHIBIT 89**



**Short Message Report**

Conversations: 1	Participants: 107
Total Messages: 16	Date Range: 8/18/2021

**Outline of Conversations**

 Microsoft Teams chat between [Demma, Jill, Francis, Jennifer, Woods, Sierra, Nobles, Keisha, Kelly, Adrienne, Szymkowski, Virginia, Ng, Betty, Thigpen, Sheri, Harris, Deette, Baker, Tia, Maldonado, Kat, Cleveland, Roz, Khan, Hasan, Williams, Krystal, Jaleel, Aiman, Kemp, Jennifer, Mallari, Louie, Daniels, Kimberly, Glass, Stacy, Rivera Torres, Carlos, Roque, Roman, Crawford, Clarence, Diaz-Ventura, Paul, Mahecha, Karen, Siki, Dorothy, Cano- Medrano, Carina, Curtis, Lee, Pitchford, Marshawn, Lee, Tom, Sykes, Melvin, Gutierrez, Jackie, Alejandria, Armando, Baker, Tia, Barton-Smith, Brittany, Cano- Medrano, Carina, Clark, Syreeta, Cleveland, Roz, Crawford, Clarence, Curtis, Lee, Daniels, Kimberly, Darden, Jacqueline, Demma, Jill, Diaz-Ventura, Paul, Dodd, Alillah, Dubal, John Rex, ESC - Shift\_Coord, Fox, Maeve, Francis, Jennifer, Garcia, Hanna, Garland, Antoinette, Gaston, Latoya, Gill, Rachyl, Glass, Stacy, Guiab, Kathy, Gutierrez, Jackie, Guy, Gina, Jaleel, Aiman, Kapuscik, Marilyn, Kelly, Adrienne, Kemp, Jennifer, Khan, Hasan, Lee, Tom, Love, Jasmine, Mahecha, Karen, Maldonado, Kat, Mallari, Louie, Myers, Alesa, Ng, Betty, Nobles, Keisha, Pitchford, Marshawn, Posada Duran, Mario, Preston, Kim, Rivera Torres, Carlos, Robb, Neil, Roque, Roman, Rynders, Lauren, Siki, Dorothy, Subhan, Zareena, Sykes, Melvin, Szymkowski, Virginia, Thigpen, Sheri, Williams, Krystal, Woods, Sierra, Garland, Antoinette, Rynders, Lauren, Kapuscik, Marilyn, Gaston, Latoya, Darden, Jacqueline, Guiab, Kathy, Clark, Syreeta, Gill, Rachyl, Garcia, Hanna, Myers, Alesa, Dubal, John Rex, Barton-Smith, Brittany, Subhan, Zareena, Alejandria, Armando, ESC - Shift\_Coord, Dodd, Alillah, Love, Jasmine, Guy, Gina, Posada Duran, Mario, Fox, Maeve, Adamczyk, Monika, Ramos, Alicia, Robb, Neil, Preston, Kim] • 16 messages on 8/18/2021 • Adamczyk, Monika • Alejandria, Armando • Alejandria, Armando • Baker, Tia • Baker, Tia • Barton-Smith, Brittany • Barton-Smith, Brittany • Cano- Medrano, Carina • Cano- Medrano, Carina • Clark, Syreeta • Clark, Syreeta • Cleveland, Roz • Cleveland, Roz • Crawford, Clarence • Crawford, Clarence • Curtis, Lee • Curtis, Lee • Daniels, Kimberly • Daniels, Kimberly • Darden, Jacqueline • Darden, Jacqueline • Demma, Jill • Demma, Jill • Diaz-Ventura, Paul • Diaz-Ventura, Paul • Dodd, Alillah • Dodd, Alillah • Dubal, John Rex • Dubal, John Rex • ESC - Shift\_Coord • ESC - Shift\_Coord • Fox, Maeve • Fox, Maeve • Francis, Jennifer • Francis, Jennifer • Garcia, Hanna • Garcia, Hanna • Garland, Antoinette • Garland, Antoinette • Gaston, Latoya • Gaston, Latoya • Gill, Rachyl • Gill, Rachyl • Glass, Stacy • Glass, Stacy • Guiab, Kathy • Guiab, Kathy • Gutierrez, Jackie • Gutierrez, Jackie • Guy, Gina • Guy, Gina • Harris, Deette • Jaleel, Aiman • Jaleel, Aiman • Kapuscik, Marilyn • Kapuscik, Marilyn • Kelly, Adrienne • Kelly, Adrienne • Kemp, Jennifer • Kemp, Jennifer • Khan, Hasan • Khan, Hasan • Lee, Tom • Lee, Tom • Love, Jasmine • Love, Jasmine • Mahecha, Karen • Mahecha, Karen • Maldonado, Kat • Maldonado, Kat • Mallari, Louie • Mallari, Louie • Myers, Alesa • Myers, Alesa • Ng, Betty • Ng, Betty • Nobles, Keisha • Nobles, Keisha • Pitchford, Marshawn • Pitchford, Marshawn • Posada Duran, Mario • Posada Duran, Mario • Preston, Kim • Preston, Kim • Ramos, Alicia • Rivera Torres, Carlos • Rivera Torres, Carlos • Robb, Neil • Robb, Neil • Roque, Roman • Roque, Roman • Rynders, Lauren • Rynders, Lauren • Siki, Dorothy • Siki, Dorothy • Subhan, Zareena • Subhan, Zareena • Sykes, Melvin • Sykes, Melvin • Szymkowski, Virginia • Szymkowski, Virginia • Thigpen, Sheri • Thigpen, Sheri • Williams, Krystal • Williams, Krystal • Woods, Sierra • Woods, Sierra

**APP.475**



Messages in chronological order (times are shown in GMT -05:00)

Microsoft Teams chat between [Demma, Jill, Francis, Jennifer, Woods, Sierra, Nobles, Keisha, Kelly, Adrienne, Szymkowski, Virginia, Ng, Betty, Thigpen, Sheri, Harris, Deette, Baker, Tia, Maldonado, Kat, Cleveland, Roz, Khan, Hasan, Williams, Krystal, Jaleel, Aiman, Kemp, Jennifer, Mallari, Louie, Daniels, Kimberly, Glass, Stacy, Rivera Torres, Carlos, Roque, Roman, Crawford, Clarence, Diaz-Ventura, Paul, Mahecha, Karen, Siki, Dorothy, Cano- Medrano, Carina, Curtis, Lee, Pitchford, Marshawn, Lee, Tom, Sykes, Melvin, Gutierrez, Jackie, Alejandria, Armando, Baker, Tia, Barton-Smith, Brittany, Cano- Medrano, Carina, Clark, Syreeta, Cleveland, Roz, Crawford, Clarence, Curtis, Lee, Daniels, Kimberly, Darden, Jacqueline, Demma, Jill, Diaz-Ventura, Paul, Dodd, Alillah, Dubal, John Rex, ESC - Shift\_Coord, Fox, Maeve, Francis, Jennifer, Garcia, Hanna, Garland, Antoinette, Gaston, Latoya, Gill, Rachyl, Glass, Stacy, Guiab, Kathy, Gutierrez, Jackie, Guy, Gina, Jaleel, Aiman, Kapuscik, Marilyn, Kelly, Adrienne, Kemp, Jennifer, Khan, Hasan, Lee, Tom, Love, Jasmine, Mahecha, Karen, Maldonado, Kat, Mallari, Louie, Myers, Alesa, Ng, Betty, Nobles, Keisha, Pitchford, Marshawn, Posada Duran, Mario, Preston, Kim, Rivera Torres, Carlos, Robb, Neil, Roque, Roman, Rynders, Lauren, Siki, Dorothy, Subhan, Zareena, Sykes, Melvin, Szymkowski, Virginia, Thigpen, Sheri, Williams, Krystal, Woods, Sierra, Garland, Antoinette, Rynders, Lauren, Kapuscik, Marilyn, Gaston, Latoya, Darden, Jacqueline, Guiab, Kathy, Clark, Syreeta, Gill, Rachyl, Garcia, Hanna, Myers, Alesa, Dubal, John Rex, Barton-Smith, Brittany, Subhan, Zareena, Alejandria, Armando, ESC - Shift\_Coord, Dodd, Alillah, Love, Jasmine, Guy, Gina, Posada Duran, Mario, Fox, Maeve, Adamczyk, Monika, Ramos, Alicia, Robb, Neil, Preston, Kim]

MF Fox, Maeve 8/18/2021, 8:05 AM

Good morning team, just in case you didn't get a chance to read the United News

<h3 style="margin-bottom:10px">COVID-19 vaccine RAP deadline  
</h3>

If you're unable to get the COVID-19 vaccine for medical or religious reasons, you have until Aug. 31, 2021 to request an accommodation through the Reasonable Accommodation Process (RAP). This will give United time to review your request on an individual basis and let you know whether we are able to provide a reasonable accommodation.

ST Thigpen, Sheri 8/18/2021, 8:06 AM

Good information to know! Thanks Fox, Maeve

ST Rivera Torres, Carlos 8/18/2021, 8:06 AM

Yes...there is an end in sight.

CC Crawford, Clarence 8/18/2021, 8:07 AM

File sent: flood GIF (GIF Image)

Thanks for the heads up Maeve



Image: flood GIF (GIF Image).gif (3 MB)

PV Diaz-Ventura, Paul 8/18/2021, 8:07 AM

Thank you Fox, Maeve

APP.476

! I had a lot of phone calls yesterday from employees checking on the status of their RAP. They are eager!

BN Ng, Betty 8/18/2021, 8:09 AM  
Thanks Maeve, yesssss Lee shared the information with his team on Monday.

LR Rynders, Lauren 8/18/2021, 9:33 AM  
Hi team, I need to make some updates to the West EIS Master list. Whoever is in it currently, can you message me when you're done? Thanks!

MF Fox, Maeve 8/18/2021, 9:38 AM  
Rynders, Lauren  
, even though it indicates that it is me. I promise I do not have it open File sent: 🤔



Image: ?.png (808 bytes)

ST Thigpen, Sheri 8/18/2021, 9:39 AM  
File sent: GIF by Almost Christmas Movie (GIF Image)



Image: GIF by Almost Christmas Movie (GIF Image).gif (1 MB)

CC Crawford, Clarence 8/18/2021, 9:41 AM  
File sent: Season 5 Nbc GIF by The Office (GIF Image)  
It was me. i'm out

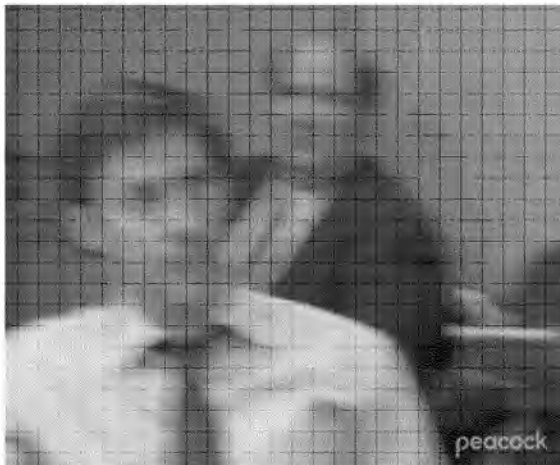


Image: Season 5 Nbc GIF by The Office (GIF Image).gif (1 MB)

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LR Rynders, Lauren 8/18/2021, 9:42 AM

Thanks!

PV Diaz-Ventura, Paul 8/18/2021, 11:14 AM

Good Morning Rivera Torres, Carlos  
Curtis, Lee  
Love, Jasmine  
Daniels, Kimberly  
Robb, Neil

PV Diaz-Ventura, Paul 8/18/2021, 11:14 AM

Today, I began receiving phone calls from employees requesting extensions to the 8/31 deadline for RAP as they are having a hard time getting into their HCP to fill out the required documentation. I have indicated that the 8/31 deadline is company-wide. I want to ensure I am conveying the appropriate message to any employee that calls in. Is that correct?

I have been informing callers that

the HR Mgt team will review all requests, and we do not have a timeline.

Some additional questions that have begun to be surface are below.

<ol>

Is there a deadline for United to advise the employee on the status of their RAP?

Will there be an actual RAP meeting held with the employee, their HR Partner, and ESCMD?

</ol>

Thank you!

JK Kemp, Jennifer 8/18/2021, 11:27 AM

Moving forward, please advise employees that "a review committee will research each case and render a decision" rather than HR Management Team. If they question who is on the committee advise you can only confirm there is a cross section of United business leaders, we cannot elaborate further at this time. The deadline for initiating a RAP regarding the COVID19 vaccine mandate is 8/31/21, and there will be no extension beyond that date. There is no deadline for United to advise of their RAP status but due to the volume we ask employees to be patient while we review At this time the process does not include holding a RAP meeting, unless there are extenuating circumstances which we would need to gather more information.

PV Diaz-Ventura, Paul 8/18/2021, 11:28 AM

Thank you, Kemp, Jennifer  
This information is very helpful. I apologize if any of this was communicated during the briefing last week. I was on

**APP.478**

vacation. I appreciate you!

BN

Ng, Betty

8/18/2021, 11:34 AM

Well said Jen, I will be using this verbiage next week! Thanks again File sent: 📎



Image: 2.png (653 bytes)



# **EXHIBIT 90**

**From:** Kate.Gebo@united.com  
**To:** Limacher, Kirk  
**CC:** Wit, Vania  
**Sent:** 9/28/2021 6:43:39 AM  
**Subject:** Re: Over 99% of active employees reporting vaccination

Got it. Congratulations...this is great news.

We will need to update at the officer meeting. I've let Kam know that we need an update from you, Vania and Sasha. If there are others to add let her know.

Kate

Sent from my iPad

On Sep 28, 2021, at 6:41 AM, Limacher, Kirk <kirk.limacher@united.com> wrote:

They did not engage in RAP and have no extension.

**Kirk Limacher**

VP, HR Services  
United Airlines | Corporate Support Center  
872.825.6294 – Office  
312.465.3629 -- Cell

**From:** Gebo, Kate <Kate.Gebo@united.com>  
**Sent:** Tuesday, September 28, 2021 6:40 AM  
**To:** Limacher, Kirk <kirk.limacher@united.com>  
**Cc:** Wit, Vania <vania.wit@united.com>  
**Subject:** Re: Over 99% of active employees reporting vaccination

Hi Kirk,

Just to clarify, does the 600 include anyone who has submitted a rap or is this only people that have truly not engaged meaning no rap and haven't uploaded their card?

Thanks

Kate

Sent from my iPad

On Sep 28, 2021, at 6:36 AM, Limacher, Kirk <kirk.limacher@united.com> wrote:

Good morning,

Great news! Less than 1% of our active employee population are out of compliance with our vaccination requirement. And, while the table is showing 600 active employees out of compliance, I expect that number to go lower as we complete data clean-up today. I'll provide another update later today. Beginning later today and into tomorrow morning, we'll notify out of compliance employees that they will be held out of service beginning September 30<sup>th</sup> which starts the CBA-driven termination process.

If you have any questions, please let me know.

**APP.481**

Category	Count	Percentage
Fully Vaccinated	59,800	94%
Partially Vaccinated	1,000	2%
Approved RAP	2,125	3%
Unvaccinated (pending termination)	600	1%
Extended deadline (unvaccinated)	375	1%
Total	63,900	100%

**Kirk Limacher**

VP, HR Services

United Airlines | Corporate Support Center

872.825.6294 – Office

312.465.3629 -- Cell

# **EXHIBIT 91**



**From:** Robb, Neil </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5102C14D51C44BBB87A82B14107B42AC-U368374>  
**To:** Krabbe, Bob; Sasse, Michael; Brown, Marcus  
**Sent:** 10/26/2021 9:38:09 AM  
**Subject:** RE: RAP request

This is for religious. I can send her an email saying it is too late.

-----Original Message-----

From: Krabbe, Bob <Bob.Krabbe@united.com>  
Sent: Tuesday, October 26, 2021 9:09 AM  
To: Robb, Neil <neil.rob@united.com>; Sasse, Michael <michael.sasse@united.com>; Brown, Marcus <marcus.brown@united.com>  
Subject: RE: RAP request

Is this for a religious RAP or Medical? If it is for religious (my guess), I would say too late; if for Medical, she should submit through HelpHub.

Bob Krabbe (he/him/his)  
Director, Labor Relations - Flight

United | Corporate Support Center  
233 S. Wacker Drive, 25th Floor WHQLR | Chicago, IL 60606 Tel 872 825 1036 | Cell 224 287 2247 | Bob.Krabbe@united.com united.com

-----Original Message-----

From: Robb, Neil <neil.rob@united.com>  
Sent: Tuesday, October 26, 2021 8:56 AM  
To: Sasse, Michael <michael.sasse@united.com>; Krabbe, Bob <Bob.Krabbe@united.com>  
Subject: FW: RAP request

One more FA requesting RAP late in the game. Let me know how you want to handle. I am prepared to send an email that she missed the deadline.

-----Original Message-----

From: Sucher, Kyle <kyle.sucher@united.com>  
Sent: Tuesday, October 26, 2021 8:48 AM  
To: Robb, Neil <neil.rob@united.com>  
Subject: FW: RAP request

-----Original Message-----

From: Coffie, Kristy <Kristy.Coffie@united.com>  
Sent: Monday, October 25, 2021 6:44 PM  
To: Kate Gebo <KateGebo@united.com>  
Cc: Jackson, Ivan <Ivan.Jackson@united.com>  
Subject: RAP request

Hello,  
I tried submitting a RAP request through help hub and keep getting an error message that deadline was August 31. How can I get my RAP request submitted?

Kristy Coffie  
CLESW  
U284793

# **EXHIBIT 92**

**From:** Haralabopoulos, Peter </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=65D37318661E42BABBA094A53978988F-U272454>  
**To:** Krabbe, Bob; Nau, Sarah  
**CC:** Catanzano, Jessica  
**Sent:** 3/5/2021 4:12:26 PM  
**Subject:** RE: Mandatory COVID-19 Vaccination Policy and RAP

Thank you both for your input!

**From:** Haralabopoulos, Peter  
**Sent:** Friday, March 5, 2021 5:03 AM  
**To:** Krabbe, Bob <Bob.Krabbe@united.com>; Nau, Sarah <sarah.nau@united.com>  
**Cc:** Catanzano, Jessica <jessica.catanzano@united.com>  
**Subject:** Mandatory COVID-19 Vaccination Policy and RAP

Good Morning Bob and Sarah! Hope this finds you both well.

I am on a cross-functional team, led by Kirk Limacher, working on one of the many workstreams for when/if we decide to go down the mandatory vaccination route for our employees.

We have a draft policy, and now working on what RAP would look like for each workgroup. Specifically, we are gathering info by workgroup on what medical and religious accommodation would look like, as well as refusal to vaccinate.

This is all coming together in a matrix which Kirk will walk through for Kate Gebo in the next week or two, so we can better understand logistics, but also the people and financial impact.

I will set-up some time to review Flt Ops, Flight Qualified, and Inflight with you. This will take no more than 20-30 minutes.

Feel free to invite or delegate to others on your team. Basically, we are looking for the FO and SW contractual experts on medical and personal LOA.

As we are still exploring the "what if" of going mandatory, this is not for broad communication.

Thank you in advance,

Peter

**Peter Haralabopoulos, SPHR**  
Senior Manager - Human Resources Partner

United | San Francisco Int'l Airport  
Terminal 3 Mezzanine - SFOHR  
San Francisco, CA 94128  
tel 650.874.4362 | cell 650.533.7164  
[peter.haralabopoulos@united.com](mailto:peter.haralabopoulos@united.com)  
united.com

*"Diversity is a Fact - Equity is a Choice -  
Inclusion is an Action - Belonging is an Outcome"*

# **EXHIBIT 93**



**From:** Rivera Torres, Carlos [carlos.riveratorres@united.com]  
**Sent:** 1/11/2022 4:32:29 PM  
**To:** Frederick, Sheila [sheila.frederick@united.com]  
**CC:** O'Neil, Mary [mary.c.oneil@united.com]; ESCMD [opcmed@united.com]; Corp Med [CorpMed@united.com]; Baylis, Pat [Pat.Baylis@united.com]  
**Subject:** RE: [EXTERNAL] Appeal for denial of medical exemption - u159517 James Engstrom  
**Attachments:** 159517 - Medical note (11-01-21).pdf

# Redacted - Privileged

Thanks,  
Carlos

Carlos Rivera Torres  
ESC Manager – West Region  
Absence Management

United | Corporate Support Center  
233 South Wacker Drive, 16th Floor | Chicago, IL 60606  
Tel: 847 700 3296 | Mobile 312 802 0836 | [carlos.riveratorres@united.com](mailto:carlos.riveratorres@united.com)

**From:** Frederick, Sheila <sheila.frederick@united.com>  
**Sent:** Tuesday, January 11, 2022 4:14 PM  
**To:** Rivera Torres, Carlos <carlos.riveratorres@united.com>  
**Cc:** O'Neil, Mary <mary.c.oneil@united.com>  
**Subject:** RE: [EXTERNAL] Appeal for denial of medical exemption - u159517 James Engstrom

## Redacted - Privileged

Sheila P. Frederick  
Associate General Counsel, Labor and Employment Law

United Airlines, Inc.  
233 S. Wacker Drive – 11th Floor | Chicago, IL 60606  
Tel 872-825-7654 | [sheila.frederick@united.com](mailto:sheila.frederick@united.com)

**From:** Rivera Torres, Carlos <carlos.riveratorres@united.com>  
**Sent:** Tuesday, January 11, 2022 11:05 AM  
**To:** Frederick, Sheila <sheila.frederick@united.com>  
**Cc:** O'Neil, Mary <mary.c.oneil@united.com>  
**Subject:** RE: [EXTERNAL] Appeal for denial of medical exemption - u159517 James Engstrom

Good Morning,

# Redacted - Privileged

APP.488

# Redacted - Privileged

Carlos Rivera Torres  
ESC Manager – West Region  
Absence Management

United | Corporate Support Center  
233 South Wacker Drive, 16th Floor | Chicago, IL 60606  
Tel. 847 700 3296 | Mobile 312 802 0836 | [carlos.riveratorres@united.com](mailto:carlos.riveratorres@united.com)

---

**From:** Frederick, Sheila <[sheila.frederick@united.com](mailto:sheila.frederick@united.com)>  
**Sent:** Tuesday, January 11, 2022 10:45 AM  
**To:** Rivera Torres, Carlos <[carlos.riveratorres@united.com](mailto:carlos.riveratorres@united.com)>  
**Cc:** O'Neil, Mary <[mary.c.oneil@united.com](mailto:mary.c.oneil@united.com)>  
**Subject:** FW: [EXTERNAL] Appeal for denial of medical exemption

**APP.489**

**CONFIDENTIAL**

**UNITED\_SAMBRANO\_00138973**

# Redacted - Privileged

Sheila P. Frederick  
Associate General Counsel, Labor and Employment Law

United Airlines, Inc.  
233 S. Wacker Drive – 11th Floor | Chicago, IL 60606  
Tel 872-825-7654 | sheila.frederick@united.com

**From:** Hassell, Mark <mark.hassell@united.com>  
**Sent:** Tuesday, January 11, 2022 10:41 AM  
**To:** Frederick, Sheila <sheila.frederick@united.com>; Nau, Sarah <sarah.nau@united.com>; Thompson, Jennifer <Jennifer.Thompson@united.com>  
**Subject:** FW: [EXTERNAL] Appeal for denial of medical exemption

# Redacted - Privileged

Mark

**From:** [REDACTED]  
**Sent:** Tuesday, December 21, 2021 1:57 PM  
**To:** Hassell, Mark <mark.hassell@united.com>  
**Cc:** [REDACTED]  
**Subject:** [EXTERNAL] Appeal for denial of medical exemption

This message was sent from outside of United Airlines. Please do not click links or open attachments unless you recognize the sender and know that the content is safe.

December 21, 2021

United Airlines Human Resources- Mr Mark Hassell

My name is [REDACTED] and I am a 777 First Officer with United Airlines. I would like to appeal United's denial of my request for a medical exemption by Mr Carlos Rivera Torres. I have submitted a letter from Dr. Tsifutis which detailed my medical concerns for taking the Covid shot due to family history of thromboembolic issues. I personally know of at least one other pilot that has received a medical exemption for the same concerns. I also know, as I'm sure you do, that there are pilots that have received both religious and medical exemptions.

This is extremely important to me as the medical exemption would allow me to use my contractually earned sick time. This denial of a medical exemption because I have already received a religious exemption is inconsistent with the treatment of other employees who are similarly situated.

Jennifer Kemp from Hub Help said there is no appeals process established and their communication to me has been very slow and entirely lacking in specificity as to why I was denied. She only suggested that I contact Mr. Mark Hassell in HR.

I request that my medical exemption be granted and I be placed on medical leave retroactively to the day my request was denied. Please advise as soon as possible.

I believe the reference codes are HRC4137304 and HRC4020359.

Thank you

[REDACTED]  
U159517

APP.490

# **EXHIBIT 94**



**From:** Rogers, Carol [Carol.Rogers@united.com]  
**Sent:** 8/31/2021 2:12:37 PM  
**To:** Baylis, Pat [Pat.Baylis@united.com]  
**Subject:** RE: COVID Vaxx Exemption RAP- MD EWRSW Suzie Esper U165747

Wow! I finally had time to read this. Incredible that they want the lawyers to weigh in on this!

Carol Rogers, SHRM-CP, PHR  
Sr. Manager Corporate Medical - WHQMD  
872 825-3638 (Willis) or 847 224-4125 (mobile)



---

**From:** Baylis, Pat <Pat.Baylis@united.com>  
**Sent:** Monday, August 30, 2021 5:20 PM  
**To:** Rogers, Carol <Carol.Rogers@united.com>  
**Subject:** RE: COVID Vaxx Exemption RAP- MD EWRSW Suzie Esper U165747

No. I was just trying to show you that they have been told not to use me and so they go to the lawyers to make a medical decision.

---

**From:** Rogers, Carol <Carol.Rogers@united.com>  
**Sent:** Monday, August 30, 2021 5:18 PM  
**To:** Baylis, Pat <Pat.Baylis@united.com>  
**Subject:** RE: COVID Vaxx Exemption RAP- MD EWRSW Suzie Esper U165747

Did you mean to send this to Carina?

Carol Rogers, SHRM-CP, PHR  
Sr. Manager Corporate Medical - WHQMD  
872 825-3638 (Willis) or 847 224-4125 (mobile)



---

**From:** Baylis, Pat <Pat.Baylis@united.com>  
**Sent:** Monday, August 30, 2021 5:12 PM  
**To:** Rogers, Carol <Carol.Rogers@united.com>  
**Subject:** FW: COVID Vaxx Exemption RAP- MD EWRSW Suzie Esper U165747

They are sending this to the lawyers and it is a medical determination. They just need to make a decision.

---

**From:** ESCMD <opcmd@united.com>  
**Sent:** Monday, August 30, 2021 5:00 PM  
**To:** Frederick, Sheila <sheila.frederick@united.com>; Toth, Megan P. <MToth@seyfarth.com>  
**Cc:** Curtis, Lee <mark.curtis@united.com>; Baylis, Pat <Pat.Baylis@united.com>  
**Subject:** COVID Vaxx Exemption RAP- MD EWRSW Suzie Esper U165747

Hello Sheila and Megan,

# Redacted - Privileged

**APP.493**

**CONFIDENTIAL**

**UNITED\_SAMBRANO\_00139075**

## Diphtheria, Tetanus, and Pertussis (DTaP) Vaccines

There are 7 pediatric DTaP vaccines licensed and currently used in the United States: Daptacel®, Infanrix®, Kinrix®, Pediarix®, Pentacel®, Quadricel®, and Vaxelis®.

Each 0.5-mL dose of Daptacel® (Sanofi Pasteur) contains 15 Lf diphtheria toxoid, 5 Lf tetanus toxoid, and acellular pertussis antigens (10 µg detoxified pertussis toxin (PT), 3 µg filamentous hemagglutinin (FHA), 3 µg pertactin, and 5 µg fimbriae types 2 and 3 (FIM)). Other ingredients per 0.5-mL dose include 1.5 mg aluminum phosphate (0.33 mg of aluminum) as the adjuvant, ≤5 µg residual formaldehyde, <50 nanogram (ng) residual glutaraldehyde and 3.3 mg (0.6% volume per volume (v/v)) 2-phenoxyethanol (not as a preservative).

Each 0.5-mL dose of Infanrix® (GlaxoSmithKline) contains 25 Lf of diphtheria toxoid, 10 Lf of tetanus toxoid, 25 µg of inactivated PT, 25 µg of FHA, and 8 µg of pertactin (69 kilodalton outer membrane protein). Each 0.5-mL dose contains aluminum hydroxide as adjuvant (not more than 0.625 mg aluminum by assay) and 4.5 mg of sodium chloride. Each dose also contains ≤100 µg of residual formaldehyde and ≤100 µg of polysorbate 80 (Tween 80).

Each 0.5-mL dose of Kinrix® (GlaxoSmithKline) includes the same diphtheria, tetanus, and pertussis components listed in Infanrix® above, and includes 40 D-antigen Units (DU) of Type 1 poliovirus (Mahoney), 8 DU of Type 2 poliovirus (MEF-1), and 32 DU of Type 3 poliovirus (Saukett). Each 0.5-mL dose contains aluminum hydroxide as adjuvant (not more than 0.6 mg aluminum by assay) and 4.5 mg of sodium chloride. Each dose also contains ≤100 µg of residual formaldehyde and ≤100 µg of polysorbate 80 (Tween 80). The manufacturing process of the poliovirus vaccine uses neomycin sulfate and polymyxin B. Those ingredients may be present in the final vaccine at ≤0.05 ng neomycin and ≤0.01 ng polymyxin B per dose.

Each 0.5-mL dose of Pediarix® (GlaxoSmithKline) includes the same diphtheria, tetanus, and pertussis components listed in Infanrix® above, the poliovirus components listed in Kinrix® above, and 10 µg of hepatitis B virus surface antigen (HBsAg). Each 0.5-mL dose contains aluminum salts as adjuvant (not more than 0.85 mg aluminum by assay) and 4.5 mg of sodium chloride. Each dose also contains ≤100 µg of residual formaldehyde and ≤100 µg of polysorbate 80 (Tween 80). The manufacturing process of the poliovirus vaccine uses neomycin sulfate and polymyxin B. Those ingredients may be present in the final vaccine at ≤0.05 ng neomycin and ≤0.01 ng polymyxin B per dose. The procedures used to manufacture the HBsAg antigen result in a product that contains ≤5% yeast protein.

Each 0.5-mL dose of Pentacel® (Sanofi Pasteur) contains 15 Lf diphtheria toxoid, 5 Lf tetanus toxoid, acellular pertussis antigens (20 µg detoxified PT, 20 µg FHA, 3 µg pertactin, 5 µg RM), inactivated polioviruses (40 DU Type 1 (Mahoney), 8 DU Type 2 (MEF-1), 32 DU Type 3 (Saukett)), and 10 µg polyribosyl-ribitol-phosphate (PRP) of *H. influenzae* type b covalently bound to 24 µg of tetanus toxoid (PRP-T). Other ingredients per 0.5-mL dose include 1.5 mg aluminum phosphate (0.33 mg aluminum) as the adjuvant, polysorbate 80 (approximately 10 parts per million by calculation), 42.5 mg sucrose, ≤5 µg residual formaldehyde, <50 ng residual glutaraldehyde, ≤50 ng residual bovine serum albumin, 3.3 mg (0.6% v/v) 2-phenoxyethanol (not as a preservative), <4 picogram (pg) of neomycin, and <4 pg polymyxin B sulfate.

