

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

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|----------------------------|---|--------------------------------|
| AMERICAN AIRLINES, INC. | § | |
| | § | |
| vs. | § | CIVIL ACTION NO. 4:11-CV-244-Y |
| | § | |
| TRAVELPORT LIMITED, et al. | § | |

**AMERICAN AIRLINES, INC.’S OPPOSED MOTION
TO FILE SUPPLEMENTAL BRIEF IN SUPPORT OF ITS
MOTION TO EXTEND SCHEDULING ORDER DEADLINES**

American Airlines, Inc. (“American”) files this opposed motion to file a supplemental brief in support of its Motion to Extend Scheduling Order Deadlines to alert the Court to a new development since the filing of American’s reply brief on Tuesday January 24, 2012. Travelport claims that “AA does not and cannot establish that good cause exists to extend the discovery deadlines . . . in this case by five months.” (TVP Resp. at 10.) On Wednesday January 25, 2012, the day after American filed its reply brief, Travelport served American with a notice that it intended to serve seven additional third party subpoenas. A day later, on Thursday January 26, 2012, Travelport served American with a notice that it sought to serve thirty additional third party subpoenas. Then, on Thursday, February 2, 2012, Travelport served American with a notice that it sought to serve three additional third party subpoenas. In total, within a few days after American submitted its reply brief, Travelport significantly expanded the scope of discovery in this case by serving forty new third party subpoenas. (*See* App. Exs. A-B, D.) In addition, on January 30, 2012, Travelport served American with thirteen new document requests seeking a tremendous amount of data and other documents. (*See* App. Ex. C.). Party depositions have not begun and, as Travelport’s subpoenas reflect, significant third party depositions will also be necessary.

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Thus, American seeks to file the attached supplemental brief in support of its motion to modestly extend the current deadlines, including the March 1, 2012 deadline for document production and the May 15, 2012 deadline for overall discovery to be completed.

DATED: February 2, 2012

Respectfully submitted,

s/ Yolanda C. Garcia

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CERTIFICATE OF CONFERENCE

I hereby certify that counsel for American conferred with counsel for the defendants concerning the filing of this motion. Agreement could not be reached with counsel for Travelport, and counsel for Sabre and Orbitz did not respond to American's request to file the supplemental brief. Therefore, American believes this motion was opposed by all of the parties.

s/ Yolanda C. Garcia

Yolanda C. Garcia

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 2nd day of February 2012.

s/ Robert S. Velevis _____

Robert S. Velevis