

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

**AMERICAN AIRLINES, INC.,
Plaintiff,**

v.

**SABRE, INC., ET AL.,
Defendants.**

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

STIPULATION

Plaintiff American Airlines, Inc. (“American”) and Defendants Sabre Inc., Sabre Holdings Corporation, and Sabre Travel International Ltd. d/b/a Sabre Travel Network (collectively, “Sabre”), Travelport Ltd. and Travelport, L.P. (collectively, “Travelport”), and Orbitz Worldwide, LLC (“Orbitz” and collectively, with Sabre and Travelport, the “Defendants”), hereby agree and stipulate as follows with respect to the production and use in this case of documents produced by Sabre and American in the state court matter pending in the Tarrant County District Court, 67th Judicial District as Case No. 67-249214-10 (the “State Case”). American and Defendants (collectively, the “Parties”) agree that any documents that have been produced by Sabre or American in the State Case shall be deemed also to be produced in this case upon delivery of copies to Travelport and Orbitz. No document produced by Sabre or American in the State Case shall be deemed produced in this case until Travelport and Orbitz, which are not parties to the State Case, are each served with a copy of that document and all other documents produced to date by the same party in the State Case. No document produced by any non party in the State Case shall be deemed produced in this case until Travelport and Orbitz are each served with a copy of that document and all other documents produced by the same non party in the State Case.

Sabre agrees to produce to each of Travelport and Orbitz all documents produced by Sabre in the State Case within seven days of the date of this stipulation, and for any future productions, within seven days of their production in the State Case. American agrees to produce to each of Travelport and Orbitz all documents produced by American in the State Case no later than by October 4, 2011, and, for any future productions, within seven days of their production in the State Case. Each of American, Sabre, Travelport and Orbitz (collectively, “the Parties”), reserves the right to object to the authenticity and admissibility of such documents in this case. The Parties further agree that the production of such documents in this case will in no way abridge the rights of the Parties to obtain additional discovery in this case.

The Parties further agree that any documents designated by American as “Confidential” under the protective order in the State Case will likewise be treated as Confidential under the Protective Order in this case (Docket No. 130). In addition, the Parties agree that any documents designated by American as “Confidential-Outside Counsel’s Eyes Only” or “Highly Confidential” under the protective order in the State Case shall be treated as “Outside Attorneys’ Eyes Only” under the Protective Order in this case.

The Parties further agree that any documents and testimony designated by Sabre in the State Case as “Confidential” under the protective order in the State Case will likewise be treated by American as Confidential under the Protective Order in this case. In addition, the Parties agree that any documents and testimony designated by Sabre as “Confidential-Outside Counsel’s Eyes Only” or “Highly Confidential” under the protective order in the State Case shall be treated as “Outside Attorneys’ Eyes Only” under the Protective Order in this case.

Travelport and Orbiz further agree that any documents produced by Sabre as “Confidential,” “Confidential-Outside Counsel Only,” or “Highly Confidential” in the State case will be treated as “Outside Attorneys’ Eyes Only” under the Protective Order in this case.

Respectfully submitted,

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