Each 0.5-mL dose of Quadricel® (Sanofi Pasteur) contains 15 Lf diphtheria toxoid, 5 Lf tetanus toxoid, acellular pertussis antigens (20 µg detoxified PT, 20 µg FHA, 3 µg pertactin, 5 µg RM), and inactivated polioviruses (40 DU Type 1 (Mahoney), 8 DU Type 2 (MEF-1), 32 DU Type 3 (Saukett)). Other ingredients per 0.5-mL dose include 1.5 mg aluminum phosphate (0.33 mg aluminum) as the adjuvant, polysorbate 80 (approximately 10 parts per million by calculation), ≤5 µg residual formaldehyde, <50 ng residual glutaraldehyde, ≤50 ng residual bovine serum albumin, 3.3 mg (0.6% v/v) 2-phenoxyethanol (not as a preservative), <4 pg of neomycin, and <4 pg polymyxin B sulfate. Quadricel® does not contain a preservative.

Each 0.5 mL dose of Vaxelis® (MCM Vaccine Company) contains 15 Lf diphtheria toxoid, 5 Lf tetanus toxoid, acellular pertussis antigens (10 µg detoxified PT, 20 µg FHA, 3 µg pertactin, 5 µg FIM), inactivated polioviruses (29 DU Type 1 (Mahoney), 7 DU Type 2 (MEF-1), 26 DU Type 3 (Saukett)), 3 µg PRP of *H. influenzae* type b covalently bound to 50 µg of the outer membrane protein complex (OMP) of *Neisseria meningitidis* serogroup B, and 10 µg HBsAg. Each 0.5 mL dose also contains 319 µg aluminum from aluminum salts used as adjuvants. Other ingredients per 0.5 mL dose include <0.0056% polysorbate 80 and the following residuals from the manufacturing process: ≤1.4 mcg formaldehyde, ≤50 ng glutaraldehyde, ≤50 ng bovine serum albumin, <5 ng of neomycin, <200 ng streptomycin sulfate, <25 ng polymyxin B sulfate, ≤0.125 µg ammonium metavanadate, and ≤0.1 mcg yeast protein (maximum 1% relative to HBsAg protein).

Thank you,

Carina  
Medical Specialist- RN  
United Medical - OPCMD  
1-877-UAL-ESC9

*This message, including any attachments, contains confidential information intended only for the use of the addressee(s) named above and may contain information that is legally privileged and/or protected, including confidential personnel information of a highly sensitive nature (including, but not limited to, medical information) subject to United's rules and regulations regarding confidentiality as well as confidentiality provisions contained in various state and federal laws. If you are not the addressee, or the person responsible for delivering it to the addressee, you are hereby notified that reading, disseminating, distributing or copying this message is strictly prohibited. If you have received this message by mistake, please immediately notify us by replying to the message and delete the original message immediately thereafter. Thank you for your cooperation.*



# **EXHIBIT 95**



**From:** Robb, Neil [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5102C14D51C44BBB87A82B14107B42AC-U368374]  
**Sent:** 10/27/2021 11:14:38 AM  
**To:** Sharma, Garima [garima.sharma@united.com]; Catanzano, Jessica [jessica.catanzano@united.com]  
**CC:** Thacker, Bryan [bryan.thacker@united.com]  
**Subject:** RE: DJ Jonas <stop outbound calls and delay termination warning>

All the positive cases that are reported to us are in HH.

**From:** Sharma, Garima <garima.sharma@united.com>  
**Sent:** Wednesday, October 27, 2021 9:55 AM  
**To:** Robb, Neil <neil.robb@united.com>; Catanzano, Jessica <jessica.catanzano@united.com>  
**Cc:** Thacker, Bryan <bryan.thacker@united.com>  
**Subject:** RE: DJ Jonas <stop outbound calls and delay termination warning>

Hi Neil,

Are all the positive cases stored in Help hub? This employee had not uploaded a positive test result in the new testing module so assuming they may have informed the ESC about their positive COVID result. We would probably need to load that data sources to be able to catch these scenarios.

Thanks,  
Garima

**From:** Limacher, Kirk <kirk.limacher@united.com>  
**Sent:** Wednesday, October 27, 2021 8:01 AM  
**To:** Pape, Colleen <Colleen.Pape@united.com>; Shanley, Kim <Kim.Shanley@united.com>; Robb, Neil <neil.robb@united.com>; Catanzano, Jessica <jessica.catanzano@united.com>; Sharma, Garima <garima.sharma@united.com>  
**Cc:** O'Neil, Mary <mary.c.oneil@united.com>  
**Subject:** RE: DJ Jonas <stop outbound calls and delay termination warning>

No worries. How could you have known? 😊.

Thanks for the update.

**Kirk Limacher**  
VP, HR Services  
United Airlines | Corporate Support Center  
872.825.6294 – Office  
312.465.3629 -- Cell

**From:** Pape, Colleen <Colleen.Pape@united.com>  
**Sent:** Wednesday, October 27, 2021 7:53 AM  
**To:** Limacher, Kirk <kirk.limacher@united.com>; Shanley, Kim <Kim.Shanley@united.com>; Robb, Neil <neil.robb@united.com>; Catanzano, Jessica <jessica.catanzano@united.com>; Sharma, Garima <garima.sharma@united.com>  
**Cc:** O'Neil, Mary <mary.c.oneil@united.com>  
**Subject:** RE: DJ Jonas <stop outbound calls and delay termination warning>

Good morning Kirk,

APP.496

# Redacted - Privileged

Have a good day!

Take care,

*Colleen*

**Colleen Pape**

Manager, Employee Service Center (ESC) Operations  
(HR Operations/System Bid)

United | Corporate Support Center  
233 S. Wacker Drive WHQHR 25th Floor | Chicago, IL 60606  
Tel 847-700-4978 | [colleen.pape@united.com](mailto:colleen.pape@united.com)



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**From:** Limacher, Kirk <[kirk.limacher@united.com](mailto:kirk.limacher@united.com)>

**Sent:** Wednesday, October 27, 2021 7:29 AM

**To:** Shanley, Kim <[Kim.Shanley@united.com](mailto:Kim.Shanley@united.com)>; Pape, Colleen <[Colleen.Pape@united.com](mailto:Colleen.Pape@united.com)>; Robb, Neil <[neil.robb@united.com](mailto:neil.robb@united.com)>; Catanzano, Jessica <[jessica.catanzano@united.com](mailto:jessica.catanzano@united.com)>; Sharma, Garima <[garima.sharma@united.com](mailto:garima.sharma@united.com)>

**Cc:** ONeil, Mary <[mary.c.oneil@united.com](mailto:mary.c.oneil@united.com)>

**Subject:** FW: [DJ Jonas <stop outbound calls and delay termination warning>](#)

# Redacted - Privileged

**Kirk Limacher**

VP, HR Services

United Airlines | Corporate Support Center

872.825.6294 – Office

312.465.3629 – Cell

**From:** ONeil, Mary <[mary.c.oneil@united.com](mailto:mary.c.oneil@united.com)>

**Sent:** Tuesday, October 26, 2021 10:15 PM

APP.497

CONFIDENTIAL

UNITED\_SAMBRANO\_00140667

**To:** Limacher, Kirk <kirk.limacher@united.com>  
**Cc:** Frederick, Sheila <sheila.frederick@united.com>  
**Subject:** Fwd: DJ Jonas

**Redacted - Privileged**

Begin forwarded message:

**From:** "Stringfellow, Jodi" <Jodi.Stringfellow@united.com>  
**Date:** October 26, 2021 at 10:11:50 PM EDT  
**To:** "Cooney, Julianne" <Julianne.Cooney@united.com>, "ONEil, Mary" <mary.c.oneil@united.com>  
**Subject:** DJ Jonas

Hi Julianne -

**Redacted - Privileged**

Thanks,  
Jodi

# **EXHIBIT 96**



**From:** Muenkel, Dan [Dan.Muenkel@united.com]  
**Sent:** 8/26/2021 2:43:09 PM  
**To:** Robb, Neil [neil.robb@united.com]  
**Subject:** Re: COVID-19 RAPs submitted on September 1st and after

No I think we need to show we considered vs auto disallowed. However what I saw in the email is my only background on this too. I think this is like the new hires where they'll be able to submit but they'll be denied.

Dan Muenkel  
Sent from mobile device

---

**From:** Robb, Neil <neil.robb@united.com>  
**Sent:** Thursday, August 26, 2021 2:33:40 PM  
**To:** Muenkel, Dan <Dan.Muenkel@united.com>  
**Subject:** RE: COVID-19 RAPs submitted on September 1st and after

Is the expectation to have a message auto generated to the employee post submission with this language?

---

**From:** Muenkel, Dan <Dan.Muenkel@united.com>  
**Sent:** Thursday, August 26, 2021 2:33 PM  
**To:** Frederick, Sheila <sheila.frederick@united.com>; O'Neil, Mary <mary.c.oneil@united.com>; Limacher, Kirk <kirk.limacher@united.com>; Robb, Neil <neil.robb@united.com>  
**Subject:** RE: COVID-19 RAPs submitted on September 1st and after

Thanks all.

**Redacted - Privileged**

Thanks!  
**Dan Muenkel**  
Managing Director – Employee Experience / People Analytics / HR PMO  
Tel 872.825.4361 | Mobile 224.201.5816

---

**From:** Frederick, Sheila <sheila.frederick@united.com>  
**Sent:** Thursday, August 26, 2021 1:51 PM  
**To:** O'Neil, Mary <mary.c.oneil@united.com>; Limacher, Kirk <kirk.limacher@united.com>; Robb, Neil <neil.robb@united.com>  
**Cc:** Muenkel, Dan <Dan.Muenkel@united.com>  
**Subject:** RE: COVID-19 RAPs submitted on September 1st and after

**Redacted - Privileged**

**Sheila P. Frederick**  
Assistant General Counsel, Labor and Employment Law

United Airlines, Inc.  
233 S. Wacker Drive – 11th Floor | Chicago, IL 60606  
Tel 872-825-7654 | sheila.frederick@united.com

---

**From:** O'Neil, Mary <mary.c.oneil@united.com>  
**Sent:** Thursday, August 26, 2021 1:50 PM

**APP.500**

**To:** Limacher, Kirk <kirk.limacher@united.com>; Frederick, Sheila <sheila.frederick@united.com>; Robb, Neil <neil.robb@united.com>; Frederick, Sheila <sheila.frederick@united.com>  
**Cc:** Muenkel, Dan <Dan.Muenkel@united.com>  
**Subject:** RE: COVID-19 RAPs submitted on September 1st and after

**Redacted - Privileged**

**From:** Limacher, Kirk <kirk.limacher@united.com>  
**Sent:** Thursday, August 26, 2021 2:43 PM  
**To:** Frederick, Sheila <sheila.frederick@united.com>; O'Neil, Mary <mary.c.oneil@united.com>; Robb, Neil <neil.robb@united.com>; Frederick, Sheila <sheila.frederick@united.com>  
**Cc:** Muenkel, Dan <Dan.Muenkel@united.com>  
**Subject:** COVID-19 RAPs submitted on September 1st and after

Mary/Sheila/Neil,

**Redacted - Privileged**

Thanks!

**Kirk Limacher**  
VP, HR Services  
United Airlines | Corporate Support Center  
872.825.6294 – Office  
312.465.3629 -- Cell

**APP.501**

**CONFIDENTIAL**

**UNITED\_SAMBRANO\_00140928**

# **EXHIBIT 97**

**From:** Limacher, Kirk [kirk.limacher@united.com]  
**Sent:** 5/3/2021 9:09:30 AM  
**To:** Johnson, Sasha [Sasha.Johnson@united.com]  
**Subject:** FW: Vaccine mandate (timeline and financials)  
**Attachments:** Mandate & Rap process proposal.30Apr2021.pptx

Per our discussion; deck attached.

**Kirk Limacher**  
VP, HR Services  
United Airlines | Corporate Support Center  
872.825.6294 – Office  
312.465.3629 -- Cell

---

**From:** Limacher, Kirk  
**Sent:** Monday, May 3, 2021 6:13 AM  
**To:** Gebo, Kate <Kate.Gebo@united.com>  
**Cc:** Jones, Zachery - LR <Zachery.Jones@united.com>  
**Subject:** RE: Vaccine mandate (timeline and financials)

Good morning, Kate.

Just to confirm; are you asking that we get time @ eTeam next Wednesday (May 12<sup>th</sup>) to discuss mandate?

**Redacted - Privileged**

Thanks!

**Kirk Limacher**  
VP, HR Services  
United Airlines | Corporate Support Center  
872.825.6294 – Office  
312.465.3629 -- Cell

---

**From:** Gebo, Kate <Kate.Gebo@united.com>  
**Sent:** Sunday, May 2, 2021 3:12 PM  
**To:** Limacher, Kirk <kirk.limacher@united.com>  
**Cc:** Jones, Zachery - LR <Zachery.Jones@united.com>  
**Subject:** RE: Vaccine mandate (timeline and financials)

Hi Kirk  
I'd like to hold this for Wednesday of next week instead of Monday.

I talked to Scott today and he is supportive of a air crew only mandate because of 1) the instability of the healthcare systems of some of the international locations and 2) the likelihood of various governmental entities to mandate a vaccine is high.

I would expect Scott to push back on October 1 and we will need to have Terri weigh in on the optics of exiting people prior to PSP expiring.

**APP.503**



I would also like to better understand the info on slide 4 about the pilots.

Thanks

Kate

---

**From:** Limacher, Kirk <kirk.limacher@united.com>

**Sent:** Friday, April 30, 2021 5:24 PM

**To:** Gebo, Kate <Kate.Gebo@united.com>

**Cc:** Jones, Zachery - LR <Zachery.Jones@united.com>

**Subject:** RE: Vaccine mandate (timeline and financials)

Hi, Kate.

This is an updated version of the vaccination mandate deck including updated financials (see slide #7). I am assuming we'll need to reference both the high level timeline and financial analysis at some point next week.

Have a great weekend!

**Kirk Limacher**

VP, HR Services

United Airlines | Corporate Support Center

872.825.6294 – Office

312.465.3629 -- Cell

---

**From:** Limacher, Kirk

**Sent:** Friday, April 9, 2021 7:00 AM

**To:** 'Gebo, Kate' <kate.gebo@united.com>

**Subject:** Vaccine mandate (timeline and financials)

Good morning, Kate.

Let's spend some of our 1/1 review the attached deck which covers a proposed mandate timeline/approach, the RAP process, and potential financial impact.

See you at 9 AM.

Thanks.

**Kirk Limacher**

VP, HR Services

United Airlines | Corporate Support Center

872.825.6294 – Office


312.465.3629 -- Cell

# **EXHIBIT 98**


## Short Message Report

Conversations: 1	Participants: 5
Total Messages: 271	Date Range: 8/6/2021

### Outline of Conversations

-  **Microsoft Teams chat between [Banks, Sonya, Parker, Chasmyn, Lehmann, Lauren, George, Mary, Adamczyk, Monika]** • 271 messages on 8/6/2021 • Adamczyk, Monika • Banks, Sonya • George, Mary • Lehmann, Lauren • Parker, Chasmyn

Messages in chronological order (times are shown in GMT -05:00)

 **Microsoft Teams chat between [Banks, Sonya, Parker, Chasmyn, Lehmann, Lauren, George, Mary, Adamczyk, Monika]**

MG George, Mary 8/6/2021, 8:04 AM  
United did it. Vaccines are now required for everyone. People are going to be PISSED


MG George, Mary 8/6/2021, 8:06 AM  
They'll be firing people at the end of November if they don't get vaccinated


MA Adamczyk, Monika 8/6/2021, 8:06 AM  
INSANE

LL Lehmann, Lauren 8/6/2021, 8:07 AM  
These people are probably going to do what they have been doing... buying fake vaccine cards and adding it, or filing a "religious exemption"

MA Adamczyk, Monika 8/6/2021, 8:07 AM  
that what its come down to

LL Lehmann, Lauren 8/6/2021, 8:08 AM  
Our employees cannot be trusted and they don't trust us so it's messed up all the way around.

MA Adamczyk, Monika 8/6/2021, 8:08 AM  
File sent: 

  
Image: ??.png (1 KB)

LL Lehmann, Lauren 8/6/2021, 8:08 AM  
but we knew this would happen

MA Adamczyk, Monika 8/6/2021, 8:08 AM  
not this soon

MG George, Mary 8/6/2021, 8:09 AM  
True. Til someone finds out and they'll get fired anyways

MG George, Mary 8/6/2021, 8:10 AM  
And I guess they're giving us one days pay...like that lady told Sonya, BIG WHOOP

LL Lehmann, Lauren 8/6/2021, 8:10 AM  
i saw that! I was like, that's it?!?!?

LL Lehmann, Lauren 8/6/2021, 8:10 AM  
we can't even get 2 or 3?!? wow!

MG George, Mary 8/6/2021, 8:12 AM  
Right, same

MG George, Mary 8/6/2021, 8:17 AM  
They missed one question that people will ask...when is the one day being added

LL Lehmann, Lauren 8/6/2021, 8:18 AM

APP.507



i think that will depend on the timing of the FDA approval....if it gets pushed up and the requirements is needed before 10/25, they might give us the day sooner or later

MG George, Mary 8/6/2021, 8:23 AM  
Ya you're probably right, they'll give it to everyone at the same time

MG George, Mary 8/6/2021, 8:23 AM  
Get ready for people cussing us out on the phone

LL Lehmann, Lauren 8/6/2021, 8:24 AM  
lol, im hanging right up if that happens. Call Scott, Brett and Kate with that BS!

SB Banks, Sonya 8/6/2021, 8:30 AM  
They wont do it over the phone....the fingers behind a screen are more powerful than over the phone

LL Lehmann, Lauren 8/6/2021, 8:30 AM  
lol! right, they get extra bold when typing!

LL Lehmann, Lauren 8/6/2021, 8:30 AM  
brb...taking Bryson to camp. today is the last day!

SB Banks, Sonya 8/6/2021, 8:30 AM  
and they may forget their complete thought over the phone...they can proof read in a message. LOL  
👤 1 • George, Mary • Lehmann, Lauren

MG George, Mary 8/6/2021, 8:31 AM  
Sonya, why does it say you're outta office?

SB Banks, Sonya 8/6/2021, 8:31 AM  
because I had to switch a day and colleen never removed it from the calendar

MA Adamczyk, Monika 8/6/2021, 9:00 AM  
i need to hear this townhall if its about the vaccine

LL Lehmann, Lauren 8/6/2021, 9:00 AM  
It is

MA Adamczyk, Monika 8/6/2021, 9:00 AM  
are we jumping on the townhall?

MA Adamczyk, Monika 8/6/2021, 9:00 AM  
like its impriotant

LL Lehmann, Lauren 8/6/2021, 9:00 AM  
Kim said for us to be on it

MA Adamczyk, Monika 8/6/2021, 9:00 AM  
oh wait where did she say that

LL Lehmann, Lauren 8/6/2021, 9:01 AM  
In the HROps Team

MA Adamczyk, Monika 8/6/2021, 9:01 AM  
i just had a meeting with Bob Thomas about a holiday deferral question so i didnt see it

APP.508

MA Adamczyk, Monika 8/6/2021, 9:01 AM  
thanks!

MA Adamczyk, Monika 8/6/2021, 9:01 AM  
and ofcourse the phones arent off..

MG George, Mary 8/6/2021, 9:06 AM  
This dude is asking if we're gonna require passengers to be vaccinated lol

LL Lehmann, Lauren 8/6/2021, 9:10 AM  
and as soon as we do, we will ALL be unemploye!


LL Lehmann, Lauren 8/6/2021, 9:10 AM  
unemployed\*

LL Lehmann, Lauren 8/6/2021, 9:15 AM  
dumb.


LL Lehmann, Lauren 8/6/2021, 9:15 AM  
there's no need for us to be there!

LL Lehmann, Lauren 8/6/2021, 9:15 AM  
people are still getting COVID and walking all over Willis!

LL Lehmann, Lauren 8/6/2021, 9:15 AM  
hurry up Lori Lightfoot and let us stay home! File sent: 🍷

  
Image: ?.png (773 bytes)

MA Adamczyk, Monika 8/6/2021, 9:16 AM  
File sent: 😊

  
Image: ?.png (879 bytes)

MG George, Mary 8/6/2021, 9:20 AM  
Exactly! He even said, this would be huge for us lmao

MG George, Mary 8/6/2021, 9:20 AM  
Idk if he's being sarcastic or just stupid

MG George, Mary 8/6/2021, 9:21 AM  
Huge win\*

SB Banks, Sonya 8/6/2021, 9:31 AM  
I think we should we mentioned during all of this.

SB Banks, Sonya 8/6/2021, 9:31 AM  
Not HR but HR operations

LL Lehmann, Lauren 8/6/2021, 9:31 AM  
agreed

SB Banks, Sonya 8/6/2021, 9:32 AM

APP.509

and she mentioned EVERYONE but us

🙄 1 • Lehmann, Lauren

SB

Banks, Sonya

8/6/2021, 9:33 AM

I am going to bring that up to Colleen at the next briefing.

LL

Lehmann, Lauren

8/6/2021, 9:34 AM

The following fields have been provided:

Personal Email Address: john.johnson02@united.com

What is your inquiry?: The information states vaccines are required for, " All frontline U.S. employees, All M&A U.S. employees, including M&A employees with hybrid and remote work schedules." How do I tell if I am "frontline"? I do not work with the public.

SB

Banks, Sonya

8/6/2021, 9:35 AM

File sent: Screaming Dying Inside GIF (GIF Image)



Image: Screaming Dying Inside GIF (GIF Image).gif (820 KB)

SB

Banks, Sonya

8/6/2021, 9:36 AM

where do they work?

LL

Lehmann, Lauren

8/6/2021, 9:36 AM

Tech Ops

LL

Lehmann, Lauren

8/6/2021, 9:37 AM

but here is what the article says:

LL

Lehmann, Lauren

8/6/2021, 9:37 AM

This fall, every U.S.-based United employee will be required to receive a COVID-19 vaccine and upload their vaccination record to  
<u>Flying Together</u>.

LL

Lehmann, Lauren

8/6/2021, 9:37 AM

so whether frontline, M&A, NOC, IF, or Pilot, it is required

MA

Adamczyk, Monika

8/6/2021, 9:38 AM

what about pregnant employees...

MA

Adamczyk, Monika

8/6/2021, 9:38 AM

just got a call

LL

Lehmann, Lauren

8/6/2021, 9:39 AM

oh Lord.....idk

MA

Adamczyk, Monika

8/6/2021, 9:39 AM

she is 14 weeks pregnant and there havent been many studies about pregnant women getting the vaccine

**APP.510**



LL Lehmann, Lauren 8/6/2021, 9:39 AM  
they need a medical professional

MA Adamczyk, Monika 8/6/2021, 9:39 AM  
but they want to know what about her employment if she doesnt get it until after the baby comes. so after fenruary..

MA Adamczyk, Monika 8/6/2021, 9:39 AM  
so thats us...

MA Adamczyk, Monika 8/6/2021, 9:39 AM  
like how am i supposed to answer these....

MA Adamczyk, Monika 8/6/2021, 9:40 AM  
i am goin to send to kim

LL Lehmann, Lauren 8/6/2021, 9:40 AM  
see....put in that the COVID vaccine requirement group for Kim to review

MA Adamczyk, Monika 8/6/2021, 9:40 AM  
yes thanks

MA Adamczyk, Monika 8/6/2021, 9:40 AM  
but many more random calls like this to come...

MA Adamczyk, Monika 8/6/2021, 9:40 AM  
im sure

MA Adamczyk, Monika 8/6/2021, 9:40 AM  
today and next week will SUCK

LL Lehmann, Lauren 8/6/2021, 9:41 AM  
oh yeah, it's going to be fun! LOL!

LL Lehmann, Lauren 8/6/2021, 9:41 AM  
Was wondering if all of us that took the VSL and have uploaded there Covid -19 Vaccination Card, will be getting the Day pay as well, A lot of us were there in the beginning and and I left June 5th. I have gotten a few calls from people that have taken the VSL and were wondering as well. Thank You Steve Godwin PHXCG

LL Lehmann, Lauren 8/6/2021, 9:42 AM  
what?!?! you left!!!

SB Banks, Sonya 8/6/2021, 9:44 AM  
I have now transferred 3 calls to RAP about vaccination

LL Lehmann, Lauren 8/6/2021, 9:45 AM  
and guess what....the link in the article for "questions" comes through the COVID 19 Vaccine Tracking Inquiries.....

MG George, Mary 8/6/2021, 9:59 AM  
Pregnant women need to speak with RAP

MG George, Mary 8/6/2021, 9:59 AM  
What did you guys mean HR Ops weren't mentioned on the call?

SB Banks, Sonya 8/6/2021, 10:28 AM  
I heard benefits, HR partner, HR as a whole and in the fields...but not HR Operations specifically

LL Lehmann, Lauren 8/6/2021, 10:28 AM

APP.511



oh, and the RAP team

LL	Lehmann, Lauren	8/6/2021, 10:38 AM
	this FAQ is helpful....i am literally copy and pasting answers....we do not have time for this today.	
LL	Lehmann, Lauren	8/6/2021, 10:42 AM
	now Kim is in my case....	
MA	Adamczyk, Monika	8/6/2021, 11:06 AM
	What is your question?: Hello United Airlines HR Team. I just heard on the news that COVID-19 vaccine is required (mandated) for United employees. I need confirmation if this applies to me....I am currently on the VSL Program that will be ending in August 2022 (but I am not actually actively working per the VSL agreement). Does the COVID-19 vaccine requirement (mandate) for United employees apply to me if I am on the VSL Program?	
MA	Adamczyk, Monika	8/6/2021, 11:06 AM
	idk any of these questions lol	
MA	Adamczyk, Monika	8/6/2021, 11:06 AM
	im assuming no for this one	
LL	Lehmann, Lauren	8/6/2021, 11:07 AM
	VSL and VSP would be a no since they are not actively working	
LL	Lehmann, Lauren	8/6/2021, 11:07 AM
	i asked Kim and she thought no as well since they aren't working	
MA	Adamczyk, Monika	8/6/2021, 11:07 AM
	okay so no?	
LL	Lehmann, Lauren	8/6/2021, 11:07 AM
	i have been saying no	
MA	Adamczyk, Monika	8/6/2021, 11:09 AM
	as long as kim verified that	
MA	Adamczyk, Monika	8/6/2021, 11:09 AM
	so we dont get in trouble later	
LL	Lehmann, Lauren	8/6/2021, 11:09 AM
	i put it in the group she added us to	
LL	Lehmann, Lauren	8/6/2021, 11:10 AM
	i have already referred one person to their HRBP because "they are mad and want to seek legal action since they were vaccinated prior to this announcement"	
MA	Adamczyk, Monika	8/6/2021, 11:14 AM
	poor	
MA	Adamczyk, Monika	8/6/2021, 11:14 AM
	this is probably really upsetting to some	
MA	Adamczyk, Monika	8/6/2021, 11:14 AM
	bc its not a light decision to be made	
LL	Lehmann, Lauren	8/6/2021, 11:15 AM
	agreed	

APP.512

MA Adamczyk, Monika 8/6/2021, 11:15 AM  
and now t be forced to make the decision asap is hard

LL Lehmann, Lauren 8/6/2021, 11:16 AM  
yup

SB Banks, Sonya 8/6/2021, 11:19 AM  
File sent: lets go luna omg GIF by PBS KIDS (GIF Image)




Image: lets go luna omg GIF by PBS KIDS (GIF Image).gif (1 MB)

SB Banks, Sonya 8/6/2021, 11:19 AM  
I cannot find this cricket in my basement and these dogs next door will not stop barking.

LL Lehmann, Lauren 8/6/2021, 11:19 AM  
LOL!!!!

LL Lehmann, Lauren 8/6/2021, 11:20 AM  
have you followed the sound....and Raid or something?

SB Banks, Sonya 8/6/2021, 11:20 AM  
I just put a little container of syrup down where I think it may be....that attracts them.

LL Lehmann, Lauren 8/6/2021, 11:21 AM  
ooh! i didn't know that

MG George, Mary 8/6/2021, 11:36 AM  
Why would they be mad if they are already vaccinated? I'm confused

SB Banks, Sonya 8/6/2021, 12:06 PM  
What is your inquiry?: Since my doctor will not clear me for the vaccine and since you are now mandating it for employment, will my family be taken care of if I'm unable to work for a long period of time afterwards due to side effects and if I should die?

MA Adamczyk, Monika 8/6/2021, 12:33 PM  
oh wow...

SB Banks, Sonya 8/6/2021, 12:34 PM  
I am so done for the day...these people are getting ridiculous with their questions....  
  
What is your inquiry?: Can you please also require that anyone wanting to use free travel passes also be vaccinated? I don't think people who are not vaccinated should be flying on United aircraft for free on buddy passes or "enrolled friend" or family status if they are not fully vaccinated.

MA Adamczyk, Monika 8/6/2021, 12:37 PM  
i have 40+ cases from today ugh

LL Lehmann, Lauren 8/6/2021, 12:38 PM

APP.513

this is too much

MA Adamczyk, Monika 8/6/2021, 12:40 PM  
vsl was NOT considered a buyout right

LL Lehmann, Lauren 8/6/2021, 12:40 PM  
nope

MA Adamczyk, Monika 8/6/2021, 12:41 PM  
on monday we will have 500 cases each

MA Adamczyk, Monika 8/6/2021, 12:41 PM  
File sent: 😞



Image: ?.png (2 KB)

LL Lehmann, Lauren 8/6/2021, 12:41 PM  
we better not!!

LL Lehmann, Lauren 8/6/2021, 12:41 PM  
take it back! lol!!

MA Adamczyk, Monika 8/6/2021, 12:41 PM  
i got 40 just from vaccine stuff today....

SB Banks, Sonya 8/6/2021, 12:43 PM  
My head hurts:

What is your inquiry?: Previously I had both of my vaccination shots. I showed my vaccination card to my supervisor & I assumed my supervisor imputed them into the system to be documented on my records! But i'm not sure where to look & verify proof of any documentation.

LL Lehmann, Lauren 8/6/2021, 12:43 PM  
oh come on!

LL Lehmann, Lauren 8/6/2021, 12:58 PM  
AMSImage sent

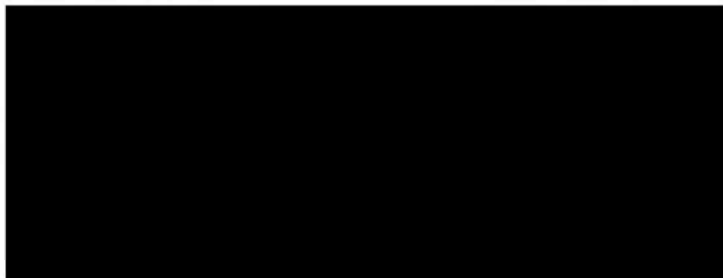


Image: 0-cus-d19-0eda42b1fbf9d9ec4803c4052dd478e7.png (54 KB)

LL Lehmann, Lauren 8/6/2021, 12:59 PM  
this lady said "You are NOT a doctor and you cannot make decisions for me. Is United taking full liability for any issues that come from the vaccine?"



MA Adamczyk, Monika 8/6/2021, 12:59 PM  
people will sue for sure

LL Lehmann, Lauren 8/6/2021, 12:59 PM  
let me tell you something....I DO NOT CARE whether you get vaccinated or not. Get termed for all I care.

