



O'Melveny & Myers LLP
Times Square Tower
7 Times Square
New York, NY 10036-6537

T: +1 212 326 2000
F: +1 212 326 2061
omm.com

Application **GRANTED**. The deadline to file any motions to seal is extended to **December 20, 2021**.

November 18, 2021

Andrew J. Frackman
D: +1 212 326 2017
afrackman@omm.com

VIA ECF

Dated: **November 19, 2021**
New York, New York

Hon. Lorna G. Schofield
United States District Court
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: *US Airways, Inc., for American Airlines, Inc. as Successor and Real Party in Interest v. Sabre Holdings Corp., et al., No. 1:11-cv-02725-LGS*
Joint Letter Motion to Extend Time to File Sealing Motions

Dear Judge Schofield:

We write on behalf of the parties in the above-captioned case, and pursuant to Your Honor's Individual Rule I.B.2, to jointly request an extension of time to file sealing motions for documents submitted in support of and in opposition to Sabre's Motion for Summary Judgment (Dkt No. 1038) and Sabre's *Daubert* Motion to Exclude Certain Testimony of Dr. Rosa Abrantes-Metz (Dkt. No. 1042). The parties filed the relevant materials conditionally under seal and the current deadline to file any sealing motions is November 29, 2021 (Dkt. No. 1033). The parties are meeting and conferring with each other in an attempt to resolve any disputes prior to filing the motions to seal, and must coordinate with at least nine third parties that marked as confidential material used in connection with the summary judgment and *Daubert* motions. Given the high volume of papers that the parties (and third parties) must review¹—and also in light of the intervening Thanksgiving holiday, which complicates the necessary coordination, including with third parties—the parties seek an extension until December 20, 2021 for their motions to seal. This is the first request for an extension of time.

Respectfully submitted,



Andrew J. Frackman
of O'MELVENY & MYERS LLP
for *US Airways, Inc. for American Airlines, Inc. as*
Successor and Real Party in Interest

cc: Counsel for Sabre (via ECF)

¹ Between the summary judgment and *Daubert* motions, the parties must review more than 1,000 pages of documents.