

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

<hr/>	
American Airlines, Inc.,)
)
Plaintiff,)
)
v.)
)
) Civil Action No. 4:11-cv-00244-Y
Travelport Limited, Travelport, LP, d/b/a)
Travelport;)
)
Orbitz Worldwide, LLC d/b/a Orbitz;)
)
and)
)
Sabre Inc., Sabre Holdings Corporation, Sabre)
Travel International Limited d/b/a Sabre)
Travel Network,)
)
Defendants.)
<hr/>	

JOINT MOTION FOR ENTRY OF A PROTECTIVE ORDER

Pursuant to Federal Rule of Civil Procedure 26, the Parties jointly move for entry of a protective order. The parties agree that certain documents and information have been and may be sought, produced or exhibited by and between the parties to the above-styled proceeding or third parties which relate to trade secrets, confidential information, and other kinds of commercially-sensitive information which the party making the production deems confidential. A protective order is necessary to preserve the

confidentiality of certain such information. Thus, the parties respectfully request that the Court enter a protective order in the form attached as Exhibit A.¹

Dated: August 10, 2011

AGREED BY:

AGREED BY:

/s Yolanda C. Garcia

R. Paul Yetter
State Bar No. 22154200
Anna Rotman
State Bar No. 24046761
YETTER COLEMAN LLP
909 Fannin, Suite 3600
Houston, Texas 77010
713.632.8000
713.632.8002 (fax)

Bill Bogle
State Bar No. 025661000
Roland K. Johnson
State Bar No. 00000084
HARRIS, FINLEY & BOGLE, P.C.
777 Main Street, Suite 3600
Fort Worth, Texas 76102
817.870.8700
817.332.6121 (fax)

Yolanda C. Garcia
State Bar No. 24012457
Michelle Hartmann
State Bar No. 24032401
WEIL, GOTSHAL & MANGES LLP
200 Crescent Court, Suite 300
Dallas, Texas 75201-6950

/s Walker C. Friedman

Walker C. Friedman
State Bar No. 07472500
wcf@fsclaw.com
FRIEDMAN, SUDER & COOKE
604 E. 4th Street, Suite 200
Fort Worth, Texas 76102
817.334.0144
817.334.0401 (fax)

Michael L. Weiner
michael.weiner@dechert.com
Dechert LLP
1095 Avenue of the Americas
New York, New York 10036-6797
212.698.3608
212.698.3599 (Fax)

Mike Cowie
mike.cowie@dechert.com
Craig Falls
craig.falls@dechert.com
Dechert LLP
1775 I Street, NW
Washington, D.C. 20006-2401
202.261.3300
202.261.3333 (Fax)

¹ American Airlines, Inc. objects to certain language in paragraphs 9 and 14 governing the use of information produced in this case in other litigation. American thus reserves the right to file a motion seeking modification of the agreed Protective Order. Defendants reserve the right to oppose such modifications. In the meantime, American will abide by the terms of the Protective Order as agreed upon by the parties.

214.746.7700
214.746.7777 (fax)

Of Counsel:

DEWEY & LEBOEUF LLP
M.J. Moltenbrey
1101 New York Ave. NW
Washington, D.C. 20005
202.346.8738
202.346.8102 (fax)

WEIL, GOTSHAL & MANGES LLP
Richard A. Rothman
James W. Quinn

767 Fifth Avenue
New York, New York 10153
212.310.8426
212.310.8285 (fax)

Attorneys for Plaintiff American Airlines, Inc.

John T. Schriver
JTSchriver@duanemorris.com
Paul E. Chronis
pechronis@duanemorris.com
Duane Morris LLP
Suite 3700
190 South LaSalle Street
Chicago, Illinois 60603-3433
312.499.6700
312.499.6701 (Fax)

*Attorneys for Defendants Travelport Ltd.,
Travelport, L.P.,*

/s Christopher S. Yates
Christopher S. Yates
Email: Chris.Yates@lw.com

Daniel M. Wall
Email: Dan.Wall@lw.com

[Brendan A. McShane](mailto:Brendan.McShane@lw.com)
Email: Brendan.McShane@lw.com

LATHAM & WATKINS LLP
505 Montgomery Street, Suite 2000
San Francisco, CA 94111-6538
Telephone: (415) 391-0600
Facsimile: (415) 395-8095

John J. Little
Email: jlittle@jpf-law.com
Stephen G. Gleboff
Texas State Bar No. 08024500
Email: stevegleboff@jpf-law.com

Megan K. Dredla
Email: mdredla@jpf-law.com

LITTLE PEDERSEN FANKHAUSER LLP
901 Main Street, Suite 4110
Dallas, TX 75202-3714
Telephone: (214) 573-2300
Facsimile: (214) 573-2323

Attorneys for Defendant Orbitz Worldwide, LLC

/s Scott A. Fredricks

Scott A. Fredricks
Texas Bar No. 24012657
(sfredricks@canteyhanger.com)
Ralph H. Duggins
Texas Bar No. 06183700
(rduggins@canteyhanger.com)
Philip A. Vickers
Texas Bar No. 24051699
(pvickers@canteyhanger.com)
CANTEY HANGER LLP
Cantey Hanger Plaza
600 West 6th Street, Suite 300
Fort Worth, TX 76102-3685
Phone: (817) 877-2800
Facsimile: (817) 877-2807

Donald E. Scott
Colorado Bar No. 21219, Illinois Bar No.
2531321
(don.scott@bartlit-beck.com)
Karma M. Giulianelli
Colorado Bar No. 30919, California Bar No.
184175
(karma.giulianelli@bartlit-beck.com)
Sean C. Grimsley
Colorado Bar No. 36422, California Bar No.
216741
(sean.grimsley@bartlit-beck.com)
Sundee K. (Rob) Addy
Colorado Bar No. 38754
(rob.addy@bartlit-beck.com)
BARTLIT BECK HERMAN PALENCHAR & SCOTT
LLP
1899 Wynkoop Street, 8th Floor
Denver, Colorado 80202
Phone: (303) 592-3100
Facsimile: (303) 592-3140

Chris Lind
Illinois Bar No. 6225464, Colorado Bar No
27719
(chris.lind@bartlit-beck.com)

Andrew K. Polovin
Illinois Bar No. 6275707
(andrew.polovin@bartlit-beck.com)
Katherine M. Swift
Illinois Bar No. 6290878
(kate.swift@bartlit-beck.com)
BARTLIT BECK HERMAN PALENCHAR & SCOTT
LLP
54 West Hubbard Street, Suite 300
Chicago, IL 60610
Phone: (312) 494-4400
Facsimile: (312) 494-4440

George S. Cary
(gcary@cgsh.com)
Steven J. Kaiser
(skaiser@cgsh.com)
CLEARY GOTTLIEB STEEN & HAMILTON LLP
2000 Pennsylvania Ave., N.W.
Washington, DC 20006
Telephone: (202)974-1920
Facsimile: (202)974-1999

*Attorneys for Sabre Inc., Sabre Holdings
Corporation, and Sabre Travel Int'l Ltd. d/b/a
Sabre Travel Network*

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of the foregoing document via the Court's CM/ECF system pursuant to the Court's Local Rule 5.1(d) this 10th day of August, 2011.

/s Robert S. Velevis
Robert S. Velevis