MA Adamczyk, Monika 8/6/2021, 12:59 PM  
i just hate that we have to deal with their questions

LL Lehmann, Lauren 8/6/2021, 1:00 PM  
United is a private company just like Google and Facebook and can impose any rules they want.

LL Lehmann, Lauren 8/6/2021, 1:00 PM  
these people clearly don't understand Business, Law or anything else. lol!

MA Adamczyk, Monika 8/6/2021, 1:00 PM  
i do not think they should be making medical decision for anyone even if it is private but thats just my opinion

MA Adamczyk, Monika 8/6/2021, 1:00 PM  
but obviously others share it too

LL Lehmann, Lauren 8/6/2021, 1:01 PM  
this is a mess that we should not be involved in.

SB Banks, Sonya 8/6/2021, 1:01 PM  
File sent: Over It I Give Up GIF by Dreezy (GIF Image)



Image: Over It I Give Up GIF by Dreezy (GIF Image).gif (833 KB)

MA Adamczyk, Monika 8/6/2021, 1:01 PM  
we should not be involved

SB Banks, Sonya 8/6/2021, 1:01 PM  
Especially now since we are not as big as before

LL Lehmann, Lauren 8/6/2021, 1:02 PM  
absolutely.

MA Adamczyk, Monika 8/6/2021, 1:02 PM  
sonya can you look at HRC3588483

MA Adamczyk, Monika 8/6/2021, 1:03 PM  
this is i regards to a case that you sent her some pay info but in your case: HRC3585548

MA Adamczyk, Monika 8/6/2021, 1:03 PM  
and she is saying this is not being accepted so where does this new case get sent to now?

APP.515



MA Adamczyk, Monika  
payroll?

8/6/2021, 1:03 PM

SB Banks, Sonya  
File sent: Hillary Clinton No GIF (GIF Image)

8/6/2021, 1:04 PM



Image: Hillary Clinton No GIF (GIF Image).gif (1 MB)

SB Banks, Sonya  
We Are not making any changes to that letter.

8/6/2021, 1:04 PM

SB Banks, Sonya  
we did not create that letter

8/6/2021, 1:04 PM

SB Banks, Sonya  
she needs to reach out to her management

8/6/2021, 1:04 PM

SB Banks, Sonya  
I didnt have to give her that one...she could have found that on her own

8/6/2021, 1:05 PM

MA Adamczyk, Monika  
im telling the ee what you said

8/6/2021, 1:15 PM

MA Adamczyk, Monika  
and closing

8/6/2021, 1:15 PM

MA Adamczyk, Monika  
telling her to go to her management if that letter isnt good enough

8/6/2021, 1:15 PM

MA Adamczyk, Monika  
right?

8/6/2021, 1:15 PM

SB Banks, Sonya  
I hate this:  
What is your inquiry?: Since United is making the vaccine mandatory and you cannot sue the pharmaceutical companies that manufacture the vaccine if you have side effects is United Airlines liable if I suffer side effects. My wife was vaccinated months ago and still is experiencing side effects to this day.

8/6/2021, 1:15 PM

SB Banks, Sonya  
Correct Monika

8/6/2021, 1:16 PM

SB Banks, Sonya  
I am putting all of these in Kims new chat

8/6/2021, 1:16 PM

**APP.516**

LL Lehmann, Lauren

8/6/2021, 1:17 PM

File sent: Seth Meyers Question GIF by Late Night with Seth Meyers (GIF Image)



Image: Seth Meyers Question GIF by Late Night with Seth Meyers (GIF Image).gif (1 MB)

LL Lehmann, Lauren

8/6/2021, 1:18 PM

&lt;ol&gt;

Did your wife have other medical issues?

Did she recently get over COVID and try to get vaccinated right away?

What makes you think you have money to afford suing Big Pharma?

&lt;/ol&gt;

SB Banks, Sonya

8/6/2021, 1:18 PM

You want me to reassign you so can ask??

SB Banks, Sonya

8/6/2021, 1:18 PM

lol

LL Lehmann, Lauren

8/6/2021, 1:19 PM

lol! i just want to ask basic questions to these ee's WITHOUT getting fired!

LL Lehmann, Lauren

8/6/2021, 1:19 PM

cause some of the things these people are saying it quite astounding.

LL Lehmann, Lauren

8/6/2021, 1:20 PM

and now every case I have is asking for religious exemption.....i have a major problem with that

MA Adamczyk, Monika

8/6/2021, 1:22 PM

i cant hear

MA Adamczyk, Monika

8/6/2021, 1:22 PM

my audio is gone...

LL Lehmann, Lauren

8/6/2021, 1:22 PM

oh no!


APP.517

MA Adamczyk, Monika 8/6/2021, 1:23 PM  
my headphones arent working

MA Adamczyk, Monika 8/6/2021, 1:23 PM  
hmmm

MA Adamczyk, Monika 8/6/2021, 1:23 PM  
speaker is now tho


LL Lehmann, Lauren 8/6/2021, 1:41 PM  
sooo hypothetically speaking.....if enough people say "im not getting it" and quit of get fired, do we think we will have a better chance of boarding flights and stuff? File sent: 😊

  
Image: ? .png (653 bytes)

MG George, Mary 8/6/2021, 1:41 PM  
Lol

MG George, Mary 8/6/2021, 1:42 PM  
The more the merrier

SB Banks, Sonya 8/6/2021, 1:42 PM  
File sent: sandra bullock the blindside GIF (GIF Image)

  
Image: sandra bullock the blindside GIF (GIF Image).gif (614 KB)

LL Lehmann, Lauren 8/6/2021, 1:42 PM  
girl, i am SO serious!!

MG George, Mary 8/6/2021, 1:42 PM  
It's kinda crazy that United did this right now when they are struggling in hiring people

MG George, Mary 8/6/2021, 1:42 PM  
Not a good decision in my opinion

SB Banks, Sonya 8/6/2021, 1:42 PM  
I dont want us to be like Spirit in November

MG George, Mary 8/6/2021, 1:43 PM  
We will be

LL Lehmann, Lauren 8/6/2021, 1:43 PM  
i don't think they would let us get that bad

LL Lehmann, Lauren 8/6/2021, 1:43 PM  
i mean, all the passengers on the big 3 are having issues

APP.518



MG George, Mary 8/6/2021, 1:43 PM  
People won't get it, get fired, now we'll have that many more positions to fill, plus the added law suits...they probably won't win but still a lot of money will be going out the door

LL Lehmann, Lauren 8/6/2021, 1:44 PM  
i don't see how they are going to sue though, unless they aren't accommodated for RAP.

MG George, Mary 8/6/2021, 1:44 PM  
They will try

MG George, Mary 8/6/2021, 1:44 PM  
Like the ones saying they're getting sick from it blah blah

MG George, Mary 8/6/2021, 1:45 PM  
They will say they were forced and cause of it, they are sick

LL Lehmann, Lauren 8/6/2021, 1:45 PM  
LOL!

MG George, Mary 8/6/2021, 1:45 PM  
Also lots of unemployment claims

MG George, Mary 8/6/2021, 1:45 PM  
You know people will try anything

LL Lehmann, Lauren 8/6/2021, 1:46 PM  
but technically, we aren't "forcing you"...we're requiring it if you want to work here....and if you don't want it, you can work elsewhere lol!

MG George, Mary 8/6/2021, 1:46 PM  
I just don't think it was the right time. They could've waited til we were properly staffed

MA Adamczyk, Monika 8/6/2021, 1:46 PM  
its still shitty

LL Lehmann, Lauren 8/6/2021, 1:46 PM  
at the rate we're going to ranstad, idk when the best time would be cause they can't get the hiring thing together

MA Adamczyk, Monika 8/6/2021, 1:46 PM  
bc they feel forced or else they might not be able to pay their bills if they cant find another job right away

MA Adamczyk, Monika 8/6/2021, 1:47 PM  
idk man

MA Adamczyk, Monika 8/6/2021, 1:47 PM  
lot of pressure

LL Lehmann, Lauren 8/6/2021, 1:48 PM  
yeah, it's definitely going to weed people out and cause an exodus to happen

MG George, Mary 8/6/2021, 1:54 PM  
What's the full number to badging? I only have the 55364

MG George, Mary 8/6/2021, 1:54 PM  
I tried 877-825-5364 but I don't think that's sit

SB Banks, Sonya 8/6/2021, 2:04 PM

APP.519



What is your question?: Was wondering if all of us that took the VSL and have uploaded there Covid -19 Vaccination Card, will be getting the Day pay as well, A lot of us were there in the beginning and and I left June 5th. I have gotten a few calls from people that have taken the VSL and were wondering as well. Thank You Steve Godwin PHXCG

SB Banks, Sonya 8/6/2021, 2:04 PM  
Badging does not have a number I believe

LL Lehmann, Lauren 8/6/2021, 2:05 PM  
i had a case from him earlier

LL Lehmann, Lauren 8/6/2021, 2:06 PM  
i told him no, they won't get it because the FAQ states that you have to be an active employee by the time they give the day of pay out

MG George, Mary 8/6/2021, 2:06 PM  
They are already being paid without working!!

MG George, Mary 8/6/2021, 2:06 PM  
Geez

LL Lehmann, Lauren 8/6/2021, 2:06 PM  
thank you!

MG George, Mary 8/6/2021, 2:06 PM  
People are so damn greedy

LL Lehmann, Lauren 8/6/2021, 2:07 PM  
very!

SB Banks, Sonya 8/6/2021, 2:07 PM  
guess where I am adding this??

SB Banks, Sonya 8/6/2021, 2:07 PM  
lol

LL Lehmann, Lauren 8/6/2021, 2:07 PM  
lol! you can send him the response I sent him too

SB Banks, Sonya 8/6/2021, 2:07 PM  
HEY!!!!

SB Banks, Sonya 8/6/2021, 2:08 PM  
Where does it state that in the FAQ

SB Banks, Sonya 8/6/2021, 2:08 PM  
I was looking for that

LL Lehmann, Lauren 8/6/2021, 2:08 PM  
You will need to be an active employee on the payment date to receive the incentive. Employees on leave will need to have their vaccine information uploaded by Sept. 20, 2021, and will be paid within 45 days of returning from leave.

SB Banks, Sonya 8/6/2021, 2:09 PM  
Not what I am looking for. A VSL employee wanted to make sure they did not have to do it or lose their benefits

LL Lehmann, Lauren 8/6/2021, 2:09 PM  
oh!

LL Lehmann, Lauren 8/6/2021, 2:09 PM  
that's not there because it's not required for them to upload it

SB Banks, Sonya 8/6/2021, 2:09 PM  
Jessica is going to add it...because they want to see it in writing

LL Lehmann, Lauren 8/6/2021, 2:09 PM  
that's been since we first got the upload tool

LL Lehmann, Lauren 8/6/2021, 2:09 PM  
good deal!

SB Banks, Sonya 8/6/2021, 2:10 PM  
Again...OVER IT

LL Lehmann, Lauren 8/6/2021, 2:10 PM  
is this FAQ visible to them?!?!?

SB Banks, Sonya 8/6/2021, 2:10 PM  
yes

MG George, Mary 8/6/2021, 2:13 PM  
It also needs to say actively working, not active

MG George, Mary 8/6/2021, 2:13 PM  
Cause VSL employees are technically active

LL Lehmann, Lauren 8/6/2021, 2:13 PM  
clean up these loopholes! lol!

MG George, Mary 8/6/2021, 2:14 PM  
Or it should just say VSL not eligible like it says it for pilots and fan's

MG George, Mary 8/6/2021, 2:14 PM  
Fa's

SB Banks, Sonya 8/6/2021, 2:41 PM  
I just talked to good ol Abe Lincoln

LL Lehmann, Lauren 8/6/2021, 3:34 PM  
what did he want

MA Adamczyk, Monika 8/6/2021, 3:38 PM  
how was our good ole abe doing

MA Adamczyk, Monika 8/6/2021, 3:41 PM  
What is your inquiry?: Are Scott and Brett not concerned what the CDC VAERS data is telling us about the "Jab"?  
Granted the CDC states that there is a low reporting rate of as low as 1-10% meaning these figures can be as low as  
ten times higher. As of July 16 2021 they're own data shows 11,405 deaths! At what point would you stop any treatment  
with that kind of figure! Hospitalizations 36,000 and 11,221 disabled. Heart Attack 4, 381, Bells Palsy 3,313.  
European equivalent for only 20 counties is twice this.

Seriously I can't believe your not telling us this.! I watched all the interviews, none of this was mentioned.

Are you going to bring this up at the town halls?

LL Lehmann, Lauren 8/6/2021, 3:43 PM  
ha! I had that case too

MA Adamczyk, Monika 8/6/2021, 3:44 PM  
what did u say

MA Adamczyk, Monika 8/6/2021, 3:45 PM  
omg is this true...

LL Lehmann, Lauren 8/6/2021, 3:48 PM  
i have no idea if that's true....

MA Adamczyk, Monika 8/6/2021, 3:50 PM  
i wouldnt be surprised, i did hear of bad vaccine complications in men either india or a country in europe. cant remember

SB Banks, Sonya 8/6/2021, 3:52 PM  
What is your inquiry?: Can a female employee get an exemption for covid vaccine if she is trying to get pregnant?

MA Adamczyk, Monika 8/6/2021, 3:53 PM  
yeah... also heard about complications it may cause for fertility blahhh

MA Adamczyk, Monika 8/6/2021, 3:53 PM  
who knows

MA Adamczyk, Monika 8/6/2021, 3:53 PM  
send to Rap

LL Lehmann, Lauren 8/6/2021, 3:53 PM  
well, I can say that after I got the 1st shot, I didn't get a period for 3mths and then it came

MA Adamczyk, Monika 8/6/2021, 3:54 PM  
omg....

MA Adamczyk, Monika 8/6/2021, 3:54 PM  
thats scary

SB Banks, Sonya 8/6/2021, 3:55 PM  
I hate when I get HH cases from people that I actually know. LOL

LL Lehmann, Lauren 8/6/2021, 3:57 PM  
but here's the thing....i have PCOS and had a small cancerous cyst when I was 18 and I have always had irregular periods so i just assumed it was that and i went to the gyne to have them check and she said that several patients came in after the shot with the same side effect.

MA Adamczyk, Monika 8/6/2021, 3:57 PM  
ughhhh

SB Banks, Sonya 8/6/2021, 3:58 PM  
What is your inquiry?: I had COVID in November of 2020. I have the antibodies. I have given blood 4 times in 2021 and have been told by the blood bank that my antibodies are high. I was sent a post card from the blood bank that I was able to help 17 people with my donations. My doctor told me that my antibodies are stronger then the vaccine because the vaccine is only made to fight 2 or 3 COVID strains where my bodies natural antibodies fight all 7 strains of COVID. My doctor also told me if I get the vaccine it will stop my body from making the natural antibodies. I will have to get the shot because I need this job for my family. I just don't understand why nobody is talking about this part of the herd immunity.

LL Lehmann, Lauren 8/6/2021, 3:59 PM

APP.522



Sir/Ma'am.....you're in the control group. Antibodies do not last forever. Again, you do NOT have to get the vaccine....you just cannot work for United.

LL Lehmann, Lauren 8/6/2021, 3:59 PM  
also, there are definitely way more than 7 strains of COVID.

LL Lehmann, Lauren 8/6/2021, 4:00 PM  
you're Dr should probably go back to med school too. lol!

LL Lehmann, Lauren 8/6/2021, 4:00 PM  
your\*

SB Banks, Sonya 8/6/2021, 4:04 PM  
I have about 7 or 8 cases like this I am waiting until we are in the office to get answered

LL Lehmann, Lauren 8/6/2021, 4:05 PM  
yeah, I posted the ones in the other teams group, but idk if they are going to add a Legal person in there to give formal answers.

MA Adamczyk, Monika 8/6/2021, 4:06 PM  
What is your question?: Will employees on leaves still be required to get the COVID 19 vaccine by Oct 25? In the instance of maternity leave, a FA is not active.

MA Adamczyk, Monika 8/6/2021, 4:06 PM  
did we answer this already?

SB Banks, Sonya 8/6/2021, 4:07 PM  
I have 2 of those

LL Lehmann, Lauren 8/6/2021, 4:07 PM  
idk if we did answer those

MA Adamczyk, Monika 8/6/2021, 4:07 PM  
should we send to absence? or wait

MA Adamczyk, Monika 8/6/2021, 4:07 PM  
they mentioned maternity leave which i thought was absence

SB Banks, Sonya 8/6/2021, 4:07 PM  
that doesnt make sense, but its not like you dont have access to update it

SB Banks, Sonya 8/6/2021, 4:08 PM  
oh wait ...does it impact breastfeeding?

LL Lehmann, Lauren 8/6/2021, 4:08 PM  
aw, see Sonya, we don't have all those answers now! lol!

LL Lehmann, Lauren 8/6/2021, 4:10 PM  
File sent: Leaving Go Home GIF by VH1 (GIF Image)





Image: Leaving Go Home GIF by VH1 (GIF Image).gif (1 MB)

SB Banks, Sonya 8/6/2021, 4:10 PM  
You are home

LL Lehmann, Lauren 8/6/2021, 4:10 PM  
LOL!!!!!!!!!! you know what I meant!!!!!!!!!!

LL Lehmann, Lauren 8/6/2021, 4:10 PM  
File sent: 😄



Image: ?.png (2 KB)

SB Banks, Sonya 8/6/2021, 4:11 PM  
File sent: Go Go Go Running GIF (GIF Image)  
Me at 4: 30

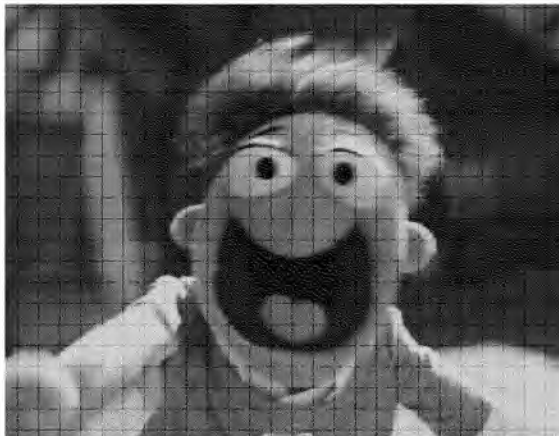


Image: Go Go Go Running GIF (GIF Image).gif (966 KB)

LL Lehmann, Lauren 8/6/2021, 4:11 PM  
yes!!!!

LL Lehmann, Lauren 8/6/2021, 4:15 PM  
Bryson is laughing way too hard at your GIF Sonya!

SB Banks, Sonya 8/6/2021, 4:30 PM  
File sent: Friday Reaction GIF (GIF Image)  
have a good weekend



Image: Friday Reaction GIF (GIF Image).gif (1 MB)

LL	Lehmann, Lauren have a good weekend!	8/6/2021, 4:30 PM
MA	Adamczyk, Monika hahaha	8/6/2021, 4:31 PM
MA	Adamczyk, Monika have a good weekend!	8/6/2021, 4:31 PM
MG	George, Mary Have a good weekend everyone	8/6/2021, 4:35 PM
LL	Lehmann, Lauren have a good weekend!	8/6/2021, 4:36 PM

# **EXHIBIT 99**

## Short Message Report

Conversations: 1	Participants: 2
Total Messages: 223	Date Range: 9/1/2021


### Outline of Conversations



**Microsoft Teams chat between [Catanzano, Jessica, Cooney, Julianne]** • 223 messages on 9/1/2021 • Catanzano, Jessica • Cooney, Julianne



Messages in chronological order (times are shown in GMT -05:00)

 **Microsoft Teams chat between [Catanzano, Jessica, Cooney, Julianne]**

JC Catanzano, Jessica 9/1/2021, 5:10 PM  
Hey - did you run this by your team - the last day to retire unless you have a RAP is 9/26 with it starting 9/27?

JC Cooney, Julianne 9/1/2021, 5:11 PM  
Yes, we are good but I think it would start 9/28 versus 9/27, yes? Is the Leadership good with that?

JC Catanzano, Jessica 9/1/2021, 5:14 PM  
let me ask, kirk had said "On or before 9/27" connie thought it should be 9/26 with start date 9/27

JC Cooney, Julianne 9/1/2021, 9:51 PM  
Looks like everything is changing...

JC Catanzano, Jessica 9/1/2021, 9:52 PM  
Yep. Kirk tried to make it sound less scary.

JC Catanzano, Jessica 9/1/2021, 9:53 PM  
It's more scary

JC Catanzano, Jessica 9/1/2021, 9:53 PM  
ETeam is reviewing again at 8am

JC Cooney, Julianne 9/1/2021, 9:53 PM  
Sounds much more complicated.

JC Catanzano, Jessica 9/1/2021, 9:53 PM  
You're talking about the raps right?

JC Catanzano, Jessica 9/1/2021, 9:53 PM  
I mean I assume but who knows

JC Cooney, Julianne 9/1/2021, 9:54 PM  
Yes. Are we honestly thinking of separating work groups by front-line versus non-front-line? Not sure how that will work at all.

JC Cooney, Julianne 9/1/2021, 9:54 PM  
What do we do with the ramp employee that has to push the occasional wheel chair in a line station - or pick up bags in the gate area?

JC Catanzano, Jessica 9/1/2021, 9:54 PM  
No kidding

JC Catanzano, Jessica 9/1/2021, 9:55 PM  
Also. Administratively...

JC Catanzano, Jessica 9/1/2021, 9:55 PM  
And optically

JC Cooney, Julianne 9/1/2021, 9:55 PM  
To me that just has disaster written all over it.

**APP.528**

JC Catanzano, Jessica 9/1/2021, 9:55 PM  
And did I mention administratively yet?

JC Cooney, Julianne 9/1/2021, 9:55 PM  
You did, several times. LOL

JC Catanzano, Jessica 9/1/2021, 9:55 PM  
Ok just checking

JC Cooney, Julianne 9/1/2021, 9:55 PM  
Did I mention I'm on vacation 9/7 - 9/18?

JC Cooney, Julianne 9/1/2021, 9:56 PM  
My first vacation since Covid

JC Catanzano, Jessica 9/1/2021, 9:56 PM  
Lolololol

JC Cooney, Julianne 9/1/2021, 9:56 PM  
So.... good luck with everything.

JC Catanzano, Jessica 9/1/2021, 9:56 PM  
Gee whiz. Thanks

JC Cooney, Julianne 9/1/2021, 9:57 PM  
And to make matters worse, my group is regroup tomorrow am to discuss the medical leaves. Turns out pilots do not use their sick leave bank but go straight to leave. IAM must use sick leave bank prior to going on an illness leave. IBT can choose to use sick leave bank or go straight to illness leave. I lost track of AFA.

JC Catanzano, Jessica 9/1/2021, 9:58 PM  
Oh I know.

JC Catanzano, Jessica 9/1/2021, 9:58 PM  
Because I have all of that in those knowledge blocks

JC Catanzano, Jessica 9/1/2021, 9:58 PM  
That no one wants to read

JC Catanzano, Jessica 9/1/2021, 9:58 PM  
Also, those who go on sick time have to stay Adobe

JC Cooney, Julianne 9/1/2021, 9:58 PM  
I want to read, but I have to review the Catering RIF documents first.

JC Catanzano, Jessica 9/1/2021, 9:58 PM  
Active

JC Catanzano, Jessica 9/1/2021, 9:58 PM  
How do we do that?

JC Cooney, Julianne 9/1/2021, 9:59 PM  
Right - those with sick time remain active.

JC Catanzano, Jessica 9/1/2021, 9:59 PM  
Who enters their sick time?

JC Cooney, Julianne 9/1/2021, 9:59 PM

APP.529

For IAM and IBT, the station will enter sick time of 40 hours per week (or whatever the part-time schedule is) until they run out of sick leave and have to go on EIS.

JC Catanzano, Jessica 9/1/2021, 9:59 PM  
Let me know the outcome of that because it all has to be in those knowledge clocks

JC Catanzano, Jessica 9/1/2021, 10:00 PM  
Blocks

JC Cooney, Julianne 9/1/2021, 10:00 PM  
But is this even what we are still doing?

JC Catanzano, Jessica 9/1/2021, 10:00 PM  
Ok well that seems kinda easy

JC Catanzano, Jessica 9/1/2021, 10:02 PM  
I'm not ~~too~~ sure we're still talking about sick time first

JC Catanzano, Jessica 9/1/2021, 10:02 PM  
I have an email from Kirk to the eTeam. It doesn't acknowledge sick time

JC Catanzano, Jessica 9/1/2021, 10:02 PM  
But that doesn't mean anything

JC Catanzano, Jessica 9/1/2021, 10:02 PM  
Sometimes for eTeam things get oversimplified

JC Cooney, Julianne 9/1/2021, 10:03 PM  
I'm still talking about sick leave. Where we left it is all medical RAP use sick bank/illness leave and religious RAP get personal leaves. But now we are hearing that we may split the employee groups up.

JC Catanzano, Jessica 9/1/2021, 10:04 PM  
Oh yes that I know

JC Cooney, Julianne 9/1/2021, 10:04 PM  
So I think my group feels like we are not sure what is going on. LOL

JC Catanzano, Jessica 9/1/2021, 10:05 PM  
I'm getting briefed after the 8am eTeam

JC Cooney, Julianne 9/1/2021, 10:05 PM  
OK, we will wait to hear

JC Catanzano, Jessica 9/1/2021, 10:06 PM  
I'm telling you this grid doesn't mention sick time. But again, could be oversimplification

JC Catanzano, Jessica 9/1/2021, 10:06 PM  
When I say "I" there's more than just me

JC Cooney, Julianne 9/1/2021, 10:06 PM  
But the sick time is a huge piece of the rap.

JC Catanzano, Jessica 9/1/2021, 10:06 PM  
I'll ask who's updating LR



JC Catanzano, Jessica 9/1/2021, 10:06 PM  
No kidding

JC Cooney, Julianne 9/1/2021, 10:08 PM  
I'm not sure because Zach is leaving for Italy late tomorrow. I think he is working tomorrow until about 3, so I'm assuming Zach

JC Catanzano, Jessica 9/1/2021, 10:09 PM  
If it makes you feel better, the only people Kirk officially briefed today were Dan, Neil and Vania. Well, Vania was already there

JC Catanzano, Jessica 9/1/2021, 10:10 PM  
I have an email. But you know it'll change again

JC Cooney, Julianne 9/1/2021, 10:10 PM  
I'm not sure what there was to brief on - sounds like some decisions still need to be made.

JC Catanzano, Jessica 9/1/2021, 10:10 PM  
They spent time plotting out the groups and how it would work religious and medical

JC Catanzano, Jessica 9/1/2021, 10:11 PM  
Meanwhile the partners are going to eat us alive with term questions

JC Cooney, Julianne 9/1/2021, 10:11 PM  
We have to still brief the unions on the RAP process

JC Catanzano, Jessica 9/1/2021, 10:11 PM  
And Kim keeps telling me to keep her in the loop and I'm like- we don't know everything yet!

JC Catanzano, Jessica 9/1/2021, 10:11 PM  
We have basic outlines of things

JC Cooney, Julianne 9/1/2021, 10:11 PM  
No, it definitely sounds like there is still quite a bit of sausage making left to be done

JC Catanzano, Jessica 9/1/2021, 10:12 PM  
Yes!!

JC Cooney, Julianne 9/1/2021, 10:12 PM  
So do you honestly think we are going to separate out workgroups?

JC Catanzano, Jessica 9/1/2021, 10:12 PM  
And I told her that the sausage is still raw meat but as soon as we get through this rap stuff we will get it all put together with her help

JC Catanzano, Jessica 9/1/2021, 10:13 PM  
It looks like it?!?

JC Catanzano, Jessica 9/1/2021, 10:13 PM  
Which is insanity

JC Cooney, Julianne 9/1/2021, 10:13 PM  
Insanity

JC Catanzano, Jessica 9/1/2021, 10:13 PM  
I wish Zach would say that

APP.531



JC Cooney, Julianne 9/1/2021, 10:13 PM  
So do the decision makers understand that often ramp service and technicians face customers?

JC Cooney, Julianne 9/1/2021, 10:14 PM  
Ramp for sure

JC Catanzano, Jessica 9/1/2021, 10:14 PM  
I've chatted with a ramp guy before!

JC Cooney, Julianne 9/1/2021, 10:14 PM  
How many times have you seen the ramp go up and down the stairs to load extra bags on the jet bridge while passengers are boarding a plane???

JC Catanzano, Jessica 9/1/2021, 10:14 PM  
More than once

JC Catanzano, Jessica 9/1/2021, 10:15 PM  
Basically every flight

JC Cooney, Julianne 9/1/2021, 10:15 PM  
Exactly

JC Catanzano, Jessica 9/1/2021, 10:15 PM  
Sometimes I chat with them about crappy weather

JC Cooney, Julianne 9/1/2021, 10:15 PM  
So all ramp need to be included in front-facing

JC Catanzano, Jessica 9/1/2021, 10:15 PM  
They stand in the vestibule

JC Catanzano, Jessica 9/1/2021, 10:15 PM  
And roll their eyes at all of us and our bags

JC Cooney, Julianne 9/1/2021, 10:15 PM  
How many times have you seen technicians in the airport? What about the facilities techs - when they have to fix something?

JC Catanzano, Jessica 9/1/2021, 10:16 PM  
Facilities techs!

JC Catanzano, Jessica 9/1/2021, 10:16 PM  
Good point!

JC Cooney, Julianne 9/1/2021, 10:16 PM  
Are we going to tell technicians they can't go to McDonalds for lunch in our terminals because all of the customers will see them?

JC Cooney, Julianne 9/1/2021, 10:16 PM  
Really, I'm thinking the only group excluded is Res.

JC Catanzano, Jessica 9/1/2021, 10:17 PM  
You realize if we ask this the answer will be "80/20 rule"

JC Catanzano, Jessica 9/1/2021, 10:17 PM  
But I agree. Res is different

JC Cooney, Julianne 9/1/2021, 10:17 PM  
Sounds then like the leadership is softening a bit then.

JC Cooney, Julianne 9/1/2021, 10:18 PM  
So for those who are considered not customer facing, we are going to make them take a weekly test and wear a mask and where a dot on their badge? I'm laughing as I'm typing this.

JC Cooney, Julianne 9/1/2021, 10:18 PM  
wear\*

JC Catanzano, Jessica 9/1/2021, 10:19 PM  
LoI yes

JC Catanzano, Jessica 9/1/2021, 10:19 PM  
Literally

JC Cooney, Julianne 9/1/2021, 10:19 PM  
I'm also too tired to type - obviously.

JC Catanzano, Jessica 9/1/2021, 10:19 PM  
It's like the scarlet letter

JC Cooney, Julianne 9/1/2021, 10:19 PM  
Oh my goodness. Who are we???

JC Catanzano, Jessica 9/1/2021, 10:19 PM  
I think it should be a big "C" for Covid

JC Catanzano, Jessica 9/1/2021, 10:19 PM  
Or "u" for unvaccinated

JC Cooney, Julianne 9/1/2021, 10:20 PM  
I think we should have them all wear a sign on their forehead that says "I'm not vaccinated."

JC Catanzano, Jessica 9/1/2021, 10:20 PM  
And we should all point when they walk by

JC Cooney, Julianne 9/1/2021, 10:20 PM  
LOLOLOLOLOL - That's about it.

JC Cooney, Julianne 9/1/2021, 10:20 PM  
Well, who knows what tomorrow will bring.

JC Cooney, Julianne 9/1/2021, 10:20 PM  
Hopefully some sense.

