

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

AMERICAN AIRLINES, INC.
Plaintiff

v.

SABRE, INC., ET AL.
Defendants

§
§
§
§
§
§
§

CIVIL ACTION NO. 4:11-CV-00244-Y

**UNOPPOSED MOTION FOR ENTRY OF A
STIPULATED SUPPLEMENTAL PROTECTIVE ORDER**

Pursuant to Fed. R. Civ. P. 26(c)(1)(G), Plaintiff American Airlines, Inc. (“American”) requests that the Court sign and enter the attached Stipulated Supplemental Protective Order, for which good cause exists.

American has issued on Expedia, Inc. (“Expedia”) a Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action dated July 27, 2011 (the “Subpoena”). Expedia timely filed objections to certain requests, but is providing documents to certain requests for which it does not object. The documents to be produced are likely to contain competitive, proprietary and otherwise commercially sensitive information, public disclosure of which would be harmful to Expedia. Expedia has therefore requested entry of the accompanying supplemental protective order as a condition of its production of documents in response to the subpoena.

Accordingly, American requests on Expedia’s behalf that the Court enter the attached proposed Stipulated Supplemental Protective Order.

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule 7.1(h), undersigned counsel for American certifies that counsel for Defendants have been consulted and that counsel for Defendants do not oppose the relief sought in this motion.

Respectfully submitted,

/s/ Roland K. Johnson

Dated: August 24, 2011

Bill Bogle
State Bar No. 06256100
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)

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)

Michelle Hartmann
State Bar No. 24032401
WEIL, GOTSHAL & MANGES LLP
200 Crescent Court, Suite 300
Dallas, Texas 75201-6950
214.746.7700
214.746.7777 (fax)

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

202.346.8102 (fax)

Richard A. Rothman
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
212.310.8426
212.310.8285 (fax)

**ATTORNEYS FOR PLAINTIFF
AMERICAN AIRLINE, INC.**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 24, 2011, a true and correct copy of the foregoing was filed with the Clerk of this Court using the CM/ECF system, which will serve a notice of filing upon the filing users.

/s/ Roland K. Johnson