

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

American Airlines, Inc.,

Plaintiff,

v.

Travelport Ltd., Travelport L.P. d/b/a
Travelport,

Orbitz Worldwide, LLC d/b/a Orbitz,

and

Sabre Inc., Sabre Holdings Corp., Sabre Travel
Int'l Ltd. d/b/a Sabre Travel Network,

Defendants.

Case No. 4:11-cv-00244-Y

Sabre's Response to American's Motion for Leave to Amend

Defendants Sabre Inc., Sabre Holdings Corp., and Sabre Travel Int'l Ltd. d/b/a Sabre Travel Network (collectively, "Sabre") respond as follows to the Plaintiff American Airlines Inc.'s Motion for Leave to File a Second Amended Complaint (Doc. 148, filed under seal):

Subject to the arguments in its previously-filed motion to dismiss (Doc. 97), and reserving all rights to amend or supplement that motion should the Court permit American to file its proposed amended allegations, Sabre neither opposes nor agrees to the relief sought by American in its motion for leave to file an amended complaint. However, Sabre agrees with Orbitz's and Travelport's request that, in the interest of efficiency, if the Court has invested substantial time and effort analyzing Defendants' pending motions to dismiss, the Court first rule

on those motions before permitting American to amend its pleadings.

DATED: November 10, 2011

Respectfully submitted,

/s/ Scott A. Fredricks

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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) on November 10, 2011.

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