JC Catanzano, Jessica 9/1/2021, 10:22 PM  
I wish I could explain to the partners who are all riled up about termination what the heck is going on with rap

JC Cooney, Julianne 9/1/2021, 10:22 PM  
Oh, and I asked the question again about retirement to my group. Anyone that wants a guarantee of retirement should retire by 9/27, or whatever the date is, maybe 9/26. But, they want to have some room to make decisions based on unique circumstances after those dates.

JC Cooney, Julianne 9/1/2021, 10:22 PM  
Maybe let them retire with a release.

JC Catanzano, Jessica 9/1/2021, 10:22 PM  
Yes we had talked about that.

JC Catanzano, Jessica 9/1/2021, 10:23 PM  
Like a retire in lieu

JC Cooney, Julianne 9/1/2021, 10:23 PM  
Yes, a retire in lieu

JC Catanzano, Jessica 9/1/2021, 10:23 PM  
But if they want a vol retirement 9/27 or 9/26

JC Cooney, Julianne 9/1/2021, 10:23 PM  
Correct.

JC Catanzano, Jessica 9/1/2021, 10:23 PM  
I would love to get that cleared up tomorrow

JC Catanzano, Jessica 9/1/2021, 10:24 PM  
Connie thought 9/26. I asked.

JC Catanzano, Jessica 9/1/2021, 10:24 PM  
I want to be able to answer that one ASAP because it gets some people some answers

JC Cooney, Julianne 9/1/2021, 10:24 PM  
My groups will discuss. We have a meeting from 9 - 10.

JC Catanzano, Jessica 9/1/2021, 10:25 PM  
Ok. I also feed it up to Kirk and Michelle. I think you're right. 9/27

JC Cooney, Julianne 9/1/2021, 10:25 PM  
Just seems like employees will work on 9/26 and retire 9/27. Employees can't work and retire on the same day.

JC Cooney, Julianne 9/1/2021, 10:26 PM  
We have been telling the unions that if employees want a guaranteed retirement with no problem, they need to retire by 9/27.

JC Catanzano, Jessica 9/1/2021, 10:26 PM  
"By"

JC Catanzano, Jessica 9/1/2021, 10:27 PM  
I'd like to nail down which is the absolute last day worked

JC Catanzano, Jessica 9/1/2021, 10:27 PM  
Let me see what comes back to me

JC Cooney, Julianne 9/1/2021, 10:28 PM  
Sounds good. All vaccination records must be uploaded by 11:59 on 9/26, correct?

JC Catanzano, Jessica 9/1/2021, 10:28 PM  
11:59:59 9/27

JC Cooney, Julianne 9/1/2021, 10:29 PM  
So employees will work on 9/27, seems like the retirement date should be 9/28. Do you agree?

JC Catanzano, Jessica 9/1/2021, 10:29 PM  
Yes

APP.534



JC	Catanzano, Jessica I do	9/1/2021, 10:29 PM
JC	Catanzano, Jessica 23:59:59 is more clear. On 9/27,	9/1/2021, 10:30 PM
JC	Cooney, Julianne I agree - it is more clear	9/1/2021, 10:30 PM
JC	Catanzano, Jessica The 27 vs 28 for retirement date is what I sent to Kirk and Michelle for input. Copied Kim.	9/1/2021, 10:31 PM
JC	Catanzano, Jessica At least I think I copied Kim	9/1/2021, 10:31 PM
JC	Catanzano, Jessica Anyway that will help solve problems.	9/1/2021, 10:32 PM
JC	Cooney, Julianne Sounds good.	9/1/2021, 10:32 PM
JC	Catanzano, Jessica Did you know there's already a cop vol code out there?	9/1/2021, 10:32 PM
JC	Catanzano, Jessica Ugh. Vol code	9/1/2021, 10:32 PM
JC	Catanzano, Jessica And Kim created a retirement one too	9/1/2021, 10:32 PM
JC	Cooney, Julianne What is Vol?	9/1/2021, 10:32 PM
JC	Catanzano, Jessica Voluntary	9/1/2021, 10:32 PM
JC	Cooney, Julianne But voluntary what?	9/1/2021, 10:32 PM
JC	Cooney, Julianne We have several voluntary codes	9/1/2021, 10:33 PM
JC	Catanzano, Jessica Let me try again.	9/1/2021, 10:33 PM
JC	Catanzano, Jessica There's a new voluntary code for people who want to quit due to the policy	9/1/2021, 10:33 PM
JC	Catanzano, Jessica And a new requirement code for the same	9/1/2021, 10:33 PM
JC	Catanzano, Jessica So we can track	9/1/2021, 10:34 PM
JC	Cooney, Julianne	9/1/2021, 10:34 PM

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Oh that's good.

JC	Catanzano, Jessica	9/1/2021, 10:34 PM
	Let me reiterate I wanted to work on this with you, Kim, Tracey etc this week but instead it's been all rap	
JC	Catanzano, Jessica	9/1/2021, 10:34 PM
	You being all of labor	
JC	Cooney, Julianne	9/1/2021, 10:34 PM
	totally understand	
JC	Catanzano, Jessica	9/1/2021, 10:35 PM
	<b>Redacted - Privileged</b>	
JC	Catanzano, Jessica	9/1/2021, 10:35 PM
	Processes	
JC	Cooney, Julianne	9/1/2021, 10:35 PM
	And I feel like I'm going on Vac at the worst time between this vaccine stuff and Catering.	
JC	Catanzano, Jessica	9/1/2021, 10:35 PM
	What has the world come to?	
JC	Cooney, Julianne	9/1/2021, 10:35 PM
	What has the world come to	
JC	Catanzano, Jessica	9/1/2021, 10:35 PM
	Seriously. I'm like - Eric cares how we're processing these?	
JC	Catanzano, Jessica	9/1/2021, 10:36 PM
	I get why. But usually he doesn't care about this.	
JC	Cooney, Julianne	9/1/2021, 10:36 PM
	Oh yes, because we know we will get TONS of grievances, so our process here has to be tight as can be.	
JC	Catanzano, Jessica	9/1/2021, 10:36 PM
	He's usually caught up in people stealing alcohol off of flights	
JC	Catanzano, Jessica	9/1/2021, 10:36 PM
	And soap.	
JC	Cooney, Julianne	9/1/2021, 10:37 PM
	He will end up presenting these cases in arbitration - for all of the groups. And as you know, each group has a slightly different process.	
JC	Catanzano, Jessica	9/1/2021, 10:37 PM
	And smuggling dogs	
JC	Catanzano, Jessica	9/1/2021, 10:37 PM
	Oh I know	
JC	Cooney, Julianne	9/1/2021, 10:37 PM
	And the fighters - can't forget the fighters.	
JC	Cooney, Julianne	9/1/2021, 10:37 PM
	Oh and lots of waivers and favors	

APP.536

JC Catanzano, Jessica 9/1/2021, 10:37 PM  
So many

JC Catanzano, Jessica 9/1/2021, 10:37 PM  
I cannot imagine how many grievances and lawsuits were going to get

JC Catanzano, Jessica 9/1/2021, 10:38 PM  
I got a legal hold notice today

JC Cooney, Julianne 9/1/2021, 10:38 PM  
So so many

JC Cooney, Julianne 9/1/2021, 10:38 PM  
I get legal hold notices several times per week, lol

JC Catanzano, Jessica 9/1/2021, 10:38 PM  
Yeah. Well I'm in the club now. Usually it's all of you guys who deal with actual employees

JC Catanzano, Jessica 9/1/2021, 10:39 PM  
Which I've managed to steer clear of until now

JC Cooney, Julianne 9/1/2021, 10:39 PM  
Welcome to the club...

JC Catanzano, Jessica 9/1/2021, 10:39 PM  
Ok so we'll clear up 9/27 tomorrow

JC Catanzano, Jessica 9/1/2021, 10:39 PM  
And find out what we're doing with rap

JC Cooney, Julianne 9/1/2021, 10:39 PM  
Sounds good.

JC Catanzano, Jessica 9/1/2021, 10:40 PM  
And I wish someone (Zach?) would mention that it makes no sense by workgroup

JC Catanzano, Jessica 9/1/2021, 10:40 PM  
For at least 8 reasons

JC Catanzano, Jessica 9/1/2021, 10:40 PM  
But I'm not going there

JC Cooney, Julianne 9/1/2021, 10:41 PM  
I don't know if he will say anything. I can plant a seed possibly.

JC Catanzano, Jessica 9/1/2021, 10:41 PM  
Seriously. Administratively and common sense wise...

JC Catanzano, Jessica 9/1/2021, 10:41 PM  
Anyway

JC Catanzano, Jessica 9/1/2021, 10:42 PM  
Btw did Alison move out?

JC Cooney, Julianne 9/1/2021, 10:42 PM  
I completely agree. Plus I don't think folks realize how often ramp and techs are in front of passengers.

JC Catanzano, Jessica 9/1/2021, 10:42 PM  
She seems to be in a new apartment

JC Catanzano, Jessica 9/1/2021, 10:43 PM  
Ramp all the time

JC Cooney, Julianne 9/1/2021, 10:43 PM  
She did. She lives in the city now. She moved 20 min from Willis. So now they drive back and forth. She was here all last weekend. She is coming on the trip with us but is only doing the first week.

JC Catanzano, Jessica 9/1/2021, 10:43 PM  
Awww

JC Cooney, Julianne 9/1/2021, 10:44 PM  
I totally understand that she got tired of living with her bf's parents (meaning me) and I know she wanted to be close to UA. So she starting planning when UA started the return to the office discussions.

JC Cooney, Julianne 9/1/2021, 10:45 PM  
Her place is cute - I've been a few times. Seems like a nice enough area.

JC Cooney, Julianne 9/1/2021, 10:45 PM  
It's a studio.

JC Catanzano, Jessica 9/1/2021, 10:45 PM  
Well I'm glad it didn't mean a breakup

JC Cooney, Julianne 9/1/2021, 10:46 PM  
No, they still seem to be going strong. Although it is odd to me that they used to spend every hour together and now they only see each other a few times per week. My son works out here so that makes it a little tough.

JC Cooney, Julianne 9/1/2021, 10:46 PM  
But I know they had a great weekend last weekend. She came here Thursday night and they were busy the entire weekend.

JC Cooney, Julianne 9/1/2021, 10:47 PM  
They really are cute together. I hope it lasts - I really like her.

JC Catanzano, Jessica 9/1/2021, 10:47 PM  
Me too.

JC Catanzano, Jessica 9/1/2021, 10:47 PM  
It's probably healthy to have some space

JC Cooney, Julianne 9/1/2021, 10:47 PM  
She said she basically got assigned to Kirk's team and loves working with you.

JC Catanzano, Jessica 9/1/2021, 10:48 PM  
Says the woman who lives with her ex husband

JC Cooney, Julianne 9/1/2021, 10:48 PM  
So he is still there? The 3 of you? You, him and the bird.



JC	Catanzano, Jessica And the dog	9/1/2021, 10:48 PM
JC	Catanzano, Jessica He claims he's leaving 10/1	9/1/2021, 10:48 PM
JC	Cooney, Julianne As long as it's all amicable, I honestly see nothing wrong with that.	9/1/2021, 10:48 PM
JC	Catanzano, Jessica I have seen no evidence	9/1/2021, 10:48 PM
JC	Cooney, Julianne So it's not just for convenience?	9/1/2021, 10:49 PM
JC	Catanzano, Jessica It is. And his laziness	9/1/2021, 10:49 PM
JC	Catanzano, Jessica And probably some emotions in there	9/1/2021, 10:49 PM
JC	Cooney, Julianne Wouldn't it be nice to be lazy? Not sure what that means.	9/1/2021, 10:49 PM
JC	Catanzano, Jessica Me neither	9/1/2021, 10:49 PM
JC	Cooney, Julianne Yes, I'm sure there have to be a lot of emotions there. How could there not be.	9/1/2021, 10:50 PM
JC	Catanzano, Jessica It's been a long couple of years	9/1/2021, 10:50 PM
JC	Catanzano, Jessica And now we're putting stickers on badges	9/1/2021, 10:50 PM
JC	Catanzano, Jessica Good lord	9/1/2021, 10:50 PM
JC	Cooney, Julianne And how long were you together? Seems like a really long time.	9/1/2021, 10:50 PM
JC	Catanzano, Jessica 20 years	9/1/2021, 10:51 PM
JC	Cooney, Julianne I know, stickers on badges	9/1/2021, 10:51 PM
JC	Catanzano, Jessica Well 2001	9/1/2021, 10:51 PM
JC	Cooney, Julianne 20 years is a long long long time	9/1/2021, 10:51 PM



JC Catanzano, Jessica 9/1/2021, 10:51 PM  
So I will have known him since 2001.

JC Catanzano, Jessica 9/1/2021, 10:51 PM  
First date was 9/12/2001

JC Catanzano, Jessica 9/1/2021, 10:51 PM  
Clearly I was not working for United at the time

JC Cooney, Julianne 9/1/2021, 10:52 PM  
I'm sorry it did not last. But 20 years is something I would still consider successful.

JC Catanzano, Jessica 9/1/2021, 10:52 PM  
Good point

JC Catanzano, Jessica 9/1/2021, 10:52 PM  
Ok I'm going to bed so I can go to work

JC Cooney, Julianne 9/1/2021, 10:52 PM  
Me too - just as soon as I finish reviewing these darn Catering docs. Lauren Pierce did such a good job. OK, GN. Talk to you tomorrow.

JC Catanzano, Jessica 9/1/2021, 10:53 PM  
Night!

# **EXHIBIT 100**

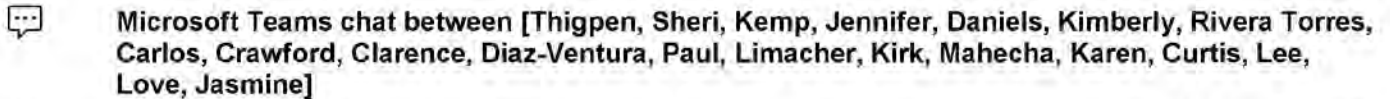
Short Message Report

Conversations: 1	Participants: 10
Total Messages: 175	Date Range: 9/3/2021

Outline of Conversations

 Microsoft Teams chat between [Thigpen, Sheri, Kemp, Jennifer, Daniels, Kimberly, Rivera Torres, Carlos, Crawford, Clarence, Diaz-Ventura, Paul, Limacher, Kirk, Mahecha, Karen, Curtis, Lee, Love, Jasmine] • 175 messages on 9/3/2021 • Crawford, Clarence • Curtis, Lee • Daniels, Kimberly • Diaz-Ventura, Paul • Kemp, Jennifer • Limacher, Kirk • Love, Jasmine • Mahecha, Karen • Rivera Torres, Carlos • Thigpen, Sheri

Messages in chronological order (times are shown in GMT -05:00)

 Microsoft Teams chat between [Thigpen, Sheri, Kemp, Jennifer, Daniels, Kimberly, Rivera Torres, Carlos, Crawford, Clarence, Diaz-Ventura, Paul, Limacher, Kirk, Mahecha, Karen, Curtis, Lee, Love, Jasmine]

CT Rivera Torres, Carlos 9/3/2021, 9:02 AM

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CT Rivera Torres, Carlos 9/3/2021, 9:02 AM

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CT Rivera Torres, Carlos 9/3/2021, 9:38 AM

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CT

Rivera Torres, Carlos

9/3/2021, 9:42 AM

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Image: 0-eus-d16-73a92fdd9688f2555bc16073ee237373.jpeg (384 KB)

File "58b81f2-1630680170179-0-eus-d16-73a92fdd9688f2555bc16073ee237373.json" is missing.  
Attachment: 0-eus-d16-73a92fdd9688f2555bc16073ee237373.json (324 KB)

PV

Diaz-Ventura, Paul  
AMSIImage sent

9/3/2021, 10:36 AM



image: 0-cus-d3-4f6b096b20b8a97353ca063e41d9f60d.png (1 MB)

CT	<p>Rivera Torres, Carlos</p> <p>Nope...definitely not a 3rd party letter</p>	9/3/2021, 10:37 AM
PV	<p>Diaz-Ventura, Paul</p> <p>I sent the verbiage. Just a wow!</p>	9/3/2021, 10:37 AM
CT	<p>Rivera Torres, Carlos</p> <p>Prepare to be surprised often...</p>	9/3/2021, 10:37 AM
PV	<p>Diaz-Ventura, Paul</p> <p>I had no clue people could pay for a letter!</p>	9/3/2021, 10:38 AM
CC	<p>Crawford, Clarence</p> <p>I'll tell you all some of my We Care stories</p>	9/3/2021, 10:38 AM
CT	<p>Rivera Torres, Carlos</p> <p>it is a money making machine</p>	9/3/2021, 10:38 AM
CC	<p>Crawford, Clarence</p> <p>one day</p>	9/3/2021, 10:38 AM
CT	<p>Rivera Torres, Carlos</p> <p>just noticed the lady's last name is Rivera...definitely NOT related!</p>	9/3/2021, 10:43 AM
PV	<p>Diaz-Ventura, Paul</p> <p>Sorry, are we handling these cases any different way for MD's?</p>	9/3/2021, 10:49 AM
KD	<p>Daniels, Kimberly</p> <p>No we are...all the same.</p>	9/3/2021, 10:50 AM
KD	<p>Daniels, Kimberly</p> <p>*not</p>	9/3/2021, 10:50 AM
PV	<p>Diaz-Ventura, Paul</p> <p>Thanks.</p>	9/3/2021, 10:50 AM
CT	<p>Rivera Torres, Carlos</p> <p>please refer to an email just sent to all of you regarding a case we would deem possible denial.</p>	9/3/2021, 10:55 AM

LC Curtis, Lee 9/3/2021, 10:57 AM  
Did anyone's Documentum go down?

ST Thigpen, Sheri 9/3/2021, 11:00 AM  
no, not mine Curtis, Lee

KM Mahecha, Karen 9/3/2021, 11:10 AM  
mine is working now

LC Curtis, Lee 9/3/2021, 11:10 AM  
me too

JL Love, Jasmine 9/3/2021, 11:20 AM  
AMSImage sent

So this answer to my question automatically moves the case to Priority 5 - Planning, which is a Pending Closed, correct?!

Image: Q-cus-d4-4ec8f4776231a60364b4ca19accbd6af.png (43 KB)

CT Rivera Torres, Carlos 9/3/2021, 11:22 AM  
yes...moves to 5

JL Love, Jasmine 9/3/2021, 11:23 AM  
Ok. Not like the game show where they get the last prompt of... "Is this your final answer?"

CT Rivera Torres, Carlos 9/3/2021, 11:24 AM  
no...more like duly noted.

PV Diaz-Ventura, Paul 9/3/2021, 11:24 AM  
EE has not submitted their "personal and sincerely-held religious belief or practice" in the 3 days... place in 5?

LC Curtis, Lee 9/3/2021, 11:25 AM  
Paul, lets look at that one together this afternoon.

CT Rivera Torres, Carlos 9/3/2021, 12:01 PM  
As a reminder, make sure anyone who we asked for docs or a statement that has NOT provided either place on priority 5 - planning and dont close out yet. We will review the situation with legal and if all of those cases are for failure to provide a 3rd party document or their religious belief statement we may be able to do a "mass" update with generic verbiage and close out. Key thing here is DONT CLOSE OUT but rather set priority to 5 Planning. Thanks!

PV Diaz-Ventura, Paul 9/3/2021, 12:06 PM

# Redacted - Privileged

CT

ST Thigpen, Sheri 9/3/2021, 12:39 PM  
A FO sent me an e-mail directly. Do I acknowledge receipt by responding in his HRCASE or do nothing because it was sent to me personally and not a question asked in his RAP case?



CT Rivera Torres, Carlos 9/3/2021, 12:40 PM  
review with Kim to see if it is something we should reply to...and if so do so in the case.

CT Rivera Torres, Carlos 9/3/2021, 12:41 PM  
In your email simply advise him to check his case for the reply and to ensure all replies are send directly to the RAP case and not to your corporate email.

KD Daniels, Kimberly 9/3/2021, 12:43 PM  
Sheri...We can also do a check in at 3: 30 on any cases you might have questions on so you can keep moving if you like.

CT Rivera Torres, Carlos 9/3/2021, 12:49 PM  
AMSIimage sent  
  
when you deem that we should close out a case and change the priority to 5 - planning, enter in the WORK NOTES field quick verbiage to reference to with suggestion

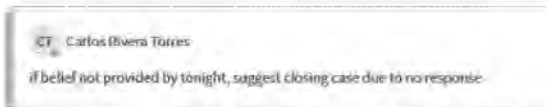
 Carlos Rivera Torres  
if belief not provided by tonight, suggest closing case due to no response.

Image: 0-eus-d5-df9a3657d456afb1faa2cd2440f639ae.png (6 KB)

KM Mahecha, Karen 9/3/2021, 1:21 PM  
when changing a status to critical, do I change to true the documents received?

CT Rivera Torres, Carlos 9/3/2021, 1:21 PM  
dont do anything else but set to critical

KM Mahecha, Karen 9/3/2021, 1:21 PM  
got it, thanks!

ST Thigpen, Sheri 9/3/2021, 1:38 PM  
Daniels, Kimberly  
i have a few pilots now sending me personal emails...lol

CT Rivera Torres, Carlos 9/3/2021, 1:38 PM  
welcome to our world!!

ST Thigpen, Sheri 9/3/2021, 1:39 PM  
Rivera Torres, Carlos  
can we update the template to say please do not email me directly? but stated nicer

CT Rivera Torres, Carlos 9/3/2021, 1:39 PM  
just ignore email...

CT Rivera Torres, Carlos 9/3/2021, 1:40 PM  
answer within the case only

KM Mahecha, Karen 9/3/2021, 1:40 PM  
I have an employee stating they have medical condition preventing taking the vaccine. They added a note from the doctor stating severe allergies and asthma<font face="Arial">.  
</font><font face="Arial">Can I still transfer the case to ESCMD and enter the information needed?  
</font>



KD Daniels, Kimberly 9/3/2021, 1:41 PM  
 Thigpen, Sheri  
 We can swap stories this afternoon! And the quick answer to your questions to Carlos is no. It's populated from HH.  
 They just choose to email us directly...Respond in the case for now.

ST Thigpen, Sheri 9/3/2021, 1:42 PM  
 they are sending me attachments to upload to the case. i will upload them now

JL Love, Jasmine 9/3/2021, 1:43 PM  
 Mahecha, Karen  
 yes, transfer to ESCMD

CC Crawford, Clarence 9/3/2021, 1:43 PM  
 EE attached a summary visit note from his doctor that states "patient is catholic , due to religious beliefs opposes vaccination." Its safe to leave this one as religious right

CT Rivera Torres, Carlos 9/3/2021, 1:44 PM  
 leave as religious but not sure if this would be a 3rd party letter

CC Crawford, Clarence 9/3/2021, 1:44 PM  
 I know. He submitted several internet letter and just left <insert name>. Then on another he wrote in his name above <insert name>


JL Love, Jasmine 9/3/2021, 1:45 PM  
 File sent: 

  
 Image: ? .png (2 KB)

ST Thigpen, Sheri 9/3/2021, 1:46 PM  
 i have a husband and wife (both Pilots) tag teaming me!! LOL...I am going to get more COFFEE!!!

PV Diaz-Ventura, Paul 9/3/2021, 1:46 PM  
 Diet Coke!

JL Love, Jasmine

9/3/2021, 1:46 PM

File sent: Snow White Coffee GIF (GIF Image)



Image: Snow White Coffee GIF (GIF Image).gif (204 KB)

PV Diaz-Ventura, Paul

9/3/2021, 1:49 PM

Sigh another one.

AMSIImage sent

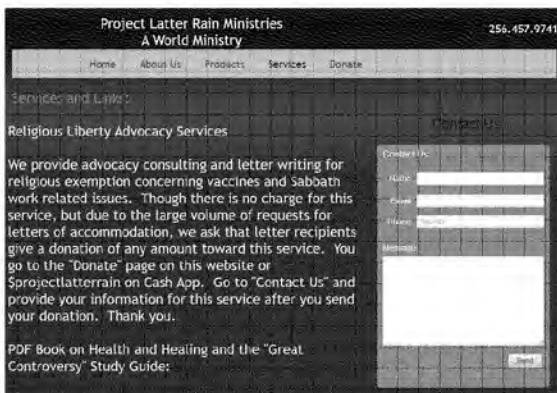


Image: 0-cus-d14-d9ab2b76f6af57178e8ecfd5522f9de9.png (115 KB)

CC Crawford, Clarence

9/3/2021, 1:52 PM

Add Destiny Christian Church

AMSIImage sent

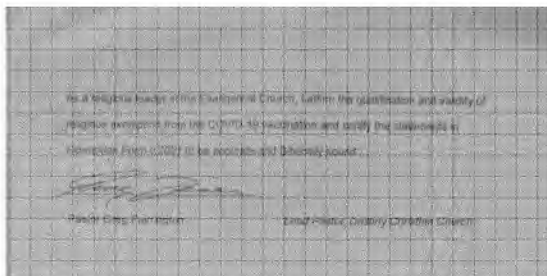


Image: 0-cus-d11-38043f2785f41a6aa602cf896b1c37f1.png (222 KB)

CC Crawford, Clarence

9/3/2021, 1:52 PM

Pastor offers exemption letters for COVID vaccine skeptics - Los Angeles Times (latimes.com)

APP.549

KM Mahecha, Karen 9/3/2021, 2:12 PM  
I have one from note from South Dakota Catholic Conference. The employee lives in IL and I was able to download the same statement from their website.  
<https://sdcatholicconference.org/covid-19-vaccination-requirements/>

CT Rivera Torres, Carlos 9/3/2021, 2:13 PM  
Crawford, Clarence  
does the letter actually say the employees name?

CC Crawford, Clarence 9/3/2021, 2:14 PM  
Yes it was written in.

CC Crawford, Clarence 9/3/2021, 2:14 PM  
The first page was about the religious beliefs

CT Rivera Torres, Carlos 9/3/2021, 2:14 PM  
let it be and consider as 3rd party

JL Love, Jasmine 9/3/2021, 2:15 PM  
Carlos... are you addressing Karen's too?

JL Love, Jasmine 9/3/2021, 2:16 PM  
Or was that for Crawford, Clarence

CT Rivera Torres, Carlos 9/3/2021, 2:16 PM  
i am actually working on 5 things at once


CT Rivera Torres, Carlos 9/3/2021, 2:16 PM  
that one was just for Clarence

JL Love, Jasmine 9/3/2021, 2:16 PM  
Mahecha, Karen  
request the 3rd party letter.

KM Mahecha, Karen 9/3/2021, 2:16 PM  
will do! thanks

CT Rivera Torres, Carlos 9/3/2021, 2:16 PM  
Mahecha, Karen  
push back and send the verbiage about generic info from internet

KM Mahecha, Karen 9/3/2021, 2:17 PM  
okay, thanks

PV Diaz-Ventura, Paul 9/3/2021, 3:02 PM  
WHEW - Some of these employees have real long commutes to their congregations. File sent: 😊  
  
image. ? .png (546 bytes)

CC Crawford, Clarence 9/3/2021, 3:02 PM  
LOL

CT Rivera Torres, Carlos 9/3/2021, 3:04 PM  
some have online church in KOA... i thought about pushing back but decided not to since the letter addressed the employee and said member of ONLINE church



JL Love, Jasmine 9/3/2021, 3:05 PM  
I get it,... sometimes you have to travel to find a church you like.

JL Love, Jasmine 9/3/2021, 3:06 PM  
Can I get that church address in KOA? I'd like to attend in person!

JL Love, Jasmine 9/3/2021, 3:06 PM  
BRB!

PV Diaz-Ventura, Paul 9/3/2021, 3:06 PM  
Jersey to Indiana is a longgggggggg trip. File sent: 

  
image: ?.png (779 bytes)

JL Love, Jasmine 9/3/2021, 3:06 PM  
Nice this time of year!

JL Love, Jasmine 9/3/2021, 3:06 PM  
Plus with the flooding and all.

ST Thigpen, Sheri 9/3/2021, 3:09 PM  
Rivera Torres, Carlos  
just want to confirm if they responded to the 3 questions that were originally being asked<em> (Are you aware if any vaccines or medications you have previously received were created etc) </em>, they still are required to provide a 3rd party letter?

CT Rivera Torres, Carlos 9/3/2021, 3:10 PM  
AMSIImage sent  
here is the letter...see the member of our online congregation verbiage?

  
Calvary Chapel  
Kauai  
471-225-1234 (Kauai) / 471-225-1234 (Kauai) / 471-225-1234 (Kauai)

  
Phone: 808-267-5555  
Fax: 808-267-5555  
www.calvarychapel.com  
www.ccp.org

  
August 23, 2021  
To Whom It May Concern:  
I am writing on behalf of  a member of our online congregation at Calvary Chapel Kauai, in Hawaii, regarding their religious conviction against forced vaccines.  
We do not wish to be labeled as anti-science or anti-vaccine, however, the well-documented process of vaccines developed from animal and aborted human fetal tissue has compelled us to stand by our congregants who refuse to comply with mandatory vaccinations.  
We strongly support their deeply held Biblical conviction as a believer in, and follower of Jesus Christ and any of our congregants to resist the pressure for vaccinations, while at the same time seeking an alternative for their safety and the safety of others.

image: 0-eus-d20-cfda916234795fbd990d8fa2b0feee4.png (80 KB)

PV Diaz-Ventura, Paul 9/3/2021, 3:10 PM  
Thanks! I haven't seen one yet.

CT Rivera Torres, Carlos 9/3/2021, 3:11 PM  
Since I have HNL i have a bunch...i also have some folks from SFO "attending"

JL Love, Jasmine 9/3/2021, 3:12 PM  
Thigpen, Sheri  
Yes, however,... we have good verbiage for those that already provided info...

JL Love, Jasmine 9/3/2021, 3:12 PM  
Thank you very much for your response. As a final step in this process, please provide within the next 3 days written documentation from a third party, whom you personally know, who is aware of your sincerely held religious belief and

APP.551




can support your request for a religious accommodation.

JL Love, Jasmine 9/3/2021, 3:12 PM  
Special thanks to Lee!

CT Rivera Torres, Carlos 9/3/2021, 3:13 PM  
Thigpen, Sheri  
if they answered previous questions all still need the 3rd party letter. if they did not answer those more "specific" questions dont worry...

ST Thigpen, Sheri 9/3/2021, 3:14 PM  
Thanks! Rivera Torres, Carlos

CT Rivera Torres, Carlos 9/3/2021, 3:14 PM  
File sent: 😊

  
Image: ? .png (2 KB)

PV Diaz-Ventura, Paul 9/3/2021, 3:17 PM  
This guy paid \$75 for the letter and \$15 for it to be mailed. Whew - big money in these letters.

CT Rivera Torres, Carlos 9/3/2021, 3:20 PM  
yep

CT Rivera Torres, Carlos 9/3/2021, 3:21 PM  
you will notice the site has disclaimers so in case they are not accepted they cant blame them!

PV Diaz-Ventura, Paul 9/3/2021, 3:21 PM  
I looked up the church address. The church address is coincidentally the chiro office address. Get an adjustment and head right to church.

CC Crawford, Clarence 9/3/2021, 3:22 PM  
Those Holy Ghost muscle pulls are a real thing

LC Curtis, Lee 9/3/2021, 3:28 PM  
If someone is an ordained minister, do we still request a 3rd party doc?

JL Love, Jasmine 9/3/2021, 3:29 PM  
I have.

