

**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,” collectively, with Sabre and Travelport, the “Defendants,” and collectively with Sabre, Travelport, and American, the “Parties”), hereby agree and stipulate as follows with respect to the production and use in this case of documents produced by Travelport or American in the state court matter pending in the Circuit Court of Cook County, Illinois as Case No. 2010CH-48028 (the “Illinois State Case”).

The Parties agree that any documents that have been produced by Travelport or American in the Illinois State Case shall be deemed also to be produced in this case upon delivery of copies to Sabre and Orbitz. No document produced by Travelport or American in the Illinois State Case shall be deemed produced in this case until Sabre and Orbitz, which are not parties to the Illinois State Case, are each served with a copy of that document and all other documents produced to date by the same party in the Illinois State Case. No document produced by any non party in the Illinois State Case shall be deemed produced in this case until Sabre and Orbitz are each served with a copy of that document and all other documents produced by the same non party in the Illinois State Case.

Travelport agrees to produce to each of Sabre and Orbitz all documents produced by Travelport in the Illinois State Case within seven days of the date of this stipulation, and for any future productions, within seven days of their production in the Illinois State Case. American agrees to produce to each of Sabre and Orbitz all documents produced by American in the Illinois State Case no later than by October 4, 2011, and for any future productions, within seven days of their production in the Illinois State Case.

Each of 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” or “Confidential Pursuant to Protective Order” under the protective order in the Illinois 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-Attorneys’ Eyes Only” or “Highly Confidential-Attorneys’ Eyes Only” under the protective order in the Illinois 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 Travelport in the Illinois State Case as “Confidential” or “Confidential Pursuant to Protective Order” under the protective order in the Illinois State Case will 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 Travelport in the Illinois State Case as “Confidential-Attorneys’ Eyes Only” or “Highly Confidential-Attorneys’ Eyes Only” under the protective order in the Illinois State Case

will be treated by American as Outside Attorneys' Eyes Only under the Protective Order in this case.

The Parties further agree that any documents and testimony designated by Travelport in the Illinois State Case as "Confidential," Confidential Pursuant to Protective Order," "Confidential-Attorneys' Eyes Only," or "Highly Confidential-Attorneys' Eyes Only" under the protective order in the Illinois State Case will be treated by Sabre and Orbitz as Outside Attorneys' Eyes Only under the Protective Order in this case.

Dated September [ ], 2011

Respectfully submitted,

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