

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF KANSAS**

UNITED STATES OF AMERICA,)	
)	
<i>Plaintiff,</i>)	
)	
v.)	Civil Action No.: 99-1180-JTM
)	
AMR CORPORATION,)	
AMERICAN AIRLINES, INC., and)	
AMR EAGLE HOLDING)	
CORPORATION,)	
)	
<i>Defendants.</i>)	
)	

**DECLARATION OF REBEKAH J. FRENCH IN SUPPORT OF
PLAINTIFF’S MOTION FOR CLARIFICATION**

1. My name is Rebekah J. French. I am a lawyer for the United States in the above-captioned litigation. I have had primary responsibility for responding to Defendants’ discovery demands in this case, and for complying with the Court’s May 9, 2000, Memorandum and Order (“May 9 Order”). I submit this declaration in support of the United States’ Motion for Clarification of the May 9 Order.

2. I have personal knowledge of the following facts, unless otherwise noted, and could and would testify competently thereto if called upon to do so.

3. After receiving the Court’s May 9 Order, I instituted a search for CID materials submitted in response to the CIDs produced to American in response to Request No. 24 of American’s Second Set of Document Requests. Unlike previous searches conducted in this case, I did not limit my selection of responsive CID materials to those materials which members of trial staff had

used or intended to use in connection with this case. My search therefore resulted in the discovery of many documents which had never been seen by members of the trial staff, much less used in connection with this case.

4. I was assisted in my search by two attorneys, and numerous paralegals assisted in the bates-labeling and copying of the CID materials. Our only contact with the copies of materials produced by ASTA in response to CID No. 12482 (“ASTA CID materials”) resulted from our efforts to comply with the Court’s May 9 Order. Other than those persons who assisted me in this search, no member of the trial staff has reviewed the ASTA CID materials in connection with this case.

5. I sent the ASTA CID materials to ASTA on May 20, 2000, along with a copy of the Court’s May 9 Order and September 14, 1999, Protective Order Governing Confidential Information.

6. On June 6, 2000, I received a letter from ASTA’s general counsel, Burton J. Rubin, informing me that ASTA did not consent to the disclosure of the ASTA CID materials to defendants, and would rely on the statutory prohibition against disclosure of this material.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge, information and belief. Executed this 23rd day of June, 2000.

/ “s”/
Rebekah J. French