CT Rivera Torres, Carlos 9/3/2021, 3:29 PM  
sounds odd but yes

LC Curtis, Lee 9/3/2021, 3:29 PM  
According to the gospel of Carlos

LC Curtis, Lee 9/3/2021, 3:29 PM  
I will

CT Rivera Torres, Carlos 9/3/2021, 3:29 PM  
the reason is that the religion itself is not saying dont get vaccinated,

CT	Rivera Torres, Carlos It is the employees personal religious belief and how they interpret their religion	9/3/2021, 3:29 PM
JL	Love, Jasmine They will def be able to find SOMEBODY that knows them and their religious beliefs.	9/3/2021, 3:30 PM
JL	Love, Jasmine Or one would hope.	9/3/2021, 3:30 PM
LC	Curtis, Lee This is exhausting	9/3/2021, 3:31 PM
JL	Love, Jasmine Adding an ORD Pilot that lives in FL to the KOA online church congregant. Were we ok with that letter as a 3rd party document Rivera Torres, Carlos ?	9/3/2021, 4:05 PM
CT	Rivera Torres, Carlos its an online church so...	9/3/2021, 4:05 PM
CT	Rivera Torres, Carlos ok to accept	9/3/2021, 4:05 PM
JL	Love, Jasmine Oprah thanks you!	9/3/2021, 4:05 PM
CT	Rivera Torres, Carlos hahahaha	9/3/2021, 4:05 PM
PV	Diaz-Ventura, Paul If I am granted a reasonable accommodation, will I have to opportunity to work remotely?	9/3/2021, 4:21 PM
PV	Diaz-Ventura, Paul I didn't know Ramp Agents could load bags and cargo into planes from home.	9/3/2021, 4:21 PM
CT	Rivera Torres, Carlos hahahaha!	9/3/2021, 4:21 PM
CC	Crawford, Clarence it'll be a new olympic sport	9/3/2021, 4:22 PM
ST	Thigpen, Sheri Diaz-Ventura, Paul thanks for that much needed laugh!	9/3/2021, 4:22 PM
CT	Rivera Torres, Carlos if we don't laugh we would be crying all day!	9/3/2021, 4:23 PM
CC	Crawford, Clarence These are up there with We care request in terms of the questions and stories	9/3/2021, 4:25 PM
PV	Diaz-Ventura, Paul Need another laugh?	9/3/2021, 4:28 PM
PV	<u>Diaz-Ventura, Paul</u> <u>AMSI</u> image sent	9/3/2021, 4:28 PM

APP.553

I purchased a statue of this Buddha from Amazon in 2016 and can provide proof upon request.

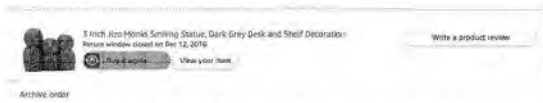


Image: 0-cus-d17-509562c5130e1ff851c2116fb8670404.png (37 KB)

CC

Crawford, Clarence

9/3/2021, 4:29 PM

File sent: Reaction GIF by MOODMAN (GIF Image)



Image: Reaction GIF by MOODMAN (GIF Image).gif (2 MB)

JL

Love, Jasmine

9/3/2021, 4:30 PM

Uhhhhhhmmmmmmmmmmmmmm, what???

JL

Love, Jasmine

9/3/2021, 4:32 PM

Well, if he lost it,... looks like he can purchase it again. So,... about that religious RAP request... need your personal religious conviction letter and that of the 3rd party.

PV

Diaz-Ventura, Paul

9/3/2021, 4:33 PM

His religious conviction letter was screenshots of his buddha posts from facebook in 2019 proving his religious beliefs.

PV

Diaz-Ventura, Paul

9/3/2021, 4:33 PM

I was like oh boy.

JL

Love, Jasmine

9/3/2021, 4:34 PM

File sent: Cant Speak Nathan Fillion GIF (GIF Image)



Image: Cant Speak Nathan Fillion GIF (GIF Image).gif (1 MB)

JL

Love, Jasmine

9/3/2021, 4:34 PM

Ok.

JL

Love, Jasmine

9/3/2021, 4:34 PM

**APP.554**

Give that one to Lee. File sent: 😊



Image: ? .png (653 bytes)

PV	Diaz-Ventura, Paul I sent him a very kind message.	9/3/2021, 4:34 PM
JL	Love, Jasmine And dropped him into #5	9/3/2021, 4:35 PM
JL	Love, Jasmine Kidding.	9/3/2021, 4:35 PM
KM	Mahecha, Karen when we received an affidavit of vaccine exemption form notarized , we still request the third party letter. Right?	9/3/2021, 4:36 PM
CT	Rivera Torres, Carlos yes...notarized just lets us know that it has been confirmed that the employee wrote the statement	9/3/2021, 4:37 PM
JL	Love, Jasmine one has nothing to do with the other.... It seems.	9/3/2021, 4:37 PM
CT	Rivera Torres, Carlos we need another person to attest to what the employee is saying	9/3/2021, 4:37 PM
KM	Mahecha, Karen thanks!	9/3/2021, 4:38 PM
JL	Love, Jasmine Similar to the ordained minister.	9/3/2021, 4:38 PM
PV	Diaz-Ventura, Paul This one is addressed to Mr. Kirby. Ohhhh fancy.	9/3/2021, 4:47 PM
CC	Crawford, Clarence I wonder how many he has in is "email"	9/3/2021, 4:47 PM
KM	Mahecha, Karen an affidavit signed by the church's minister can be considered their third party letter?	9/3/2021, 4:55 PM
JL	Love, Jasmine depends... can you show me the letter?	9/3/2021, 4:56 PM
KM	Mahecha, Karen AMSIimage sent	9/3/2021, 4:56 PM

**APP.555**



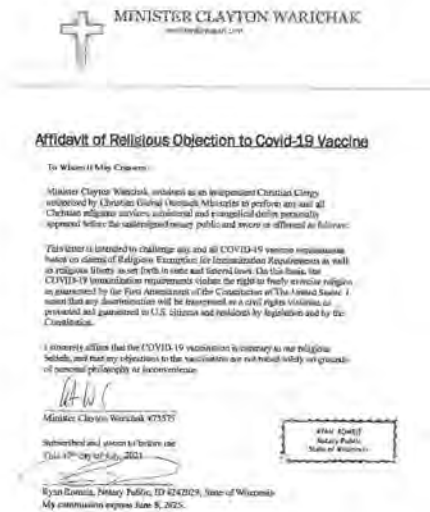


Image: 0-eus-d3-286fa09a5d9c3ca52173d758a84f0624.png (107 KB)

JL	Love, Jasmine I could not find this church...	9/3/2021, 4:57 PM
JL	Love, Jasmine I searched, but could not find.	9/3/2021, 4:57 PM
JL	Love, Jasmine I had 1 from that church yesterday.	9/3/2021, 4:57 PM
PV	Diaz-Ventura, Paul OMG I HAD THAT ONE!	9/3/2021, 4:58 PM
PV	Diaz-Ventura, Paul We benched it.	9/3/2021, 4:58 PM
JL	Love, Jasmine Can you do a quick search? I kept getting Reagan, our president's web page.	9/3/2021, 4:58 PM
PV	Diaz-Ventura, Paul I couldn't find anything!!!	9/3/2021, 4:58 PM
JL	Love, Jasmine Not a good document, Karen.	9/3/2021, 4:58 PM
JL	Love, Jasmine Get the 3rd party letter.	9/3/2021, 4:58 PM
KM	Mahecha, Karen I am but got a linkdin page and something about German Shepherd lol	9/3/2021, 4:59 PM
KM	Mahecha, Karen will do	9/3/2021, 4:59 PM
JL	Love, Jasmine Yes,... I saw that too!	9/3/2021, 4:59 PM

APP.556

PV Diaz-Ventura, Paul 9/3/2021, 4:59 PM  
LOL ME TOO. I LOOKED AT HIS LINKEDIN.

JL Love, Jasmine 9/3/2021, 4:59 PM  
I hope they didn't pay money for that document.

JL Love, Jasmine 9/3/2021, 5:00 PM  
Might want to get the money back.

KM Mahecha, Karen 9/3/2021, 5:00 PM  
no refunds

PV Diaz-Ventura, Paul 9/3/2021, 5:00 PM  
Credit card dispute

KM Mahecha, Karen 9/3/2021, 5:00 PM  
see the fine print

JL Love, Jasmine 9/3/2021, 5:00 PM  
PayPal will give him his money back.

JL Love, Jasmine 9/3/2021, 5:00 PM  
File sent: 😊



Image: ?.png (2 KB)

JL Love, Jasmine 9/3/2021, 5:00 PM  
Love you guys!!!! Have a good night! Back at it tomorrow.

JL Love, Jasmine 9/3/2021, 5:01 PM  
See you tomorrow.

PV Diaz-Ventura, Paul 9/3/2021, 5:01 PM  
Goodnight!!!

KM Mahecha, Karen 9/3/2021, 5:01 PM  
File sent: Im Out Season 8 GIF by The Office (GIF Image)

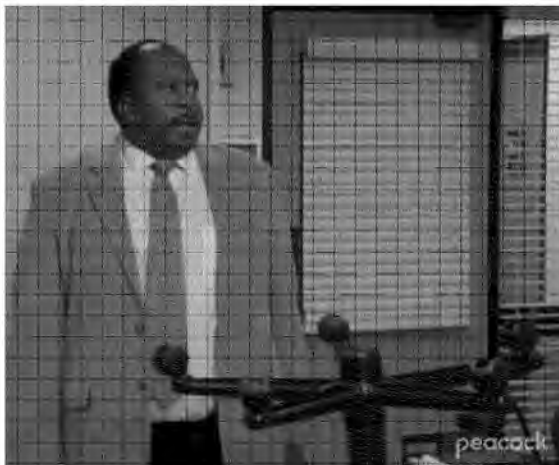


Image: Im Out Season 8 GIF by The Office (GIF Image).gif (4 MB)

APP.557

JK

Kemp, Jennifer

9/3/2021, 5:01 PM

File sent: So Excited Reaction GIF (GIF Image)

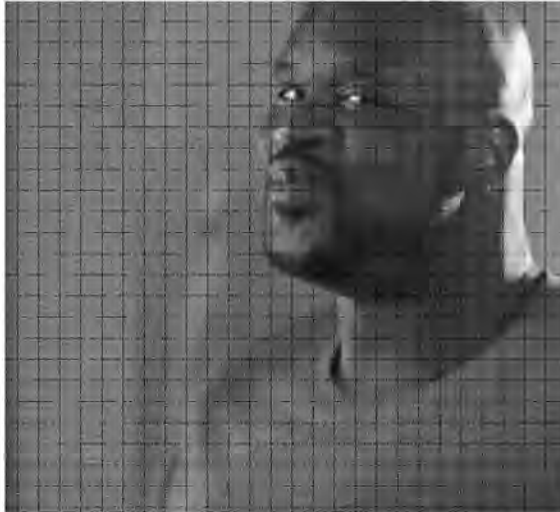


Image: So Excited Reaction GIF (GIF Image).gif (298 KB)

JL

Love, Jasmine

9/3/2021, 5:01 PM

Jen's getting jiggy with it!

JK

Kemp, Jennifer

9/3/2021, 5:03 PM

ya'll are funny, and I'm very sleepy

PV

Diaz-Ventura, Paul

9/3/2021, 5:04 PM

What is the verbiage again for when we get medical and religious?

CC

Crawford, Clarence

9/3/2021, 5:05 PM

<i>Since you have also requested a medical accommodation request from receiving the COVID-19 vaccine, we will forward your case to Company Medical for processing. If they medical accommodation is denied, we will then process your religious accommodation request.</i>

<i>To proceed with the Reasonable Accommodation process, please submit documentation from your medical provider that indicates the following: </i>

<i></i>

<i>1. If the employee is not able to receive the COVID-19 vaccine, what are the specific medical facts to support the restrictions (i.e., specific medical condition, current medical status, etc.)?</i>

APP.558

<i>2. How is the COVID-19 vaccine contraindicated with the employee's medical condition (i.e., hypersensitivity to vaccine ingredients, adverse effects, immunosuppression)?</i>

<i>3. What are the employee's specific physical restrictions, if any? Indicate their parameters and the duration</i>

<i>Attached to this case is a form that can be utilized. Please import the documentation to this Help Hub case or fax to 847-700-2600.</i>

<i></i>

<i>Documentation must be submitted to your Help Hub case within 5 calendar days of this message.</i>

<i>Thank you,</i>

<i>ESC Absence Management

</i>

PV	Diaz-Ventura, Paul Thanks!	9/3/2021, 5:05 PM
PV	Diaz-Ventura, Paul I cannot tell you all how many Project Latter Rain letters I have had. The company writes them for free. HOWEVER, they ask for a donation.	9/3/2021, 5:26 PM
PV	Diaz-Ventura, Paul File sent: Bored To Death Reaction GIF (GIF Image) Goodnight. I can't look at another. I will be dreaming of religious raps.	9/3/2021, 6:36 PM





Image: Bored To Death Reaction GIF (GIF Image).gif (1 MB)

KM

Mahecha, Karen

9/3/2021, 6:37 PM

File sent: Good Night Snl GIF by Saturday Night Live (GIF Image)  
I hear you



Image: Good Night Snl GIF by Saturday Night Live (GIF Image).gif (2 MB)

PV

Diaz-Ventura, Paul

9/3/2021, 6:42 PM

reply from: [andrew.marmorato@united.com](mailto:andrew.marmorato@united.com)

I am respectfully requesting a realistic extension on the 3 days to 6 days. I understand you must be inundated hence the short timeline for responses. I replied accordingly the first time and in approximately 24 hours answered your question on the first request. I would do the same here but I have already left last evening for vacation due to the "Labor Day Holiday" weekend as many Americans do. So to attempt to contact someone at this time and being in this situation you are raising the bar AGAIN on my anxiety, frustration & emotional distress!!!!

If you deny this request I will question the timing of your email now requesting this letter to validate my faith. It is unrealistic to think that on a Friday afternoon on a holiday weekend you are requiring me to get it done when the 3rd day is the actual holiday itself. It's evident the company is attempting to get employees to fail the process at every turn to invalidate my RAP for procedure which is easier then to approve on faith. Although this request is completely illegal I will continue to comply with this process as best as possible considering you unrealistic timing. Please advise one way or the other for a denial or approval of the extension!

Sent from my iPhone

**APP.560**

# **EXHIBIT 101**

From: Olson, Elizabeth [elizabeth.olson@united.com]  
 Sent: 8/22/2021 5:05:07 PM  
 To: Reppas, Paula [paula.reppas@united.com]  
 CC: Krasovec, Frank [Frank.M.Krasovec@united.com]; Dunn, Gary [Gary.Dunn@united.com]; Warren, Raymond [Ray.Warren@united.com]; Olson, Elizabeth [elizabeth.olson@united.com]  
 Subject: CONFIDENTIAL PLEASE READ

Importance: High

Summary of the Serious Situation regarding Covid-19 Vaccine and Discrimination thereof:

On Saturday August 21, 2021, DEN Move Team employee [REDACTED] came into my office to ask about some days off that he needs, he then started talking generally about the vaccine, he said "I don't want the vaccine but I probably will get it because I have to feed my kids but it sucks to be treated badly for my belief's/choices and have people at work be so strong and vocal against us." I asked what he meant by that, he stated that "he heard Jana Trenck say "everyone in this room that's not vaccinated should get sick and die" and that this is not the first time she has said things against and in the presence of employees she knows are unvaccinated."

Today Sunday August 22, 2021 Assistant Manager Ray Warren and I were in the supervisor office and [REDACTED] stopped by and said, "I'm getting my vaccination soon, on top of who we were talking about yesterday (Jana) I'm tired of feeling pressure from our representatives who are supposed to treat us fair and equal (shop stewards) making comments about being unvaccinated and needing to get the vaccine.

DEN Move Team employee [REDACTED] has come to me a few times in the last 10 days sharing that he is really struggling with the upcoming decision regarding getting the Covid-19 vaccination and his reasoning behind it. I feel it is part of my job to let people share their thoughts and feelings and to be a good listener/resource for them. I explained the ways he could try to get an exemption but as it stands he knows that it may come down to resignation or termination should he get to the deadline without being vaccinated. I know [REDACTED]'s personality and he has been very withdrawn and unhappy, very quiet and myself and a few others know he is struggling, he has dropped a few comments that certain people and their comments have made him uncomfortable at his job and he feels completely discriminated against.

Today when I was checking my manpower for tomorrow morning I noticed [REDACTED]'s name was not on the list when it had been the previous day. I pulled up his ETA and noticed that he had DAT's put in for the rest of this week. As I know he's been struggling I called to check up on him. I asked him if he was ok and he replied "no I'm not, I'm dealing with a lot and I'm having really bad anxiety. I don't want to be at work, and I don't like how I feel I'm being treated at work by some of my peers, it's really uncomfortable." I told him some things have come to my attention and proceeded to ask him if anything in particular had been said, he stated "Jana Trenck had made a statement in front of a few unvaccinated employees including myself that "everyone in this room that's not vaccinated should get sick and die." He then said that "that's only one of many comments that have been made by her, she says things all the time and she's not the only one."

In previous conversations with [REDACTED] he has mentioned that she ostracizes and entices peers but has been unable to lure targeted individuals into a confrontational response, he also believes that the Move Team shop stewards use peer pressure and will not be fair to or respect the unvaccinated stance so they can't be trusted with this matter.

On August 6, 2021 when the announcement regarding the vaccine mandate came out I asked DEN Move Team Employee and IAM Shop Steward Darryl Bowdry to come to my office. I stated that "as a shop steward for the

APP.562



Move Team if you hear any of our employees making unnecessary comments in a direct or indirect manner that could potentially be offensive to employees on either perspectives of the vaccine and the mandate to please advise them that this is a personal decision/choice that everyone is going to have to make and for their own benefit not to be discussing it." He agreed that he would do that but also stated "that he believes everyone should be vaccinated or get out." I then asked him "as a shop steward you represent both vaccinated and unvaccinated employees, are you going to be able to do that given what you have just shared with me, should a situation regarding the vaccine arise" he was hesitant but stated that he would be.

On August 17, 2021 when word got around that DEN Move Team Employee [REDACTED] had been exposed to Covid-19 Darryl immediately came into my office, closed the door and proceeded to say that "[REDACTED] hasn't been vaccinated and that he was stupid and irresponsible for going to Super Spreader Sturgis, that he was a safety risk to everyone on the Move Team, he should be separated from everyone and so should everyone that hasn't been vaccinated." I explained to him that the current protocol for exposure is to self-monitor and to call Gary Dunn or HR if he has an issue with that. He was not happy with my response.

I have had the same conversation that I had with Darryl Bowdry with DEN Move Team Employee and IAM shop steward Mike Paolillo regarding shutting down any comments or discussion on the vaccine with respect to personal choices and beliefs. On Friday August 20<sup>th</sup>, 2021 prior to knowing about the egregious death comment made by Jana Trenck I overheard Jana from down the hallway talking badly of the Company's current protocol regarding exposure/self-monitoring and making personal statements against [REDACTED] along the lines of political views, vaccine status/beliefs and his personal fears. [REDACTED] was not present to defend himself. I walked directly into the Dispatchers office and told Mike Paolillo that he needs to go and talk to Jana and tell her to stop talking poorly of people and their personal beliefs, to which he replied "I'm sure she's joking, we talk about each other all the time." I told him this is not a joke it needs to stop now. He proceeded to talk to everyone in the room. I received a phone call that I had to answer so I proceeded to my office. The only part of the conversation that I heard was towards the end when Mike said "stop joking around about this" and Jana said "oh I'm not joking, I've never been joking."

The aforementioned statement reveals the following facts:

- Employees are feeling uncomfortable in their place of work due to bullying, harassment and discrimination.
- Employees feel that Move Team shop stewards are not and will not represent and treat them fairly.
- Employees feel that their personal beliefs and choices are being put on display to promote further ostracization and discrimination.
- The safety and wellbeing of our work place for all employees has been put in jeopardy.
- At least one employee's mental and physical health has been affected as a result of bullying. (For the concern/benefit of the employee IAM EAP has been contacted)
- The unwanted behavior of a few Move Team employees is causing division and segregation within the Move Team group.
- Unwarranted and unsolicited comments regarding mortality have been aimed at individuals as well as a specific (unvaccinated) group of employees.
- Verbal attacks are being made on employee's characters and beliefs.

As this situation is escalating and it is of a very serious and sensitive matter along with the fact that there is direct violation of the United Airlines Working Together Guidelines and United's policy on bullying and their

**APP.563**



stand against discrimination and bullying of any kind, to any individual or community I ask that the Human Resource Group and Corporate Security pursue this matter immediately.

Please feel free to contact me if any additional information is needed, I will be at work by 0400 tomorrow morning.

Thank you,

Elizabeth Olson

Move Team/De-icing Operations Supervisor

United | 8900 Pena Boulevard | Denver, CO 80249

Tel 303-348-2962 | Cell 303-518-0253 | [elizabeth.olson@united.com](mailto:elizabeth.olson@united.com)

**APP.564**

# **EXHIBIT 102**

**From:** Robb, Neil [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5102C14D51C44BBB87A82B14107B42AC-U368374]  
**Sent:** 8/30/2021 2:29:08 PM  
**To:** Love, Jasmine [jasmine.love@united.com]  
**Subject:** RE: Core 4 - RAP for Religion

# Redacted-Privileged

**From:** Love, Jasmine <jasmine.love@united.com>  
**Sent:** Monday, August 30, 2021 2:24 PM  
**To:** Robb, Neil <neil.robb@united.com>  
**Subject:** RE: Core 4 - RAP for Religion

That will be helpful for the decisions.

In the interim and since we don't have a good Help Hub workaround to create anonymity,... I'll unassign all of the Midwest RAP cases today so that they fall back into the unassigned queue. As it is... I have employees reaching out to me directly since we were assigning the cases to ourselves to run reports and to manage the workload and to remove from our normal Absence Management work.

Unfortunately, I'll still be identified as "the person" that needs more info, but since it will be under the guise created that "I have been asked to request more info," perhaps that will work. Not sure.

Jasmine

**From:** Robb, Neil <neil.robb@united.com>  
**Sent:** Monday, August 30, 2021 12:48 PM  
**To:** Love, Jasmine <jasmine.love@united.com>  
**Subject:** RE: Core 4 - RAP for Religion

Hello.

All good points, thank you for sharing. Our intent was never to have a person's name attached to a letter. I was thinking of signing them all "RAP Specialist" as that is the current signature on all letters. Would that work?

**From:** Love, Jasmine <jasmine.love@united.com>  
**Sent:** Sunday, August 29, 2021 10:00 PM  
**To:** Robb, Neil <neil.robb@united.com>  
**Subject:** Core 4 - RAP for Religion

Neil,  
I think that we are doing a great job of working these cases with Care, Efficiency, and Dependability, but I think that we are not considering the Safety of our team as we communicate with the employees. We are processing cases that will no doubt end up in some type of litigation and that will stir a level of anger if the end result negatively impacts the employee. I feel incredibly uncomfortable having my name attached to cases that question someone's religious faith, scientific views, and/or constitutional views. Many of the cases that we are receiving are from people who believe with

**APP.566**

their very CORE in what they are requesting,... a RELIGIOUS reasonable accommodation of not taking the vaccine due to their religious views, scientific views, and naturalist lifestyles.

If we are moving to place people on a leave status without pay, this will ultimately impact their finances. I don't feel comfortable with my name being attached to decisions that are made that question an employee's religions or scientific views and that may impact their finances if they choose to not comply with the direction of the company. I also don't want to be associated with any communications that deny that an individual has a valid religious belief or otherwise.

As mentioned before, I think that it is really important that the employees know that these decisions are being made by a committee. Managing the cases as they are within Help Hub allows no anonymity and since I'm not making any of the decisions we have to change the way these cases are being processed in Help Hub.

What can be done to immediately move these cases within Help Hub so that the additional info needed OR the final decision is coming from a group other than our small team of 4 that is in no way making any of the final decisions? I don't feel safe in the direction that we are going.

Sincerely,

**Jasmine Love**

Manager, ESC Operations  
United | Corporate Support Center  
233 South Wacker Drive, 25th Floor | Chicago, IL 60606 |  
[Jasmine.Love@united.com](mailto:Jasmine.Love@united.com) | Mobile: 872-333-1937 |

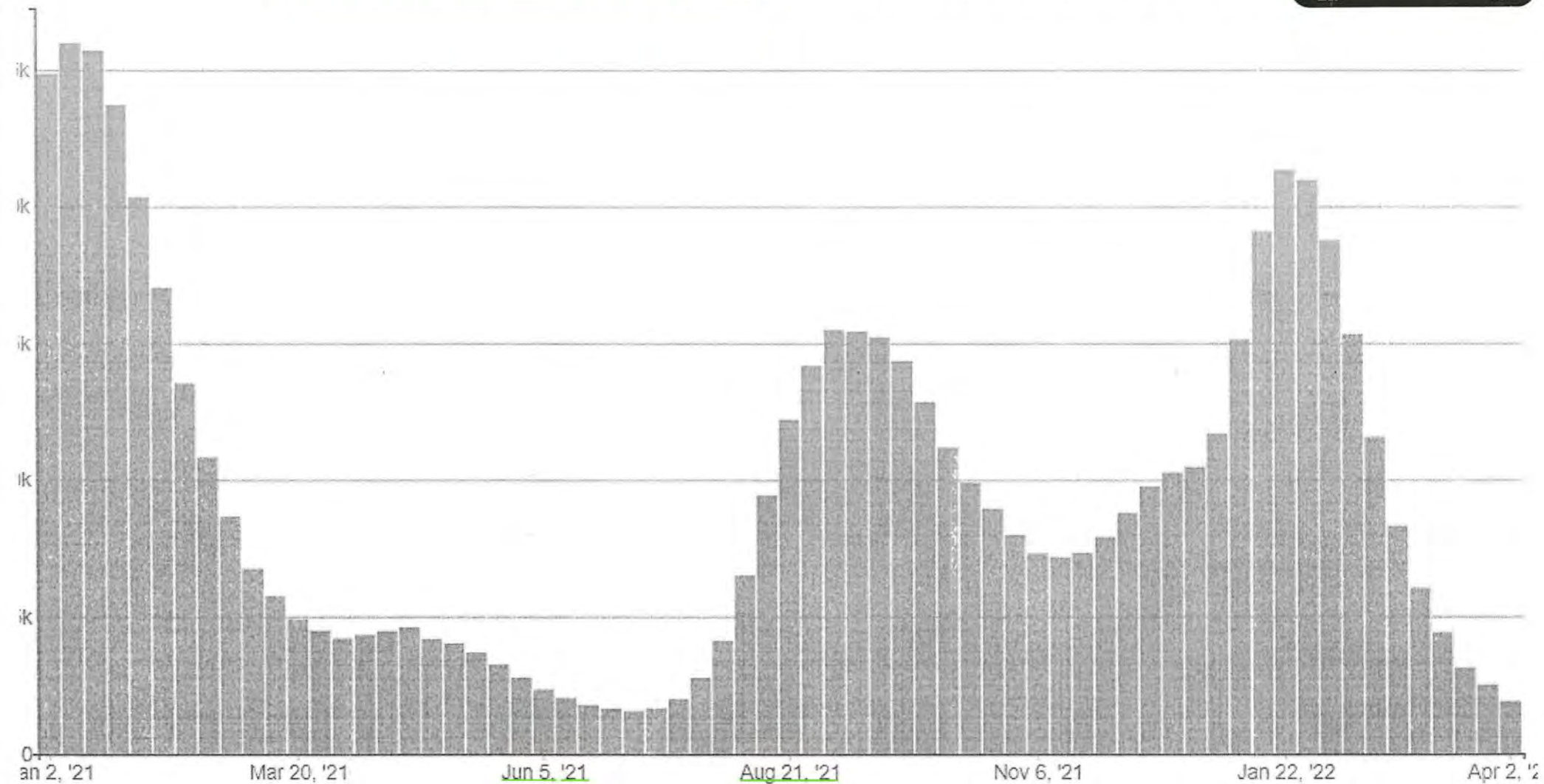
**APP.567**



# **EXHIBIT 103**

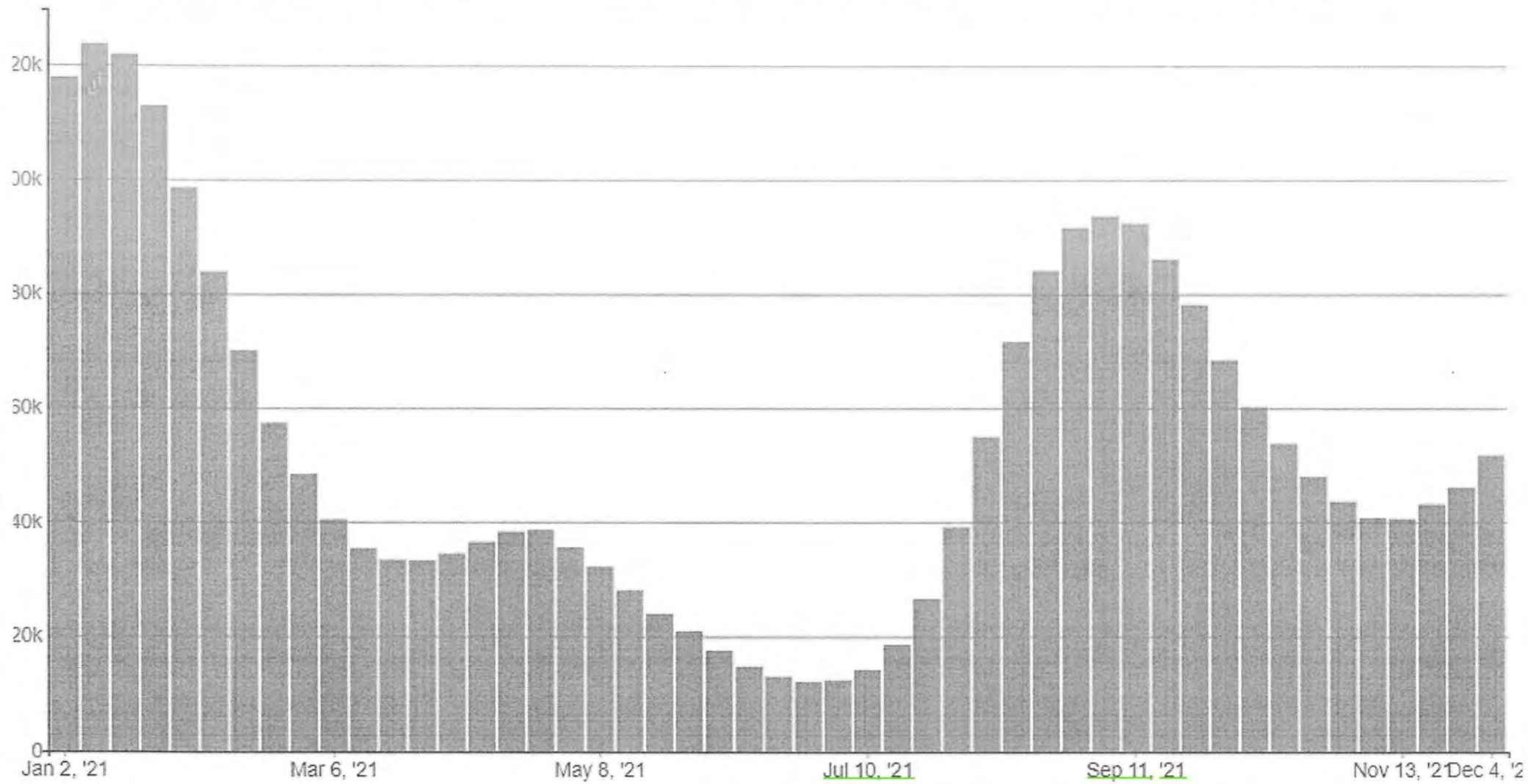


Provisional COVID-19 Deaths, by Week, in The United States, Reported to CDC



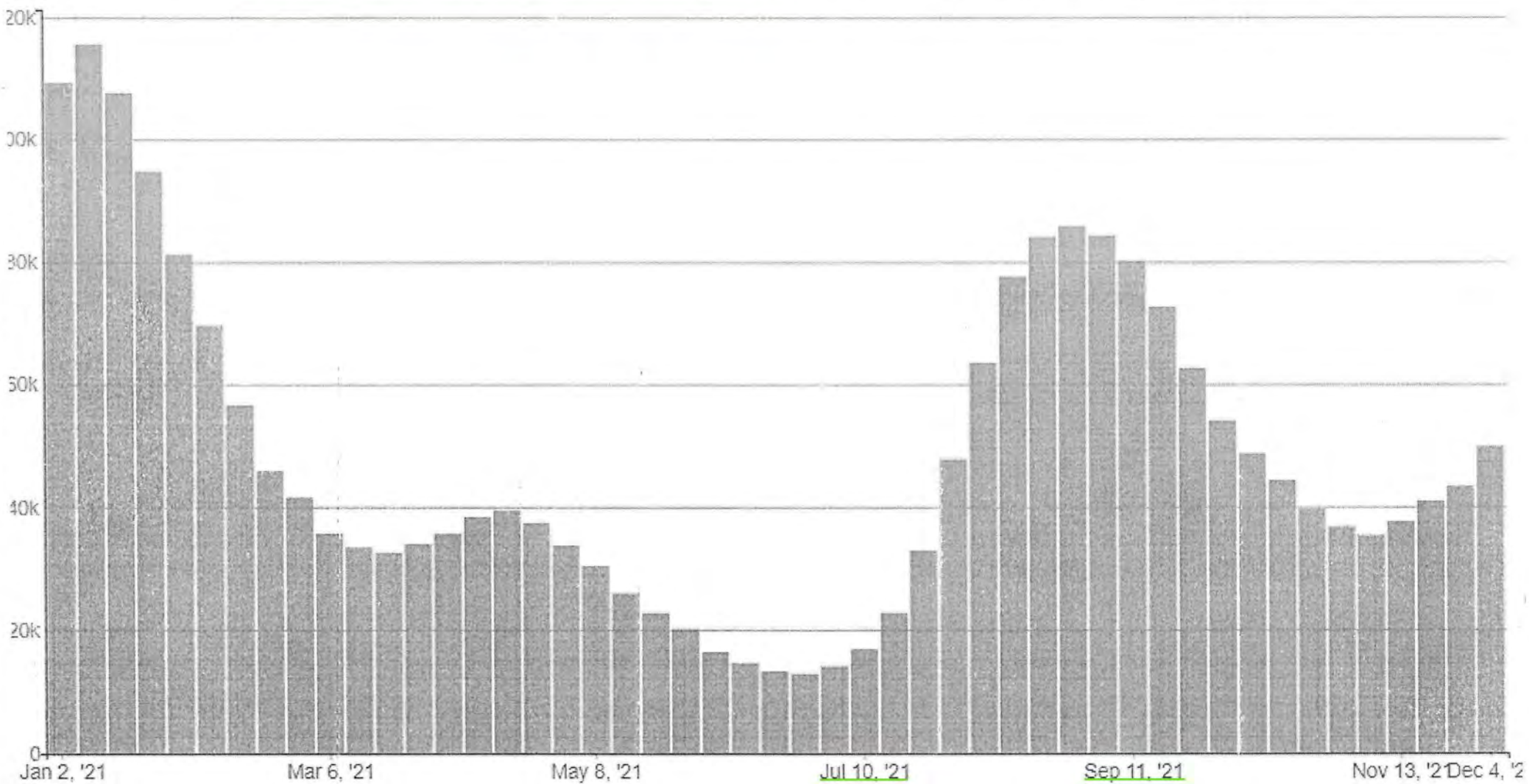
for Disease Control and Prevention, COVID Data Tracker. Atlanta, GA: U.S. Department of Health and Human Services, CDC; 2023, November 08. <https://covid.cdc.gov/covid-data->

Currently Hospitalized Patients with Confirmed COVID-19, by Week, in The United States, Reported to CDC



or Disease Control and Prevention. COVID Data Tracker. Atlanta, GA: U.S. Department of Health and Human Services, CDC; 2023, November 08. <https://covid.cdc.gov/covid-data->

COVID-19 New Hospital Admissions, by Week, in The United States, Reported to CDC



for Disease Control and Prevention. COVID Data Tracker. Atlanta, GA: U.S. Department of Health and Human Services, CDC; 2023, November 08. <https://covid.cdc.gov/covid-data->



# **EXHIBIT 104**

**From:** Jones, Zachery - LR [Zachery.Jones@united.com]  
**Sent:** 11/16/2021 9:39:20 AM  
**To:** Hansen, Mike [mike.hansen@united.com]; Reardon, Thomas - LR [thomas.reardon@united.com]; Cooney, Julianne [Julianne.Cooney@united.com]; Mennel, Eric [Eric.Mennel@united.com]; Nau, Sarah [sarah.nau@united.com]; Krabbe, Bob [Bob.Krabbe@united.com]  
**Subject:** FW: Mask Policy

# Redacted - Privileged

**From:** Hodges, Michelle <Michelle.Hodges@united.com>  
**Sent:** Tuesday, November 16, 2021 9:31 AM  
**To:** Nettles, Beth <Beth.Nettles@united.com>  
**Cc:** Jones, Zachery - LR <Zachery.Jones@united.com>  
**Subject:** FW: Mask Policy

Hey Beth – can we connect on this at some point today? Zachery sent a note and suggested “DRP should come with a uniformed recommendation such as rolling everyone back to a verbal warning or clean slate” and I completely agree if we can make that work.

**From:** Gebo, Kate <Kate.Gebo@united.com>  
**Sent:** Tuesday, November 16, 2021 8:13 AM  
**To:** Hodges, Michelle <Michelle.Hodges@united.com>; Jones, Zachery - LR <Zachery.Jones@united.com>  
**Subject:** Mask Policy

Hi Michelle and Zachery  
Thanks for the updated mask policy. I wanted to check to see if we have removed discipline from everyone who has been vaccinated but has a mask warning in the record. I'd like to do that given where we are with masks and vaccinations. Let me know if that is possible.  
Kate

**Kate Gebo** (*she/her/hers*)  
Executive Vice President Human Resources and Labor Relations  
Executive Sponsor EQUAL

United | Corporate Support Center | 233 S. Wacker Drive, 11th Floor | Chicago, IL 60606  
Tel 872-825-8603 | [kate.gebo@united.com](mailto:kate.gebo@united.com)  
[united.com](http://united.com)



# **EXHIBIT 105**



APP.575<sub>1</sub>



### United Airlines' Leaders in Health and Safety

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**Pat Baylis**  
Managing Director and  
Corporate Medical Director



**Sasha Johnson**  
Vice President  
Corporate Safety

UNITED  2

APP.576<sub>2</sub>

### Corporate Medical Director role shifted during the pandemic

Coordinating with key health organizations



As information became available, focus on educating and establishing guidelines to mitigate risks

- Educate team about symptoms and what to look for
- Secure protective equipment including masks and gloves for frontline employees
- Develop and institute social distancing measures
- Establish quarantine guidelines for employees who are exposed at work
- Ensure our employees and their families have the right resources

UNITED 3

## United CleanPlus teams our airline with experts at Clorox and Cleveland Clinic

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United CleanPlus is our commitment to delivering industry-leading cleanliness, plus putting health and safety at the forefront of our entire customer experience

We have teamed up with the experts at Clorox and Cleveland Clinic to raise the bar in delivering a healthier travel experience



UNITED  4

APP.578<sub>4</sub>

### Key United CleanPlus policy changes

#### Mandatory mask policy



United was the first U.S. carrier to mandate masks for flight attendants, quickly following with all customers and employees onboard and across airport facilities

#### Health Assessment



United was the first major U.S. airline to require all passengers to complete a health self-assessment during their check-in process

#### COVID-19 Testing



United was the first major U.S. carrier to announce COVID-19 tests for customers flying to Hawaii. As a trusted testing partner of the Hawaii Dept. of Health, passengers can bypass quarantine requirements with a negative test result



## Key United CleanPlus policy changes

### Clorox Products



Rolled out Clorox Total 360 sprayers across numerous stations, regularly spraying high traffic areas including lobbies, gate areas, clubs, baggage claims and employee work spaces

### Innovative Cleaning



Introduced new onboard cleaning procedures including UVC blades to clean flight deck and spraying antimicrobial coatings across our fleet of aircraft

### Technology Advancements



United's Digital team developed a first of its kind touchless-capable kiosk now in 230+ stations worldwide and a new chat function, the United Automated Assistant

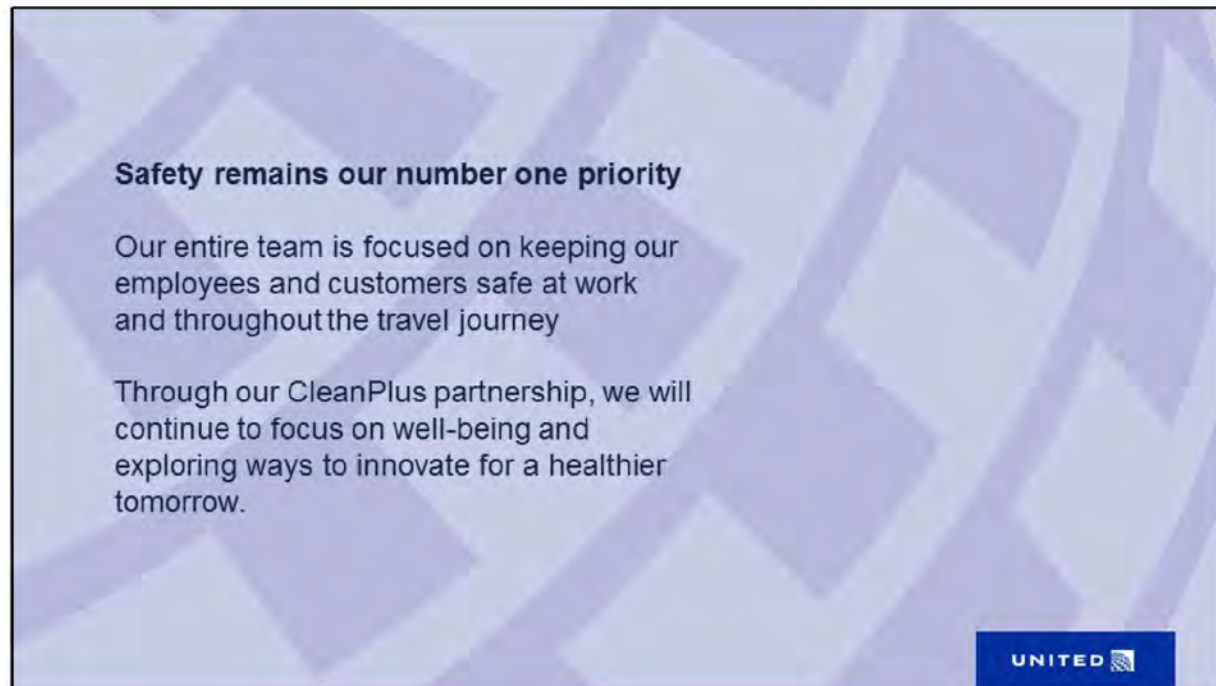
**United works with U.S. Dept. of Defense on air flow study that showed filtration systems make plane cabin one of the safest indoor environments in the world**



HEPA Filter  
removes  
**99.97%**  
of particles  
like viruses  
and bacteria



UNITED 7



# **EXHIBIT 106**



LOI Meeting with Alyse Medlin (u302871)      March 9, 2022

In Attendance:

Alyse Medlin                      Erin Holland – DENSW IFS

Rich Otey – DENSW IFS Notetaker

Meeting began at 10:00

EH –

Did you reach out to the AFA to have a representative present for today's meeting?

AM -

No, I did not.

EH –

We can postpone the meeting until tomorrow if you want to reach out to the AFA to have them present on the call with you.

AM –

I can't do the call tomorrow so we can just go ahead with the meeting.

EH –

I have to ask, are you declining AFA union representation?

AM –

Yes, I am declining union representation.

EH –

Ok, you are returning from maternity leave and are not vaccinated. Did you receive the documents I sent you regarding the United vaccination and safety policies?

AM –

Yes, I did.

EH –

Are you currently vaccinated?

AM –

No. I had put in for an exemption.

EH –

Was your exemption accepted?

AM –

No.

EH –

The results of this investigation show that you are not in compliance with the United Vaccination Policy so I am terminating your employment with United Airlines effective today.

AM –

Can I put in for the other exemption?

EH –

You would have had to put it in before you were returned to work from your maternity leave.  
Which exemption did you request?

AM –

Religious.

EH –

And it was declined?

AM –

Yes, they wanted a 3<sup>rd</sup> letter and I was unable to get that letter.

EH –

Ok. At this time, I am moving forward with termination. I will be sending you a termination letter that will advise you on how to return your duty items and the appeal process if you are interested in appealing my decision. Do you have any other questions or anything else you would like to add at this time?

AM –

No, no questions at all.

EH –

This will conclude our meeting at this time. Thank you for your time.

**Meeting Ended**



March 9, 2022

**APP.585**

UNITED\_SAMBRANO\_00162640

# **EXHIBIT 107**

**THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

**DAVID SAMBRANO, *et al.*, individually,  
and on behalf of all others similarly situated,**

**Plaintiffs,**

**v.**

**UNITED AIRLINES, INC.,**

**Defendant.**

§  
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§  
§  
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§  
§  
§  
§

**Civil Action No.**

**4:21-CV-01074-P**

**UNITED AIRLINES, INC.’S OBJECTIONS AND RESPONSES TO  
PLAINTIFFS’ FIRST SET OF INTERROGATORIES**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Defendant United Airlines, Inc. (“United”) provides the following objections and responses to Plaintiffs’ First Set of Interrogatories (“Interrogatories”) as follows:

**OBJECTIONS TO INSTRUCTIONS**

1. United objects to Instructions Nos. 3 and 4 as it imposes obligations beyond those required by the Federal Rules of Civil Procedure, the Local Rules of the Northern District of Texas, and any orders that have been or will be entered in this case (collectively, the “Discovery Rules”). United will produce a reasonable and appropriate privilege log in compliance with the Discovery Rules that identifies any documents withheld from production based on attorney-client and/or work product privileges.

2. United objects to Instruction No. 6 as it imposes obligations beyond those set forth in the Discovery Rules. United will supplement its responses as appropriate and in accordance with the Discovery Rules.



3. United objects to Instruction No. 7 as it imposes obligations beyond those set forth in the Discovery Rules. For documents that United does not produce, in whole or in part, United will not “state the name and address of each person who you believe has custody, possession, or control of the document.”

4. United objects to Instruction No. 8. United will provide responses to these Requests limited to the time period January 1, 2020, through February 9, 2023 (the “Relevant Time Period”).

5. United objects to these Interrogatories to the extent they seek electronically stored or other information from sources that are not reasonably accessible because of undue burden or cost. United will not search sources that are not reasonably accessible.

6. United objects to these Interrogatories on the grounds that they are compound, contain multiple subparts, and therefore exceed the 25 interrogatory limit set forth in Fed. R. Civ. P. 33(a)(1).

7. United’s failure to object to these Interrogatories or to any specific Interrogatory on a particular ground shall not be construed as or deemed to be any type of waiver of United’s right to object on any additional ground.

8. The fact that a response is provided to any Interrogatory does not constitute a representation by United that responsive documents or information exist.

### **RESPONSES TO INTERROGATORIES**

**INTERROGATORY NO. 1:** Describe the process by which the Vaccine Mandate was developed, including the dates when the Mandate was initially considered, as well as the name, position, and role of each person who was involved in developing the Mandate, the reasonable accommodation request process, and the process for reviewing and analyzing the sincerity or adequacy of an employee’s religious or medical bases for requesting an accommodation to the Mandate.

**RESPONSE:** United objects to Interrogatory No. 1 as overly broad and unduly burdensome to the extent it seeks information regarding “each person” involved in at least three related but distinct

contraindication for receiving a COVID-19 vaccination based on information provided by the individual's doctor and guidance issued by the Centers for Disease Control and Prevention ("CDC"). United considered whether the individual's doctor and/or CDC guidance stated that COVID-19 vaccination was contraindicated when deciding whether to grant a request for a medical accommodation. While there were no COVID-19 vaccination specific training materials, the medical review team worked closely with one another to ensure that each member of the team was consistently applying the same criteria across individual accommodation reviews. United did not, as part of this process, limit exemptions to those individuals whose requests may have been based on a "disability" within the meaning of the Americans with Disabilities Act and did not concede or otherwise indicate that the decision to grant an accommodation was based on a conclusion that the individual was disabled. United further states that with respect to review of religious accommodation requests it followed the process set forth in response to Interrogatory No. 5.

**INTERROGATORY NO. 5:** Describe the process United used to determine the sincerity of religious exemption requests, including the reason for and timing of the change in process from requiring a pastoral letter to a third-party letter, how that change in process was communicated to employees, and whether any such letters (pastoral or third-party) have been required in the past for religious accommodation requests concerning United's other policies aside from the Vaccine Mandate.

**RESPONSE:** The United accommodation review team analyzed each accommodation request on an individual basis. When United began receiving requests for religious accommodations to its COVID-19 vaccination policy, it initially asked employees a series of follow up questions about their religious beliefs and practices, including questions regarding medications used, other vaccines taken, etc. However, in light of the volume of requests that United received—in total approximately 5,100 religious and medical requests—United realized that the process for evaluating religious accommodations to the COVID-19 policy was too onerous for both its employees requesting accommodations and those reviewing the requests. Thus instead, United granted religious accommodations to individuals who (1) articulated a religious belief that prevented them from being vaccinated against COVID-19 and (2) provided an attestation from a third party (e.g., friend, family

member, coworker, etc.) as to that belief. For a period of only a few days, United requested employees provide a letter from a pastor or other religious leader. However, United changed the requirement to a third party letter when it realized that it could be difficult for employees to obtain a letter from a religious figure specifically. The change regarding the third party letter was communicated to employees through Help Hub. With respect to the more detailed questions United had initially asked regarding individual's religious beliefs, United did not rely on responses to those questions when determining whether to grant an accommodation and instead only applied the requirement of an articulated religious belief and a third party attestation. United further states that outside of the COVID-19 accommodation context it has requested, on a case-by-case basis, a third party letter attesting to an employee's religious beliefs as part of the process of considering that employee's religious accommodation request.

**INTERROGATORY NO. 6:** Describe the process United used to determine whether to grant a medical accommodation, including the decision to demand medical certifications from certain employees, and the basis for the policy that those seeking medical accommodations should be treated differently from those seeking religious accommodations, including documents explaining that policy.

**RESPONSE:** United objects to Interrogatory No. 6 based on its use of the phrase "the decision to demand medical certifications." United incorporates its response to Interrogatory No. 4. Medical and religious accommodation requests regarding United's COVID-19 vaccination policy were evaluated differently due to the different nature of the requests. Religious sincerity is not the same as medical need, and so United applied different protocols to evaluate each type of request.

**INTERROGATORY NO. 7:** For all accommodations offered to the Vaccine Mandate, identify the name and position of the person or group who decided how to accommodate United employees with a religious or medical exemption and whether that person was involved in the accommodation decisions to the Vaccine Mandate before or after September 19, 2021.

**RESPONSE:** United objects to Interrogatory No. 7 as overly broad and unduly burdensome to the

Dated: May 1, 2023

Respectfully submitted,

/s/ Russell D. Cawyer

Donald J. Munro  
D.C. Bar No. 453600  
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51 Louisiana Avenue, NW  
Washington, DC 20001  
Telephone: (202) 879-3939  
Facsimile: (202) 626-1700  
Email: dmunro@jonesday.com

Russell D. Cawyer  
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Taylor J. Winn  
State Bar No. 24115960  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served via e-mail to all counsel of record this 1st day of May, 2023.

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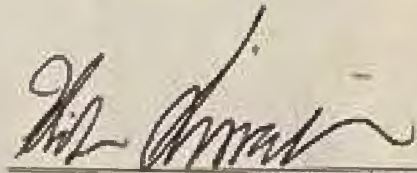
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Russell D. Cawyer

**VERIFICATION**

I, Kirk Limacher, Vice President, FO Planning & Development for United Airlines, Inc., hereby state that I have reviewed United Airlines, Inc.'s Objections and Responses to Plaintiffs' First Set of Interrogatories and affirm that the facts contained therein are true and correct to the best of my knowledge, information, and belief. This affirmation is based in part upon my personal knowledge. For matters that are not within my personal knowledge, I am satisfied that a reasonable inquiry has been made and that these responses contain true and correct information. I verify under penalty of perjury that the foregoing is true and correct.



Kirk Limacher

**SUBSCRIBED AND SWORN** to before me on this \_\_\_\_ day of \_\_\_\_, 2023, by Kirk Limacher.

\_\_\_\_\_  
Notary Public

My commission expires:

\_\_\_\_\_

# **EXHIBIT 108**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

DAVID SAMBRANO, ET AL ) CASE NO. 4:21-CV-01074-P  
)  
) FORT WORTH, TEXAS  
vs. )  
) OCTOBER 13, 2021  
UNITED AIRLINES, INC. ) 10:00 A.M.

VOLUME 2 OF 3  
TRANSCRIPT OF PRELIMINARY INJUNCTION  
BEFORE THE HONORABLE MARK T. PITTMAN  
UNITED STATES DISTRICT COURT JUDGE

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Proceedings reported by mechanical stenography, transcript  
produced by computer.

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David Castillo 86,99 95,101 2

Genise Kincannon 103,119 113 2

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Defendant's Witnesses Direct Cross Voir Dire

William Kirk Limacher 155,216 184,217 2

Aleksandra Johnson 219,254 235 2

Bryan Quigley 256,273 265 2

Steven Lukasik 276 286 2

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environment, that is an environment that is almost exclusively United employees, where we do have greater control. There is more of a supervisor/managerial presence to -- to monitor the accommodation.

And then the third group, obviously a fully virtual existence does not put an unvaccinated individual into the workplace.

O. Now, let's talk for a second about customer-facing employees. What accommodations did United initially offer to its customer-facing employees?

A. The accommodation initially offered and communicated was an unpaid leave, either an unpaid medical or temporary unpaid personal leave. Both were communicated as temporary until pandemic conditions meaningfully receded.

O. And what does "meaningful recede" mean?

A. We have yet to define a specific metric and we're actively working on that. Under advice from the CDC, as well as the Cleveland Clinic, I was --

THE COURT: So, you don't know the answer to that; is that fair to say? You don't know what "meaningful" means based on your answer?

THE WITNESS: Sir, we have not established a metric yet.

THE COURT: So, in other words, you don't know, as you're sitting here, what "meaningful" means; is that correct?

1 Because that's what I've heard twice. Give me -- give me --  
2 you don't have to try to weasel out.

3 THE WITNESS: Your Honor, I was just going to help  
4 to define what we were currently doing.

5 THE COURT: You don't have an answer for what  
6 "meaningful" means as we're sitting here today, correct?

7 THE WITNESS: Correct.

8 THE COURT: All right. Thank you.

9 Q. (By Ms. Matthews) And have the accommodations available  
10 to customer-facing employees changed since United first  
11 announced the accommodation?

12 A. Yes.

13 Q. How have they changed?

14 A. So for our customer-facing CSRs, we have a new solution  
15 that we've rolled out called agent on demand. What that  
16 allows us to do is take a trained customer service  
17 representative and put them into a virtual setting where  
18 they're able to provide customer service through a customer's  
19 cell phone but in a noncustomer-facing setting. So, in the  
20 airport, but in an office setting where we can maintain better  
21 control over safety, cleanliness, etc.

22 That solution has now, as of earlier this week, been  
23 rolled out into six pilot stations and we plan to expand from  
24 there.

25 Q. Now, as I think you heard, there's been a lot of



REPORTER'S CERTIFICATE

I, Monica Willenburg Guzman, CSR, RPR, certify  
that the foregoing is a true and correct transcript from  
the record of proceedings in the foregoing entitled matter.

Further, the proceedings were held during the  
COVID-19 Pandemic and parties, including witnesses, were  
speaking while wearing masks.

I further certify that the transcript fees format  
comply with those prescribed by the Court and the Judicial  
Conference of the United States.

Signed this 23rd day of October, 2021.

/s/Monica Willenburg Guzman  
Monica Willenburg Guzman, CSR, RPR  
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# **EXHIBIT 109**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

§ CIVIL ACTION

UNITED AIRLINES, INC.,                   §  
Defendant.                                 §

ORAL AND VIDEOTAPED DEPOSITION OF  
DOUGLAS BEYER  
OCTOBER 23, 2023

ORAL AND VIDEOTAPED DEPOSITION of DOUGLAS BEYER,  
produced as a witness at the instance of the Plaintiff(s)  
and duly sworn, was taken in the above-styled and  
numbered cause on October 23, 2023, from 9:30 a.m. to  
12:26 p.m., before Molly Carter, Certified Shorthand  
Reporter in and for the State of Texas, reported by  
machine shorthand, at the offices of Kelly Hart &  
Hallman, LLP, 303 Colorado St, Suite 2000, Austin, Texas,  
pursuant to the Federal Rules of Civil Procedure.

1           A     Like on a one-on-one situation?

2           Q     Yes. Or any United employee that you've  
3 disclosed your religious beliefs to.

4           A     No, I haven't had -- I haven't had any bad  
5 blowback from anybody on that. People are generally  
6 relatively respectful.

7           Q     So no harassment or discrimination about that?

8           A     I think I remember, just coming back, there's  
9 maybe one or two people expressed -- I wouldn't say --  
10 they didn't let their hostility come through too much,  
11 but you could tell that they -- they were expressing  
12 unhappiness with people coming back.

13          Q     When you say "people coming back," you mean --

14          A     People who had gotten religious or medical  
15 exemptions coming back if they hadn't taken the COVID  
16 vaccine.

17          Q     This is when you came back from unpaid leave?

18          A     Right. Right.

19          Q     Do you remember who those individuals were?

20          A     No, I couldn't tell you who that was.

21          Q     And this was to you personally?

22          A     Yes. It was -- you know, it's either just me  
23 or maybe one other person in the cockpit. We're all  
24 talking, and generally I'm just listening, to hear what  
25 the, what's going on. I try not to divulge anything,



1 but -- especially since there's this whole thing going on  
2 in the legal system right now. But just listening to  
3 some people just express a little bit of reservations,  
4 let's just say.

5 Q Okay. Do they know that you were unvaccinated?

6 A I think I only -- when I first came back, I  
7 indicated -- I didn't flat out say that I didn't take it,  
8 but I just -- you know, when the conversation came to  
9 people who hadn't taken the shot and people said, "Yeah,  
10 you know, I hear these people are coming back," and  
11 I'm -- I know specifically to one person I went like this  
12 (indicating), and she says, "Oh, you're one of them?" I  
13 said --

14 Q And just for the record you're pointing your  
15 thumb at yourself?

16 A Pointing my thumb, yes.

17 Q Indicating that you --

18 A Right.

19 Q So you were letting these people know you were  
20 one of the --

21 A Yeah. But that was right -- way early on. And  
22 since then, really I think it was only one or two people  
23 that I indicated -- I didn't actually say anything  
24 specific, just indicated.

25 Q What was the response when you let them know

1 that you were one of the unvaccinated returning to work?

2 A Well, one person I remember specifically was  
3 actually quite thankful for people like us. They didn't  
4 want to take the vaccination and they did anyway. They  
5 felt under duress, and even expressed to me that they  
6 wished they hadn't. And, and the other person was just  
7 kind of surprised.

8 And I also remember people showing -- I'm not  
9 on social media at all, but people showing me -- not even  
10 anonymously. There's people whose, you know, picture and  
11 name are on their social media thing that are openly  
12 hostile about unvaccinated coming back to work. And it's  
13 very specifically expressing that they hoped none of us  
14 would ever come back. But --

15 Q Do you remember any names of the individuals  
16 posting these things?

17 A No. Like I said, I mean, I'm not on social  
18 media. I couldn't even look it up if I wanted to.  
19 Wouldn't even know how.

20 Q Do you remember what platform it was on?

21 A I'm thinking it was probably Facebook, because  
22 I hear people say Facebook a whole lot, Facebook forum or  
23 whatever.

24 Q Who showed you that?

25 A Oh, there's been several people that have

1 A No.

2 Q Have you told any United employees that you  
3 filed a Charge of Discrimination against the company?

4 A I don't remember telling anybody that, no.

5 Q From August 6th of 2021 to August 25th, 2021,  
6 with the 25th being the date that you submitted your  
7 request for accommodation, did you have any contact or  
8 communication with any United managers or supervisors or  
9 HR reps that was not in writing?

10 A I don't think so. No. I remember trying to do  
11 everything through the HelpHub.

12 Q Okay.

13 A And not ever being able to talk with anybody.

14 Q Okay. This is --

15 A When you say United management, are you  
16 including any union representation in that too or is  
17 that --

18 Q Sure.

19 A Because I did try to talk to our union rep,  
20 and --

21 Q Okay.

22 A -- was specifically told that's between you and  
23 the company.

24 Q Who did you reach out to at the union?

25 A That would have been our LEC chairman, the

1           Q     What's the purpose of your 12:40 communication?

2           A     They were -- I felt like they were trying to  
3     just -- well, first of all, it felt very condescending,  
4     extremely rude. And I'm trying to get them to understand  
5     that they were behaving that way.

6           Q     And your complaint is that it's an overly  
7     aggressive demand for an answer in only three days,  
8     correct?

9           A     Correct.

10          Q     And then 2 minutes later you provide a response  
11     with the information requested?

12          A     That's correct, but I also, in that first one,  
13     said that there's some people that probably won't be able  
14     to respond in that amount of time. You know, some people  
15     are flying. Some people are on long haul flights. Some  
16     people are -- you know, they land and they're extremely  
17     tired. You know, telling you you only have three days,  
18     it just seemed --

19          Q     Do you know of anybody that expressed an  
20     inability to meet this three-day turnaround?

21          A     I don't know for certain if anybody did or not.

22          Q     So that statement, some of us may not be able  
23     to respond in that short of a time, is that just your own  
24     conjecture of what might be happening around the company?

25          A     Yes. I'm just thinking in my own



1           A     It's not so much an opposition to that. It's  
2     just that there seemed like there was a lot more  
3     reasonable things they could have done, such as the  
4     masking and the testing, and seeing that other airlines  
5     were flying people to countries that United was  
6     forbidding us from going to. And, you know, those people  
7     were unvaccinated also with these other airlines, so it  
8     just didn't seem reasonable to just put us out on the  
9     street.

10          Q     I'd like to unpack some of these instances of  
11     harassment that you've identified. The first, you  
12     mention a cajoling to take the vaccine. Who was, who was  
13     cajoling you? Who was ribbing you and trying to get you  
14     to take the vaccine?

15          A     Well, I'd say mostly it was the leadership,  
16     whether it's, you know, fully from the top of the company  
17     on down to leadership in San Francisco who were just  
18     sending out company bulletins and emails and -- it  
19     basically felt like a bombardment of daily, it seemed  
20     like, several communications telling you that you needed  
21     to do this.

22                And of course, you know, there's some people  
23     that you work with too that would look at you funny or,  
24     you know, say something if they knew that you didn't have  
25     the vaccine yet or if you were not going to take it. You

1 know, it was coming from all sides.

2 Q These communications that came from leadership,  
3 were those directed towards your religious beliefs or  
4 were they directed towards your vaccination status?

5 A They made it mostly sound towards your  
6 vaccination status. But like I said, you know, that  
7 video with Scott Kirby, he very specifically addressed  
8 the religious accommodation. And that's straight from  
9 the top.

10 Q Any of the individuals that participated in  
11 this kind of behavior identify your religion, or was this  
12 also regarding your vaccination status?

13 A I think it was pretty much they didn't care  
14 about much else other than the vaccination status.

15 Q Okay. The emails and bulletins that you  
16 reference from leadership regarding your vaccination  
17 status, what was the content of these messages? What  
18 were they sending out?

19 A They were just basically telling you to upload  
20 your vaccination status, your vaccination card on  
21 whatever portal they had. I don't even know because I  
22 never looked it up. But you had to do it by a certain  
23 date; otherwise, you either had to have the medical or  
24 the religious accommodation.

25 They were, they were pretty careful about how

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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

DAVID SAMBRANO, et al.,                   §  
individually, and on behalf of §  
all others similarly situated, §  
Plaintiff,                                   §  
   §   CIVIL ACTION  
VS.   §   NO. 4:21-CV-01074-P  
   §  
UNITED AIRLINES, INC.,                   §  
Defendant.                                 §

- - - - -

REPORTER'S CERTIFICATION

ORAL DEPOSITION OF DOUGLAS BEYER

OCTOBER 23, 2023

- - - - -

I, MOLLY CARTER, Certified Shorthand Reporter in and  
for The State of Texas, hereby certify to the following:

That the witness, DOUGLAS BEYER, was duly sworn by  
the officer and that the transcript of the oral  
deposition is a true record of the testimony given by the  
witness;

I further certify that pursuant to FRCP Rule  
30(e)(1), that the signature of the deponent:

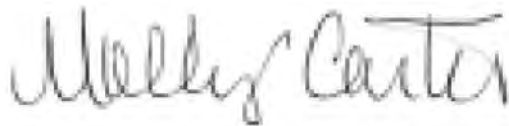
\_\_\_\_\_ was requested by the deponent or a party before  
the completion of the deposition and returned within 30  
days from date of receipt of the transcript. If  
returned, the attached Changes and Signature Page

1 contains any changes and the reasons therefor;

2 \_XX\_ was not requested by the deponent or a party  
3 before the completion of the deposition.

4 I further certify that I am neither attorney nor  
5 counsel for, related to, nor employed by any of the  
6 parties to the action in which this testimony was taken.  
7 Further, I am not a relative or employee of any attorney  
8 of record in this cause, nor do I have a financial  
9 interest in the action.

10 Certified to by me on this 27th day of October 2023.

11  
12  
13  
14 

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# **EXHIBIT 110**

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION  
DAVID SAMBRANO, et al., )  
individually, and on )  
behalf of all others )  
similarly situated, )  
 ) Civil Action No.  
Plaintiffs, ) 4:21-cv-01074-P  
 )  
v. )  
 )  
UNITED AIRLINES, INC., )  
 )  
Defendant. )

\*\*\*\*\*

ORAL AND VIDEOTAPED DEPOSITION OF  
CHARLES BURK  
SEPTEMBER 12, 2023

\*\*\*\*\*

ORAL AND VIDEOTAPED DEPOSITION OF CHARLES BURK,  
produced as a witness at the instance of the Defendant,  
and duly sworn, was taken in the above-styled and  
numbered cause on the 12th day of September, 2023, from  
9:30 a.m. to 5:20 p.m., before Julie C. Brandt, RMR,  
CRR, and CSR in and for the State of Texas, reported by  
machine shorthand at Kelly Hart & Hallman, LLP, 201 Main  
Street, Suite 2500, Fort Worth, Texas, pursuant to the  
Federal Rules of Civil Procedure and the provisions  
stated on the record or attached hereto.

1           Q.   Okay. Exhibit 12 is an email from Help Hub on  
2           September 9th to you that says, Dear Charles, you  
3           submitted a religious reasonable accommodation request  
4           and it has been approved. Right?

5           A.   Yes.

6           Q.   Do you remember receiving that on or about  
7           September 9th?

8           A.   Yes, I do.

9           Q.   And Exhibit 13 is an HR communication, again,  
10          to you on September 13, and it says, We received your  
11          request for reasonable accommodation for the COVID-19  
12          vaccine mandate and your request has been approved. You  
13          received a communication from Help Hub in the last few  
14          days asking you to either accept or withdraw your  
15          accommodation request within five calendar days. As of  
16          this afternoon, we have not received your confirmation.

17                Then it asks you to take action. Did I read  
18          that correctly?

19          A.   Yeah.

20          Q.   Do you remember receiving that on or about  
21          September 13?

22          A.   I think so, yeah.

23          Q.   So and then you're forwarding both these  
24          Exhibit 12 and 13 to yourself from your United account  
25          to your Gmail account --

1           A.     It was end of October, early November.

2           Q.     If I said October 31st, does that sound about  
3     right?

4           A.     It sounds about right, yeah.

5           Q.     And as a result of getting vaccinated, you  
6     withdrew your religious RAP request, right?

7           A.     I believe it was automatic, yes.

8           Q.     Why did you decide to get vaccinated and  
9     withdraw your RAP request?

10          A.     So when the mandate came down, I had no desire  
11     to get vaccinated. There was no -- like, that was my  
12     position at the beginning. And there was a timeframe  
13     early on, I think it was like less than a week, and I  
14     thought -- or not less than a week, at the end of the  
15     month. And so I thought that there initially might be  
16     some accommodation from -- from United about another  
17     opportunity or --

18                 You know, we had all these premandate  
19     protocols that were -- I had been flying through the  
20     pandemic. We had -- we were given testing. We were  
21     wearing masks. We were doing all the things we were  
22     supposed to do. So it didn't really make sense to me  
23     that they would just completely, you know, one option  
24     or termination, or ultimately unpaid leave for an  
25     indefinite period of time is what resolved it to. So



1     that didn't happen, and then there was a coercion from  
2     the company. It was just one way. It was one option,  
3     get vaccinated or go on unpaid leave for an indefinite  
4     period of time.

5             And so at the beginning, you know, I felt like  
6     I had options, and as things closed down toward the end,  
7     I had -- I had personal financial stresses in my life.  
8     I have my marriage, my kids are in school, and  
9     ultimately -- and we have a small family business in  
10    Montana and a farm that I'm not -- that my mom  
11    maintained. And then my mother was -- fell ill at the  
12    end of August, so this was early September, and ended up  
13    in the hospital and then in a nursing home.

14            And so ultimately, you know, the pressure  
15    built to the point where it was my full financial  
16    responsibility to take care of everything. I think I  
17    wrote a check at the nursing home for like \$20,000 for a  
18    month or -- I don't know if it was exactly a month or a  
19    couple months, but it was a large check. My mom wasn't  
20    doing well, and I just felt the pressure, and I violated  
21    my faith and I took the vaccine for the job.

22            Q.     You mentioned that your mother was sick, and  
23                    I'm very sorry for that. What was she sick with?

24            A.     Well, she went to the hospital at the  
25                    beginning of -- very beginning of September. She always

1 to report workplace concerns about harassment and  
2 discrimination?

3 A. Vaguely. I don't -- I'm not -- vaguely.

4 Q. Prior to 2021, did you ever report any  
5 discrimination or harassment?

6 A. No.

7 Q. As a result of the COVID-19 vaccine policy,  
8 did you experience any discrimination?

9 A. State the question again, please.

10 Q. Uh-huh.

11 So as a result of United's COVID-19 vaccine  
12 policy, which includes your accommodation, did you  
13 experience any discrimination?

14 A. I believe I did, yes.

15 Q. How?

16 A. So United -- I feel like United singled us  
17 out, and they put us in a group.

18 Q. I'm sorry, I don't mean to interrupt. Just  
19 who is us? So you said I feel like United singled us  
20 out. Who is us?

21 A. Like, I'm referring to, like, a religious  
22 accommodation like me. Let me just say, they singled me  
23 out because of -- I didn't want to get the vaccine for  
24 religious reason, and there was -- and they treated us  
25 separately. Like, we had this premandate. We had all

1 these protocols at the airline that allowed us to fly  
2 airplanes around the globe, which I did a lot, and that  
3 they were essentially taking my livelihood away because  
4 I didn't -- I chose not to do something for a religious  
5 person -- purpose.

6 And I was threatened by the CEO of United  
7 Airlines that -- from my recollection, what he said was  
8 that you're putting your job on the line, as if I'm  
9 going to make up my religious belief. They coerced us  
10 with money. You know, they offered money. They -- what  
11 they are essentially saying was -- I'm a copilot. I'm  
12 sitting right here, and the captain is right over here.  
13 I can touch him on the shoulder. So we have to be  
14 vaccinated, but the people don't have to be vaccinated.  
15 We walk through the terminal. We don't know who's  
16 vaccinated or not. We don't -- you know, the claim was  
17 these HEPA filters on the airplane are amazing. They're  
18 cleaner than -- cleaner than a surgery room.

19 So, to me, it would have -- I thought, for  
20 example, well, if I'm going to fly to Guam, which we  
21 were doing a lot of Guam cargo flying, and the  
22 government in Guam and the governor said, hey, you can't  
23 come on this island unless you're vaccinated. I'm not  
24 objecting to that. What I'm saying is, okay, I'm not  
25 expecting United to pay me to do something that I'm not

1 doing, but there could have been an accommodation where  
2 I could have stepped to another airplane or flown a  
3 smaller airplane potentially to fly around the United  
4 States instead of doing the international flying, as an  
5 example.

6 The other thing that is arbitrary, there's --  
7 right here is where -- when we fly international, we fly  
8 with augmented pilots. So if I'm in the right seat of  
9 a jet, the captain is here. He and I have to be  
10 vaccinated. This guy, that's literally 18 inches from  
11 my face, is a crew member. Well, that guy then has to  
12 be -- you know, if he's operating a flight and we're  
13 going long range and there's a guy right behind me, we  
14 all have to be vaccinated. But yet, if this person is  
15 an American Airlines jumpseater, well, they don't have  
16 to be vaccinated and they can ride right there in the  
17 cockpit.

18 So that, to me, is arbitrary. It's singling  
19 me out. It's taking my livelihood away and my  
20 ability -- you know, I have a contract with United. I  
21 fly airplanes and they pay me for it based on a union  
22 contract. It's kind of simple. And this arbitrary  
23 nature, to me, was -- I felt like I was discriminated  
24 against because I didn't want to do something because I  
25 had a religious belief to do it.



1           Q.    Right.

2                   So do you think that you were discriminated  
3 against before or after you got vaccinated?

4           A.    Before.   Before.   I mean, that's -- that's --  
5 you know, the fact that I violated my faith and took a  
6 vaccine that I didn't really want to take, so.

7           Q.    Okay.   So you were discriminated against,  
8 singled out, because of your religious beliefs, right?

9           A.    That's what I believe, yes.

10          Q.    Can you identify for me any nonreligious  
11 United employee that was treated better than you?

12          A.    Say that again.

13          Q.    Sure.

14                I would like you to identify for me a  
15 nonreligious United employee that was treated better  
16 than you.

17          A.    Look, if -- they kept their job and I didn't.  
18 I wasn't -- I mean, I was forced into a choice.  If  
19 they -- like, I don't control over people.  Like, if  
20 they have -- for whatever their morality is set on, they  
21 can make their own choices, so they complied.  I didn't  
22 want to comply because of my religious beliefs; and so  
23 if they didn't object to taking the vaccine because it  
24 wasn't important to them, well, then they took it and  
25 they kept their job.

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION  
DAVID SAMBRANO, et al., )  
individually, and on )  
behalf of all others )  
similarly situated, )  
 ) Civil Action No.  
Plaintiffs, ) 4:21-cv-01074-P  
 )  
v. )  
 )  
UNITED AIRLINES, INC., )  
 )  
Defendant. )

REPORTER'S CERTIFICATION  
VIDEOTAPED DEPOSITION OF CHARLES BURK  
SEPTEMBER 12, 2023

I, Julie C. Brandt, Certified Shorthand Reporter in  
and for the State of Texas, hereby certify to the  
following:  
That the witness, CHARLES BURK, was duly sworn by  
the officer and that the transcript of the oral  
deposition is a true record of the testimony given by  
the witness;  
Before completion of the deposition, review of the  
transcript [ ] was [X] was not requested. If requested,  
any changes made by the deponent (and provided to the  
reporter) during the period allowed are appended hereto;

1           That the amount of time used by each party at the  
2 deposition is as follows:

3       John C. Sullivan.....00 HOUR(S):00 MINUTE(S)

4       Patrick Beisell.....05 HOUR(S):33 MINUTE(S)

5           That pursuant to information given to the  
6 deposition officer at the time said testimony was taken,  
7 the following includes counsel for all parties of  
8 record:

9       FOR THE PLAINTIFFS:

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23           Patrick J. Beisell

24           Andrew Lee (remote via Zoom)

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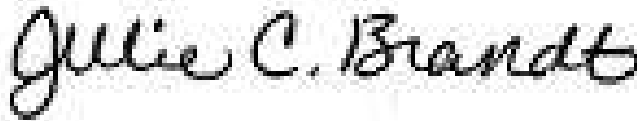
6 -and-

7 Russell D. Cawyer  
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9 201 Main Street, Suite 2500  
10 Fort Worth, Texas 76102  
11 817-878-3562  
12 russell.cawyer@kellyhart.com

13 I further certify that I am neither counsel for,  
14 related to, nor employed by any of the parties or  
15 attorneys in the action in which this proceeding was  
16 taken, and further that I am not financially or  
17 otherwise interested in the outcome of the action.

18 Certified to by me.

19  
20



21 Julie C. Brandt, CSR, RMR, CRR  
22 Texas CSR No. 4018  
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24 Veritext Legal Solutions  
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Fort Worth, Texas 76102  
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# **EXHIBIT 111**

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION  
DAVID SAMBRANO, et al., )  
individually, and on )  
behalf of all others )  
similarly situated, )  
 ) Civil Action No.  
Plaintiffs, ) 4:21-cv-01074-P  
 )  
v. )  
 )  
UNITED AIRLINES, INC., )  
 )  
Defendant. )

\*\*\*\*\*

ORAL AND VIDEOTAPED DEPOSITION OF  
DAVID CASTILLO  
SEPTEMBER 19, 2023

\*\*\*\*\*

ORAL AND VIDEOTAPED DEPOSITION OF DAVID CASTILLO,  
produced as a witness at the instance of the Defendant,  
and duly sworn, was taken in the above-styled and  
numbered cause on the 19th day of September, 2023, from  
9:27 a.m. to 3:27 p.m., before Julie C. Brandt, RMR,  
CRR, and CSR in and for the State of Texas, reported by  
machine shorthand at Kelly Hart & Hallman, LLP, 201 Main  
Street, Suite 2500, Fort Worth, Texas, pursuant to the  
Federal Rules of Civil Procedure and the provisions  
stated on the record or attached hereto.

1 prior to the deadline to submit an accommodation  
2 request?

3 A. It was.

4 Q. Do you remember approximately what date it  
5 was?

6 A. I don't.

7 Q. Did you actually open up Help Hub and attempt  
8 to input information into it?

9 A. I'm not sure if I did or not. I don't recall.

10 Q. Did you attempt to actually hit submit on any  
11 sort of application in Help Hub prior to the deadline?

12 A. I don't recall.

13 Q. Do you recall typing any information into Help  
14 Hub prior to the deadline?

15 A. I don't recall.

16 Q. So it's possible that you never typed anything  
17 into Help Hub prior to the deadline?

18 A. Yeah, it's possible because I didn't -- I  
19 didn't qualify because I didn't have that pastor's note.

20 Q. Did you ever ask your foreperson about the  
21 pastor requirement?

22 A. I didn't.

23 Q. Did you ever ask any United employee about the  
24 pastor requirement?

25 A. No, because I was already discouraged because

1 I tried to get the information through the union and  
2 they wouldn't even give it.

3 And every -- management was referring me to  
4 Help Hub. They weren't answering those questions.  
5 They'd say go to Help Hub for the questions.

6 Q. You asked the union specifically about the  
7 pastor letter requirement?

8 A. I -- I called them and I asked them about the  
9 process, and they didn't know anything about it, and  
10 they referred me to Help Hub.

11 Q. So ultimately, did you submit an accommodation  
12 request?

13 A. Ultimately, I did.

14 Q. Did you submit any request prior to the  
15 deadline to submit one?

16 A. I don't know if I submitted it, anything or  
17 not.

18 Q. You don't know if you submitted anything  
19 before the deadline?

20 A. Prior to the deadline, I went on Help Hub, but  
21 I don't recall whether I submitted anything or not  
22 because of that pastor note problem.

23 Q. When the deadline was approaching, did you  
24 ever reach out to any United employees and say, Hey, I'm  
25 having trouble here, I need to get this on file?



1 Q. When did you do that?

2 A. I believe that was in September of '21.

3 Q. Do you have a copy of that email?

4 A. I don't.

5 Q. Did you ever provide a copy of that email to  
6 your lawyers?

7 A. I didn't.

8 Q. Did you send that email from your United email  
9 address?

10 A. Yeah, I did. I did it on my iPad.

11 Q. And you believe you sent that in September of  
12 2021?

13 A. Yeah, I believe so.

14 Q. Did you receive a response?

15 A. For the religious exemption? I don't believe  
16 so. I don't recall. I mean, I was going to be fired.  
17 We had the legal case going. And then at some point I  
18 was suspended for two days from work, and I was going to  
19 be fired when I went in to a meeting.

20 And since the court case had -- we had already  
21 had one appearance in court and I had mentioned what had  
22 happened to me with Help Hub, as far as not having the  
23 pastor's note and not getting the religious -- being  
24 able to put in for that, and then I was contacted by  
25 United saying that due to those circumstances, that they

1 recognize that there was a problem and that that problem  
2 was corrected and now you just needed a letter. It  
3 didn't have to be from a pastor.

4 But since I hadn't went back on to the system,  
5 I wouldn't have known that. So they were going to give  
6 me an opportunity to then file my religious exemption.  
7 So in my -- the meeting we had for my firing, they said  
8 that they would go ahead and honor that, and I went  
9 ahead and submitted a letter and wrote down my religious  
10 objection, and they sent it in, and then we heard back  
11 in like 15 minutes. They said it was approved.

12 Q. So according to you, you sent an email to your  
13 foreperson in September of 2021 requesting --

14 A. Yeah.

15 Q. -- a religious accommodation, correct?

16 A. Yeah. And it was too late, yeah.

17 Q. Did your foreperson ever respond to your  
18 email?

19 A. The foreman?

20 Q. Yes.

21 A. Yeah. He sent it to whoever it needed to be  
22 sent to.

23 Q. How do you know that?

24 A. He told me.

25 Q. Who did he say he forwarded the email to?

1 talking about that, they're talking about -- so you use  
2 harsh language and then you harm people using  
3 intoxicants, whereas I don't do that. So what I use  
4 alcohol for is during my meditation when I'm in samadhi,  
5 the single-pointed meditation, I will drink. And what  
6 it does is it takes me out of that samadhi, and then I  
7 have to pull my mind back in; and then it takes me out,  
8 and then I pull my mind back in; and then it pulls me  
9 out, and then I put my mind back in. So what I'm doing  
10 is training myself, despite the intoxicant, to actually  
11 keep on pulling myself back into the samadhi.

12 Q. Okay. So you do use alcohol?

13 A. I do use alcohol. I use it for meditation.

14 Q. But in your view, that's not in conflict with  
15 your Buddhist beliefs?

16 A. No, because I'm not out harming people from  
17 using the alcohol, and that's the intent of putting that  
18 in there. I have a reason for doing it.

19 Q. So how does -- how do your Buddhist beliefs  
20 inform your views on abortion?

21 A. Well, I don't -- killing is not something  
22 I'm -- would want, you know, to happen.

23 Q. So in your view, if someone was following  
24 Buddhist principles, they shouldn't get abortions?

25 A. In my view.

1           A.    No, I don't. I would leave that to my foreman  
2   or lead.

3           Q.    Okay. So if you experienced harassment or  
4   discrimination, you would report it to your foreman?

5           A.    Yeah.

6           Q.    As a result of your vaccine policy  
7   accommodation, did you feel that you suffered any  
8   discrimination?

9           A.    Discrimination? Well, I mean, I didn't --  
10   wasn't allowed to go on field trips for overtime. So I  
11   was discriminated against in that regard, not being  
12   allowed to perform certain jobs for overtime.

13          Q.    Okay. Do you feel that you suffered any other  
14   instances of discrimination as a result of receiving an  
15   accommodation?

16          A.    No.

17          Q.    What about harassment?

18          A.    Harass harassment, yes.

19          Q.    Okay. Can you tell me about instances of  
20   harassment you feel you suffered due to your  
21   accommodation?

22          A.    Well, the harassment I received when I was  
23   wearing the mask is I was being harassed during my break  
24   by employees at DFW in regards to me wearing the mask  
25   while I was eating.



1           O.    Okay.  Can you tell me the details of that?

2           A.    Yeah.  Derrick, one of the employees there,  
3           would come into the room.  He would see me eating there.  
4           And I have the mask down to take a bite of food and I  
5           was eating, and he would say pull that mask back up.  
6           And he would do that constantly just because he knew he  
7           could, and it was harassment.  I should have been  
8           allowed to eat somewhere else or have a separate break  
9           room if that was going to occur.  I told my supervisor  
10          about it, but he didn't do anything about it.

11          O.    And when approximately did this happen?

12          A.    This happened during the night shift when I  
13          was working.

14          O.    In what year?

15          A.    My time at DFW, so that would be in '21.

16          O.    Did Derrick know that you received an  
17          accommodation to the vaccine?

18          A.    Yeah, they all knew.

19          O.    How did they know?

20          A.    Because --

21          O.    I'm sorry, let me back up for a second.

22               Who is "they," they all knew?

23          A.    All the mechanics that I worked with, because  
24          all of this was talked about in the briefing, which I  
25          had a problem with because I thought this should all be

1 didn't think it was appropriate. I thought he was -- he  
2 shouldn't be doing it, he should just leave me alone,  
3 and that wasn't the case.

4 Q. What happened after you told Faiyaz?

5 A. He said, well, you agreed to having the mask,  
6 so it was part of your agreement.

7 Q. Okay.

8 A. But I didn't agree to harassment; I agreed to  
9 the mask.

10 Q. Do you believe you experienced any other  
11 instances of harassment as a result of your  
12 accommodation?

13 A. I do. I think overall how I was treated there  
14 after this whole incident with my accommodation, people  
15 were just making up stuff about me to try to get me in  
16 trouble. One of the things they were doing is they were  
17 talking -- we have light bulbs that we take the light  
18 bulbs out of the plane, and we have large light bulbs  
19 and small light bulbs. Well, people were accusing me of  
20 putting the small light bulbs in the large light bulb  
21 bin. It was like they don't have any proof of that. I  
22 never did it, but since somebody was doing it, I'm the  
23 guy that did it.

24 And then we would change the oil on the plane,  
25 and then we would have to drain out the cans. Well,

1 somebody was puncturing the can, and they weren't --  
2 there's a tool we use to open it up further so that we  
3 can stick it on a stand so it drains. Well, somebody  
4 was just puncturing the cans. They weren't opening it  
5 up and sticking it on there, and then they started  
6 blaming me for that. So there's no evidence of that. I  
7 was never doing it. It's almost like anything they  
8 could blame on me, they were blaming on me.

9 Q. And did that ever happen prior to you  
10 receiving your accommodation?

11 A. No, it didn't.

12 Q. Did anyone ever say that they were taking  
13 those actions because you were unvaccinated?

14 A. No, they didn't. They didn't need to. All of  
15 this behavior happened afterwards, you know.

16 Q. Did you report the incidents of kind of what  
17 you're describing of with the can and the light bulbs to  
18 anyone?

19 A. No, I didn't.

20 Q. Any other instances of harassment related to  
21 your accommodation that you can think of?

22 A. Just the way -- I mean, like I said, the way I  
23 was treated. Sam, one of the other workers there, got  
24 pissed off at me and threatened me because I wouldn't  
25 trade days with him, and that was all contained in an

1 email that I sent to Faiyaz and that --

2 Q. All right.

3 A. And then there was a fat shaming incident that  
4 happened, and that was also an email that I gave to  
5 Faiyaz.

6 What I was trying to do is just be quiet and  
7 not say anything and not -- just, you know, come in, do  
8 my work, go home. Don't -- just keep everything on an  
9 even keel and don't -- but the problem is that people's  
10 negative attitude, because it wasn't checked, just got  
11 worse and worse. And it got to a boiling point where I  
12 had to decide whether -- you know, what I was going to  
13 do, and I decided I need to get out of here. I said  
14 it's not going to improve here, so that's when I decided  
15 to transfer to San Antonio.

16 And the other thing I would like to point out,  
17 too, is generally if you go to a supervisor, they handle  
18 these problems and they take care it and that's it; but  
19 for some reason, I would go to Faiyaz and it was just  
20 sent up the chain. It never got resolved.

21 Q. Okay. So I'm going to show you --

22 MS. BROWN: Exhibit 9.

23 MS. MATTHEWS: Thank you.

24 Q. (BY MS. MATTHEWS) -- what's marked as  
25 Exhibit 9.



1           And apparently the guy that was downstairs, he  
2           had been sumping the plane. And he put the sump tool in  
3           there and he pulled it out as soon as he got the amount  
4           of fuel that he wanted, but he didn't check to see that  
5           the ball that controls whether it comes out or not,  
6           whether it was leaking. So then Sam started yelling at  
7           me for the leaking fuel tank when I was working inside  
8           the plane, I wasn't working the outside of the plane.  
9           And like I said, I just let that go. It went in one ear  
10          and went out the other ear. But it happened and it was  
11          inappropriate.

12          Q.    Okay. Other incidents that you can think of  
13          that are not in the email?

14          A.    No.

15          Q.    In these two emails?

16          A.    No.

17          Q.    Okay. So let's talk about each of these then.  
18                  So the first one, it says that you allege that  
19          Ted Schneider retaliated against you for having COVID by  
20          throwing a ball against your head?

21          A.    A tennis ball at my head.

22          Q.    Okay. Who is Ted Schneider?

23          A.    Ted Schneider is a mechanic over there in  
24          Denver. We were commuting back and forth to work  
25          together, and I had gotten COVID. And after that, we

1 Q. Do you remember when in 2020?

2 A. I don't.

3 Q. And was anyone else present when this  
4 happened?

5 A. No. He had walked into the office when I was  
6 sitting there on the computer.

7 Q. And you said he threw a tennis ball at your  
8 head?

9 A. He did.

10 Q. Did you report that to anyone?

11 A. I didn't.

12 Q. Okay. Let's talk about the next thing on your  
13 list. So you allege that a Denver coworker yelled at  
14 you for using his headset?

15 A. Yes.

16 Q. And so, again, this would have been in 2020?

17 A. Yeah.

18 Q. And so this was before you had received an  
19 accommodation?

20 A. Yeah, it was before the accommodation.

21 Q. And this was before United announced a vaccine  
22 requirement?

23 A. Yeah.

24 Q. Who was the coworker?

25 A. I don't remember his name.

1 Q. Okay. So it's possible somebody else wrote  
2 it?

3 A. Yeah. I don't recall. I don't recall.

4 Q. Okay. You don't recall whether you wrote it  
5 or --

6 A. Yeah, I don't --

7 Q. -- someone else wrote it?

8 A. Yeah, I don't recall.

9 Q. So I'm going to read you what's in this box  
10 here in the particulars.

11 A. What page is that?

12 Q. It's still on -- I'm still on 1898.

13 A. Okay.

14 Q. It says here: United Airlines told us in  
15 August of 2021 that they would be mandating the COVID-19  
16 vaccine at the company, effective at the end of  
17 September. I am a Buddhist and have a sincerely held  
18 religious belief that prevents me from taking the  
19 vaccines, but United said that we would need a letter  
20 from a pastor if we sought a religious exemption from  
21 the mandate. As a Buddhist, I do not have a pastor who  
22 could provide a letter for me. I later learned that the  
23 company removed the requirement of a pastor's letter but  
24 I had already attempted to file an accommodation form on  
25 United's computer system (Help Hub) and could not

1 complete the process. It also came out later that the,  
2 quote, "reasonable accommodation" for needing an  
3 exemption from the mandate would be unpaid leave.

4 I ended up filing a request for an  
5 accommodation in mid-September. My supervisor said the  
6 request was, quote, "untimely" since it did not follow  
7 United's internally-imposed deadline. While United  
8 rejected the, quote, "untimely" (according to the  
9 company) accommodation requests from others, they made  
10 an exception for my request because I am a named  
11 litigant in a case against the company. Were I not  
12 named in the lawsuit, I would have been terminated (like  
13 others at the company). As it was, my accommodation  
14 approval instead allowed me to be put on unpaid leave at  
15 the beginning of October. The company had decided in  
16 the meantime, though, (while the lawsuit was pending),  
17 to provide some exempt employees with actual  
18 accommodation that let us remain at work. Even though  
19 United ended up providing an accommodation for me to  
20 keep getting a paycheck, the company continues to  
21 prevent me from doing certain jobs (such as remote trips  
22 to work on engines) because of my vaccination status.  
23 These limitations are unreasonable given the mitigation  
24 steps I was willing to take while remaining employed,  
25 especially since I had already had COVID. This is even



1 more true now that the CDC has said unvaccinated  
2 individuals should not be treated differently than  
3 vaccinated individuals.

4 Did I read that correctly?

5 A. Yeah, you did.

6 Q. So you were never placed on unpaid leave,  
7 correct?

8 A. Yeah, I was never placed on unpaid leave.

9 Q. Your accommodation was masking and testing?

10 A. Yeah.

11 Q. And then let's just turn the page here. Can  
12 you turn to page that ends in 1890?

13 All right. And this is a letter from the  
14 EEOC. It's titled "Dismissal and Notice of Rights."  
15 And this letter is dated, at the bottom there,  
16 September 30, 2022, correct?

17 A. Where is it dated?

18 Q. All the way at the bottom in the signature  
19 line.

20 A. Okay.

21 Q. It's dated September 30, 2022, correct?

22 A. Yeah, that's what the date says.

23 Q. Okay. All right. You can set that aside for  
24 now.

25 MR. SULLIVAN: Is this a good time for a

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION  
DAVID SAMBRANO, et al.,           )  
individually, and on               )  
behalf of all others               )  
similarly situated,               )  
  ) Civil Action No.  
Plaintiffs,                         ) 4:21-cv-01074-P  
  )  
v.                                     )  
  )  
UNITED AIRLINES, INC.,           )  
  )  
Defendant.                         )

REPORTER'S CERTIFICATION  
VIDEOTAPED DEPOSITION OF DAVID CASTILLO  
SEPTEMBER 19, 2023  
  
I, Julie C. Brandt, Certified Shorthand Reporter in  
and for the State of Texas, hereby certify to the  
following:  
  
That the witness, DAVID CASTILLO, was duly sworn by  
the officer and that the transcript of the oral  
deposition is a true record of the testimony given by  
the witness;  
  
Before completion of the deposition, review of the  
transcript [ ] was [X] was not requested. If requested,  
any changes made by the deponent (and provided to the  
reporter) during the period allowed are appended hereto;

1 That the amount of time used by each party at the  
2 deposition is as follows:

3 Jordan M. Matthews.....04 HOUR(S):15 MINUTE(S)

4 John C. Sullivan.....00 HOUR(S):00 MINUTE(S)

5 That pursuant to information given to the  
6 deposition officer at the time said testimony was taken,  
7 the following includes counsel for all parties of  
8 record:

9 FOR THE PLAINTIFFS:

10 John C. Sullivan

11 SL LAW, PLLC

12 610 Uptown Blvd., Suite 2000

13 Cedar Hill, Texas 75104

14 john.sullivan@the-sl-lawfirm.com

15 FOR THE DEFENDANT:

16 Jordan M. Matthews

17 JONES DAY

18 110 N. Wacker Drive, Suite 4800

19 Chicago, Illinois 60606

20 312-269-4169

21 jmatthews@jonesday.com

22 -and-

23 Lauren N. Brown

24 JONES DAY

25 250 Vesey Street

1 New York, New York 10281-1047

2 212-326-3426

3 laurenbrown@jonesday.com

4 -and-

5 Russell D. Cawyer

6 KELLY HART & HALLMAN LLP

7 201 Main Street, Suite 2500

8 Fort Worth, Texas 76102

9 817-878-3562

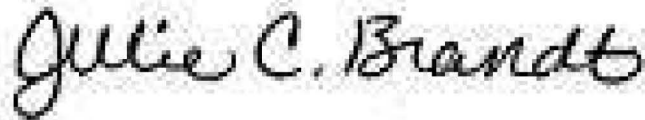
10 russell.cawyer@kellyhart.com

11 I further certify that I am neither counsel for,  
12 related to, nor employed by any of the parties or  
13 attorneys in the action in which this proceeding was  
14 taken, and further that I am not financially or  
15 otherwise interested in the outcome of the action.

16 Certified to by me September 28th, 2023.

17

18



19

---

Julie C. Brandt, CSR, RMR, CRR

20

Texas CSR No. 4018

Expiration Date: 10/31/23

21

Veritext Legal Solutions

22

Firm Registration No. 571

300 Throckmorton Street, Suite 1600

23

Fort Worth, Texas 76102

817-336-3042

24

25



# **EXHIBIT 112**

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION  
DAVID SAMBRANO, et al.,           )  
individually, and on               )  
behalf of all others               )  
similarly situated,               )  
  ) Civil Action No.  
Plaintiffs,                         ) 4:21-cv-01074-P  
  )  
v.                                     )  
  )  
UNITED AIRLINES, INC.,           )  
  )  
Defendant.                         )

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ORAL AND VIDEOTAPED DEPOSITION OF  
DENNIS COLE  
OCTOBER 13, 2023

\*\*\*\*\*

ORAL AND VIDEOTAPED DEPOSITION OF DENNIS COLE,  
produced as a witness at the instance of the Defendant,  
and duly sworn, was taken in the above-styled and  
numbered cause on the 13th day of October, 2023, from  
10:39 a.m. to 1:49 p.m., before Julie C. Brandt, RMR,  
CRR, and CSR in and for the State of Texas, reported by  
machine shorthand at Jones Day, LLP, 2727 North Harwood  
Street, Suite 500, Dallas, Texas, pursuant to the  
Federal Rules of Civil Procedure and the provisions  
stated on the record or attached hereto.

1 let me restart. That was about to be one of those bad  
2 questions.

3 Do you currently use any Pfizer products that  
4 you're aware of?

5 A. Not that I'm aware of.

6 Q. Would you have any objection to using a Pfizer  
7 product if it wasn't developed or manufactured using  
8 aborted fetal stem cells?

9 A. That's a great question. In other words,  
10 situational ethics, right? Hmm. I'll just say I  
11 generally would not want to support a company that uses  
12 manufacturing processes like that with no concern for  
13 it, yeah.

14 Q. So is that a yes or a no?

15 A. That's I would say no. No, I would not  
16 knowingly use Pfizer, support Pfizer.

17 Q. Okay. Same line of questioning for Moderna?

18 A. Same. Same answer.

19 Q. Same answer.

20 And then Johnson & Johnson?

21 A. Yeah, I don't -- I don't use Johnson & Johnson  
22 products either, whether it's hand cream or anything,  
23 no.

24 Q. Grandson/granddaughter comes along, are you  
25 going to use Johnson & Johnson soap?

1           A.    No. My wife, we've gone pretty natural with  
2           our stuff.

3           Q.    Okay.

4           A.    So we tend to get a lot of our stuff at  
5           Natural Grocers or -- so, no, we don't buy commercial  
6           products very much.

7           Q.    Did you prepare requests for accommodation  
8           that you submitted to United?

9           A.    I did. I don't think that letter has a date  
10          on it, but I believe it was August 9th when I submitted  
11          it. I think it was an email. I don't remember how it  
12          was submitted, but I think it was on August 9th, to the  
13          best of my recollection.

14          Q.    When you say letter, you mean the Jarrett  
15          letter or --

16          A.    No, the accommodation request.

17          Q.    -- the request for accommodation?

18          A.    Yeah, the accommodation request.

19          Q.    I want to hand you what I've marked as  
20          Exhibit 2.

21                               (Exhibit 2 marked.)

22          Q.    (BY MR. WINN) Does this appear to be a true  
23          and correct copy of the information that you provided in  
24          your reasonable accommodation request, as far as your  
25          religious reasons for seeking an accommodation?



1 Q. Yes, absolutely. Thank you.

2 You assert retaliation.

3 A. Uh-huh.

4 Q. The basis for that retaliation, why you think  
5 you were retaliated against, is because you requested an  
6 accommodation exempting you from the COVID vaccine. Is  
7 that correct?

8 A. I think largely that's correct. I think it  
9 would be more correctly stated that I was put on unpaid  
10 leave because I wouldn't comply with their mandate, that  
11 I believe -- my feeling is that the religious  
12 accommodation process was more of a legal formality for  
13 them. You know, they made it clear -- I'm aware that  
14 they just outright fired employees who exerted their, I  
15 believe, legal right to refuse the vaccines based on  
16 constitutional and moral reasons but didn't apply for  
17 the RAP.

18 And so I just feel like they -- you know,  
19 the RAP was simply a legal exercise that they did, but  
20 they -- it was because I refused to comply with their  
21 mandates, with their coercion and their increased  
22 pressure, yeah.

23 Q. So the unpaid leave is the retaliation against  
24 you?

25 A. Yeah. Yes.

1 Q. For --

2 A. For not --

3 Q. For not getting the vaccination?

4 A. For not complying. The accommodation I  
5 believe was simply -- I believe it was simply a legal  
6 thing that they felt they were compelled to do, because  
7 it was so cobbled together at the last minute and it was  
8 so confusing in the way they implemented it and the  
9 incredibly short notice that they gave for like the  
10 third-party letter and all that. It obviously wasn't  
11 well-thought-out.

12 And the fact is, we didn't have some urgent  
13 emergency that suddenly just cropped up in the last  
14 60 days. This was a very -- by this time, it was a very  
15 chronic situation with the country. And I just -- this  
16 is my impression, that the CEO tried to bribe people in  
17 June with pay. They tried to coerce people. They tried  
18 to -- eventually they set a deadline on it. And then  
19 the threat of being terminated was all -- and eventually  
20 enough, you know, they got the last holdouts at the last  
21 when they knew they were going to lose their jobs to get  
22 it. And I just believe the RAP process is really  
23 something they ultimately didn't want to do but they did  
24 for legal reasons, and their remedy was to throw us out  
25 on the street.

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION  
DAVID SAMBRANO, et al.,            )  
individually, and on                )  
behalf of all others                )  
similarly situated,                 )  
  ) Civil Action No.  
Plaintiffs,                            ) 4:21-cv-01074-P  
  )  
v.                                        )  
  )  
UNITED AIRLINES, INC.,             )  
  )  
Defendant.                            )

REPORTER'S CERTIFICATION  
VIDEOTAPED DEPOSITION OF DENNIS COLE  
OCTOBER 13, 2023

I, Julie C. Brandt, Certified Shorthand Reporter in  
and for the State of Texas, hereby certify to the  
following:  
That the witness, DENNIS COLE, was duly sworn by  
the officer and that the transcript of the oral  
deposition is a true record of the testimony given by  
the witness;  
Before completion of the deposition, review of the  
transcript [ ] was [X] was not requested. If requested,  
any changes made by the deponent (and provided to the  
reporter) during the period allowed are appended hereto;

1 That the amount of time used by each party at the  
2 deposition is as follows:

3 Taylor Winn.....02 HOUR(S):48 MINUTE(S)

4 John C. Sullivan.....00 HOUR(S):02 MINUTE(S)

5 That pursuant to information given to the  
6 deposition officer at the time said testimony was taken,  
7 the following includes counsel for all parties of  
8 record:

9 FOR THE PLAINTIFFS:

10 John C. Sullivan

11 SL LAW, PLLC

12 610 Uptown Blvd., Suite 2000

13 Cedar Hill, Texas 75104

14 john.sullivan@the-sl-lawfirm.com

15 FOR THE DEFENDANT:

16 Taylor Winn

17 Russell D. Cawyer

18 KELLY HART & HALLMAN LLP

19 201 Main Street, Suite 2500

20 Fort Worth, Texas 76102

21 817-878-3562

22 taylor.winn@kellyhart.com

23 russell.cawyer@kellyhart.com

24 I further certify that I am neither counsel for,  
25 related to, nor employed by any of the parties or



1 attorneys in the action in which this proceeding was  
2 taken, and further that I am not financially or  
3 otherwise interested in the outcome of the action.

4 Certified to by me October 25th, 2023.

5  
6 

7  
8 Julie C. Brandt, CSR, RMR, CRR  
9 Texas CSR No. 4018  
10 Expiration Date: 10/31/25

11 Veritext Legal Solutions  
12 Firm Registration No. 571  
13 300 Throckmorton Street, Suite 1600  
14 Fort Worth, Texas 76102  
15 817-336-3042  
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# **EXHIBIT 113**



Videotaped Deposition of Amber Davis  
held at:

Jones Day  
51 Louisiana Avenue, N.W.  
Washington, D.C.

Pursuant to Notice, when were present on behalf  
of the respective parties:



1       been terminated completely.

2                   BY MR. MAUGERI:

3           Q.     And you weren't one of the people  
4 that United denied a religious accommodation,  
5 were you?

6           A.     I was granted a religious -- they  
7 said I was granted a religious accommodation.

8           Q.     Is it -- is it your understanding  
9 that by virtue of being granted a religious  
10 accommodation, you're still employed with the  
11 company and remain unvaccinated?

12          A.     I believe I follow your question. I  
13 think yes.

14          Q.     Yeah. So because United granted you  
15 the accommodation for your religious objection,  
16 you were able to remain employed with the  
17 company and remain unvaccinated, correct?

18          A.     Well, they temporarily gave us  
19 indefinite, unpaid leave. In the State of  
20 California, it's considered termination. So  
21 they actually did terminate me, and it was  
22 because of the people you mentioned in this

1 case that I have my job.

2 Q. Is it -- is it your understanding --  
3 well, you testified a moment ago that people  
4 whose religious accommodation, as you put it,  
5 were denied outright were terminated from the  
6 company.

7 Do you remember that?

8 A. Yes.

9 Q. And so in contrast to individuals  
10 who were denied their religious accommodation,  
11 how were you treated differently by the  
12 company?

13 A. After, this case was filed, we were  
14 eventually brought back.

15 Q. And so by contrast to individuals  
16 who had their religious accommodation denied,  
17 you were able to remain employed at United,  
18 correct?

19 A. I was. I believe two of the  
20 terminated people may have gotten their jobs  
21 back, and I don't know what their status was,  
22 if they were part of the people that were

1 BY MR. MAUGERI:

2 Q. So to just re-ask the question  
3 before the break, were you aware that while on  
4 unpaid leave United pilots had the ability to  
5 apply preferentially to open jobs elsewhere in  
6 the airline?

7 A. They told us that we could apply.

8 Q. And did you make any efforts while  
9 on unpaid leave to research potentially  
10 available jobs elsewhere in the airline?

11 A. Yes. I applied for a special  
12 assignment position.

13 Q. And what was the nature of that  
14 special assignment position that you applied  
15 for?

16 A. It's a pilot special position. It  
17 works in the chief pilot's office.

18 Q. And what are the job duties for --  
19 for that type of role?

20 A. They handle more of managerial  
21 aspects of it. They make the phone calls to  
22 pilots that need maybe badging or reminders of

1       medicals or something. They handle different  
2       just administrative issues inside the chief  
3       pilot's office.

4           Q.       And were you awarded that job?

5           A.       It was instantly denied.

6           Q.       And describe for me what you mean by  
7       "instantly denied."

8           A.       It was an online application, and in  
9       the question marks, it asked: Are you  
10      vaccinated? which I responded no. And when I  
11      hit the submit, I had an automatic response:  
12      You have been denied.

13          Q.       Did you make any efforts after  
14      receiving that response to follow up with  
15      United to see if, despite your unvaccinated  
16      status, you might have been qualified for that  
17      special position?

18          A.       No. I believe that was very  
19      intentional on their part, so I did not follow  
20      through.

21          Q.       But so you didn't take any steps to  
22      reach out to determine whether that was a



1 BY MR. MAUGERI:

2 Q. And so are you aware that the  
3 Catholic church recommends that its  
4 parishioners actually get vaccinated from  
5 COVID?

6 MR. FIELD: Object to form.

7 THE WITNESS: I didn't know that  
8 they were recommending that.

9 BY MR. MAUGERI:

10 Q. Are you aware that the Catholic  
11 church does not oppose a COVID vaccination?

12 MR. FIELD: Same objection.

13 THE WITNESS: I'm not Catholic. I  
14 don't know what they say.

15 BY MR. MAUGERI:

16 Q. Are you aware of any major Christian  
17 religion -- religious sect that has a favorable  
18 view of the COVID vaccine?

19 MR. FIELD: Object to form.

20 THE WITNESS: I really don't.

21 BY MR. MAUGERI:

22 Q. Do you belong -- do you belong to a

1 Q. And are you contending that your  
2 prior contraction of COVID entitles you to any  
3 kind of medical or disability exemption from  
4 the COVID vaccine?

5 A. I never claimed that.

6 Q. Okay. So no part of your claims,  
7 you know, if you were asked, would include  
8 natural immunity from COVID?

9 A. Correct, I did not claim that at  
10 all.

11 Q. Has anyone at United ever harassed  
12 you as a result of -- well, are you alleging  
13 any harassment by United or its personnel  
14 related to your experience with the COVID  
15 vaccine?

16 A. I think the application was somewhat  
17 harassing. The initial town hall -- I believe  
18 that was in August -- by flight ops was meant  
19 to intimidate. And I believe the loss of all  
20 the privileges, especially the jump seat  
21 because I mean that's -- I don't have to be on  
22 United for that, and they took that away too.

1           And I -- as most pilots live their  
2           lives, paying for flight tickets is not part of  
3           our budget. And I traveled back and forth to  
4           see my family to help them out. My partners  
5           are elderly, and I was no longer receiving any  
6           sort of pay and having to pay exorbitant  
7           amounts for insurance that I didn't have to pay  
8           for. Now I also have to budget in potential  
9           airfare. It just seemed like it was -- yeah,  
10          it was meant -- it was meant to harass us.

11           Q.       And all of the conduct that you just  
12           testified about that you say was harassing,  
13           would you agree that United engaged in that as  
14           to all the unvaccinated alike?

15                   MR. FIELD: Object to form.

16                   THE WITNESS: I think they were in  
17           the same situation.

18                   And then when we did come back, we  
19           received CCS messages -- that's our  
20           communication system -- about certain cities we  
21           couldn't fly to. And they -- other pilots did  
22           not see these messages. They were threatening.

## 1 CERTIFICATE OF NOTARY PUBLIC

2 I, Bonnie L. Russo, the officer before  
3 whom the foregoing deposition was taken, do  
4 hereby certify that the witness whose testimony  
5 appears in the foregoing deposition was duly  
6 sworn by me; that the testimony of said witness  
7 was taken by me in shorthand and thereafter  
8 reduced to computerized transcription under my  
9 direction; that said deposition is a true  
10 record of the testimony given by said witness;  
11 that I am neither counsel for, related to, nor  
12 employed by any of the parties to the action in  
13 which this deposition was taken; and further,  
14 that I am not a relative or employee of any  
15 attorney or counsel employed by the parties  
16 hereto, nor financially or otherwise interested  
17 in the outcome of the action.

18   
19

20 Notary Public in and for  
21 the District of Columbia

22 My Commission expires: August 14, 2025



VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted

fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

Veritext Legal Solutions complies with all federal and State regulations with respect to the provision of court reporting services, and maintains its neutrality and independence regardless of relationship or the financial outcome of any litigation. Veritext requires adherence to the foregoing professional and ethical standards from all of its subcontractors in their independent contractor agreements.

Inquiries about Veritext Legal Solutions' confidentiality and security policies and practices should be directed to Veritext's Client Services Associates indicated on the cover of this document or at [www.veritext.com](http://www.veritext.com).

# **EXHIBIT 114**

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION  
DAVID SAMBRANO, et al., )  
individually, and on )  
behalf of all others )  
similarly situated, )  
 ) Civil Action No.  
Plaintiffs, ) 4:21-cv-01074-P  
 )  
v. )  
 )  
UNITED AIRLINES, INC., )  
 )  
Defendant. )

\*\*\*\*\*  
"CONFIDENTIAL"  
ORAL AND VIDEOTAPED DEPOSITION OF  
KIMBERLY HAMILTON  
SEPTEMBER 20, 2023  
\*\*\*\*\*

ORAL AND VIDEOTAPED DEPOSITION OF KIMBERLY  
HAMILTON, produced as a witness at the instance of the  
Defendant, and duly sworn, was taken in the above-styled  
and numbered cause on the 20th day of September, 2023,  
from 9:32 a.m. to 5:00 p.m., before Julie C. Brandt,  
RMR, CRR, and CSR in and for the State of Texas,  
reported by machine shorthand at Kelly Hart & Hallman,  
LLP, 201 Main Street, Suite 2500, Fort Worth, Texas,  
pursuant to the Federal Rules of Civil Procedure and the  
provisions stated on the record or attached hereto.

1 aligned with those religious organizations?

2 A. Well, I feel like I try to get an overview of  
3 the things that they support and kind of stick to a few  
4 groups that I feel comfortable with and target my  
5 donations in that -- in that -- into that group of  
6 organizations.

7 Q. But you would never donate to a group that  
8 believed that gay and lesbian parents shouldn't be able  
9 to adopt children, would you?

10 MR. FIELD: Same objection -- or object  
11 to form.

12 A. I don't know. They may have other positive  
13 variety of things going on, and there could be ways to  
14 donate to them. I don't know that I -- I don't know  
15 that I even know about a group to belong to that  
16 supports what you're asking about. There may be one. I  
17 just don't know it.

18 Q. (BY MR. CAWYER) What religious organizations  
19 do you routinely donate to?

20 A. I donate to the church where we attend mass,  
21 even if it's -- even if it's just an occasional time  
22 there, if we go to mass there, we donate. And I donate  
23 to -- I've donated to Our Lady of Fatima. I have  
24 donated to the Coalition for Canceled Priests. I  
25 donated to the Passionists, to the dioceses. There may



1 A. Okay.

2 Q. Do you see that the COVID-19 vaccination  
3 policy was offering exemptions for medical reasons and  
4 for sincerely held religious beliefs?

5 A. I see it.

6 Q. So you knew on August 6, 2021, that United was  
7 offering employees the ability to apply for exemptions  
8 due to medical conditions and religious reasons?

9 MR. FIELD: Objection to form.

10 A. I don't -- I don't remember that from the  
11 initial days.

12 Q. (BY MR. CAWYER) Well, you were emailed a copy  
13 of the policy, right?

14 A. Uh-huh. Yes.

15 Q. Did you ever propose any alternative  
16 accommodations to United?

17 A. How -- propose them how?

18 Q. In any way.

19 A. I think only in an initial mediation that we  
20 had, I think we came up with some suggestions for the  
21 company.

22 Q. You mean in the context of this lawsuit?

23 A. Uh-huh. Yes.

24 Q. I'm not talking about this lawsuit or  
25 mediations that are confidential by law.

1           What I'm talking about is at any time during  
2 the Help Hub accommodation process, did you ever propose  
3 any alternative accommodations to United?

4           A.   I don't remember proposing any, no.

5           Q.   Now you and United exchanged messages back and  
6 forth through the Help Hub, right?

7           A.   That seems like weird terminology to me. I  
8 submitted. I waited, I waited. I checked, I checked.  
9 It wasn't very interactive. They requested a couple of  
10 things of me. I submitted -- I feel like -- I feel like  
11 the way you described it isn't the way I felt it.

12          Q.   Did you send messages to United through the  
13 Help Hub about the RAP process?

14          A.   I sent my RAP in.

15          Q.   And you requested a religious accommodation?

16          A.   I did.

17          Q.   And United sent you messages back through the  
18 Help Hub, didn't they?

19          A.   Eventually they asked me for the third-party  
20 letter.

21          Q.   Okay. And then you sent that back, right?

22          A.   I did.

23          Q.   And then United approved your request for an  
24 accommodation, right?

25          A.   Eventually.

1           Q.    And you just didn't like the accommodation  
2           that was granted, true?

3                       MR. FIELD:   Objection.

4                       You can answer.

5           A.    Well, I was --

6           Q.    (BY MR. CAWYER) Do you want me to break it  
7           down?

8           A.    Yes, could you?

9           Q.    You got an email from United that said your  
10          request for accommodation is granted?

11          A.    I got -- yes, I got that.

12          Q.    You never got any communication from United  
13          saying your request for religious accommodation was  
14          denied?

15          A.    I did not get denial.

16          Q.    But what you found disagreeable was the  
17          accommodation that United offered you was temporary  
18          unpaid leave?

19          A.    Thank you for saying that like that. Yes.

20          Q.    And so United granted your accommodation; you  
21          didn't like the accommodation that was granted. True?

22          A.    I was very worried about being without  
23          healthcare and a paycheck. That's not true. I was  
24          panic stricken.

25          Q.    My question was, United granted your request

1 MR. FIELD: Object to form.

2 A. I'm sure I was seeing things that they were  
3 putting out.

4 Q. (BY MR. CAWYER) Okay.

5 A. And I was seeing Scott Kirby doing interviews  
6 on different media programs.

7 Q. Do you remember specifically anything that  
8 Scott Kirby said on any of these media interviews?

9 A. He said that he was giving percentages of  
10 vaccinated employees. He said it was going to be sad to  
11 see the people go that wouldn't take the vaccine.

12 Q. Do you agree it would be sad to see United  
13 employees be separated?

14 A. Absolutely.

15 Q. Do you agree that it would be sad for United  
16 employees to die from COVID?

17 A. Of course.

18 Q. Are you aware of any DFW United employees that  
19 died?

20 A. No.

21 Q. Anything else you remember Mr. Kirby saying in  
22 any of those television media interviews?

23 A. I remember him saying that very few people  
24 with religious accommodations would make it through the  
25 process.

1           Q.   Is one of the fundamental tenets of your  
2 religious beliefs thou shall not lie?

3           A.   Yes.

4           Q.   Do you believe it would be wrong for an  
5 employee to lie about a religious belief in order to  
6 obtain an employment benefit?

7           A.   Yes.

8           Q.   Do you agree that it would be wrong for an  
9 employee to lie about their religious beliefs to avoid  
10 getting a vaccine?

11          A.   It's wrong to lie for anything.

12          Q.   That's right.

13               And you would agree with me that if employees  
14 lied at United about their religious beliefs to get a  
15 vaccine exemption, that they should be subject to  
16 discipline, shouldn't they?

17               MR. FIELD: Object to form.

18          A.   Yeah, I think they should or could be.

19          Q.   (BY MR. CAWYER) And that would be  
20 appropriate, wouldn't it, in your opinion?

21          A.   I don't have much of an opinion between that.  
22 That would be between them and the company.

23          Q.   Well, when you heard Mr. Kirby's statements,  
24 did you hear him telling people don't lie about your  
25 religious beliefs because you could get in trouble, you



1 would be putting your job on the line if you lie about  
2 religious beliefs?

3 A. No, that's not what I heard.

4 Q. Okay. What is it specifically that you heard?

5 A. I heard the gauntlet thrown down that he was  
6 assuming that you would be lying and very few people  
7 would make it through.

8 Q. Okay. Well, what words did he use that you  
9 heard that you say were throwing down the gauntlet?

10 A. For people who suddenly got religion.

11 Q. And do you think that people might, quote,  
12 "suddenly get religion" to obtain a vaccine exemption?

13 A. I have no idea.

14 Q. If people were misrepresenting their religious  
15 beliefs by suddenly getting religion to avoid taking the  
16 vaccine, would that violate your religious beliefs that  
17 thou shall not lie?

18 MR. FIELD: Objection, form, speculation.

19 Q. (BY MR. CAWYER) You can answer.

20 A. That would cause me to have to make a judgment  
21 against them, so I wouldn't really think much about it.

22 Q. It would be a negative judgment that you would  
23 make about them, right?

24 MR. FIELD: Objection, form.

25 A. No, it would be a judgment about their

1 beliefs, and that's not for me to judge.

2 Q. (BY MR. CAWYER) Okay. Well, you weren't  
3 worried about what Mr. Kirby said on that video, were  
4 you, because you weren't lying about your religious  
5 beliefs?

6 A. Oh, I was worried.

7 Q. Okay. Why were you worried even though you  
8 weren't lying about your religious beliefs?

9 A. Because he said many people weren't going to  
10 make it through the process.

11 Q. Well, you made it through the process, right?

12 A. Because we filed the lawsuit.

13 Q. Well, you don't know, do you?

14 A. I do feel like I know.

15 Q. You don't know what would have happened if you  
16 didn't file the lawsuit, do you?

17 A. I do feel like I know.

18 Q. Okay. How is it that you can't speculate  
19 about some things, but you can speculate about what  
20 United Airlines would have done if your group hadn't run  
21 off and filed a lawsuit?

22 MR. FIELD: Objection, argumentative.

23 A. Because I don't feel like I'm speculating. I  
24 feel like all the clues were there and all you had to do  
25 was read them.

1 Q. (BY MR. CAWYER) What clues?

2 A. That he was belittling people with religious  
3 views.

4 Q. What did he say that you took as belittling  
5 people with religious views?

6 MR. FIELD: Asked and answered.

7 A. If you suddenly got religion, that that wasn't  
8 going to work for you.

9 Q. (BY MR. CAWYER) Uh-huh. Anything else?

10 A. That's all it took for me.

11 Q. Okay. If Mr. Kirby gets on the stand and says  
12 that what he has communicated to employees repeatedly is  
13 don't lie about your religious beliefs to get a vaccine  
14 exemption, do you have any reason to disbelieve him?

15 MR. FIELD: Objection, speculation.

16 A. He's free to say what he wants to say.

17 Q. (BY MR. CAWYER) And he's the only one who  
18 knows what he means, right?

19 A. Well, I think people talk, and you can  
20 understand what they're saying.

21 Q. Did you ever talk to Mr. Kirby personally?

22 A. I have.

23 Q. When?

24 A. Maybe four or five years ago.

25 Q. Okay. So you've never talked to him since the

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION  
DAVID SAMBRANO, et al., )  
individually, and on )  
behalf of all others )  
similarly situated, )  
 ) Civil Action No.  
Plaintiffs, ) 4:21-cv-01074-P  
 )  
v. )  
 )  
UNITED AIRLINES, INC., )  
 )  
Defendant. )

REPORTER'S CERTIFICATION  
VIDEOTAPED DEPOSITION OF KIMBERLY HAMILTON  
SEPTEMBER 20, 2023  
  
I, Julie C. Brandt, Certified Shorthand Reporter in  
and for the State of Texas, hereby certify to the  
following:  
  
That the witness, KIMBERLY HAMILTON, was duly sworn  
by the officer and that the transcript of the oral  
deposition is a true record of the testimony given by  
the witness;  
  
Before completion of the deposition, review of the  
transcript [ ] was [X] was not requested. If requested,  
any changes made by the deponent (and provided to the  
reporter) during the period allowed are appended hereto;

1 That the amount of time used by each party at the  
2 deposition is as follows:

3 Russell D. Cawyer.....05 HOUR(S):30 MINUTE(S)

4 Brian Field.....00 HOUR(S):00 MINUTE(S)

5 That pursuant to information given to the  
6 deposition officer at the time said testimony was taken,  
7 the following includes counsel for all parties of  
8 record:

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10 I further certify that I am neither counsel for,  
11 related to, nor employed by any of the parties or  
12 attorneys in the action in which this proceeding was  
13 taken, and further that I am not financially or  
14 otherwise interested in the outcome of the action.

15 Certified to by me September 29, 2023

16

17

18



19 Julie C. Brandt, CSR, RMR, CRR

20 Texas CSR No. 4018

21 Expiration Date: 10/31/23

22

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23

24

25

# **EXHIBIT 115**

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
Fort Worth Division

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DAVID SAMBRANO, et al., ) Civil Action No.  
individually, and on ) 4:21-cv-01074-P  
behalf of all others )  
similarly situated, )  
 )  
Plaintiffs, )  
 )  
vs. )  
 )  
UNITED AIRLINES, INC., )  
 )  
Defendant. )  
----- )

Videotaped Deposition of  
KAITLYN A. HOVILA  
October 23, 2023  
9:44 a.m.

Reported by: Bonnie L. Russo  
Job No. 6143257

1 Q. So take a moment to look at this.

2 MR. MAUGERI: Just for the record,  
3 it's Exhibit 1, United Sambrano ending in 76554  
4 and August 21st -- sorry -- August 27, 2021  
5 letter.

6 BY MR. MAUGERI:

7 Q. Do you recognize this letter?

8 A. Yes.

9 Q. Okay. Do you recognize it to be the  
10 third-party letter you submitted in connection  
11 with your religious RAP to United?

12 A. Yes.

13 Q. Does this refresh your recollection  
14 that United requested that you submit a  
15 third-party letter in connection with your RAP?

16 A. I honestly still don't remember if  
17 they made us give these or if they just asked  
18 for more proof of our RAP.

19 Q. Understood. So when -- either when  
20 United requested it or you were just providing  
21 more proof, you didn't submit a letter from  
22 McLean Bible Church, did you?

1 THE WITNESS: Yes.

2 BY MR. MAUGERI:

3 Q. Would you agree with the statement  
4 that employees who are vaccinated were allowed  
5 to keep their jobs and were treated with  
6 dignity and respect?

7 A. Yes.

8 Q. And would you agree with the  
9 statement that employees who were unvaccinated  
10 were harassed or otherwise discriminated  
11 against?

12 MR. FIELD: Same objection.

13 THE WITNESS: Yes.

14 BY MR. MAUGERI:

15 Q. What is your understanding of what  
16 would have happened to you at United if you had  
17 remained unvaccinated and had not received a  
18 RAP?

19 A. I would have gotten fired.

20 Q. And earlier you said you never  
21 sought to rescind your RAP and be fired from  
22 United, did you?



## 1 CERTIFICATE OF COURT REPORTER

2  
3 I, Bonnie L. Russo, do hereby certify that  
4 the foregoing transcript is a true record of  
5 the proceedings to the best of my ability, that  
6 I am not related to or employed by any of the  
7 parties involved in these proceedings, and,  
8 further, that I am not a relative or employee  
9 of any attorney or counsel employed by the  
10 parties hereto, or financially interested in  
11 the proceedings.

12   
13

14 Bonnie Russo  
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