

RE: AA requests

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RE: AA requests

Falls, Craig [craig.falls@dechert.com]

Sent: Wednesday, January 04, 2012 8:50 AM**To:** Chris.Yates@LW.com; rob.addy@bartlit-beck.com; Rothman, Richard; Feeney, Carolyn [carolyn.feeney@dechert.com]; dan.wall@lw.com; Brendan.McShane@lw.com; Weiner, Michael [Michael.Weiner@dechert.com]; Pentz, Justin [justin.pentz@dechert.com]; andrew.macnally@bartlit-beck.com; andrew.polovin@bartlit-beck.com; chris.lind@bartlit-beck.com; karma.giulianelli@bartlit-beck.com; sean.grimsley@bartlit-beck.com; skaiser@cgsh.com; gcary@cgsh.com; kreinker@cgsh.com; lwork-dembowski@cgsh.com**Cc:** pyetter@yettercoleman.com; Garcia, Yolanda; bbogle@hfblaw.com; rolandjohnson@hfblaw.com; MMoltenbrey@deweyleboeuf.com**Attachments:** PROPOSED Redacted Travelpo~1.pdf (351 KB)

Richard,

Travelport is also willing to extend the due date for AA's response to Travelport's motion to dismiss to January 19 if AA agrees to:

- (1) permit the DOJ to receive an unredacted version of Travelport's partial answer and counterclaims [Doc. 172] as requested by Michael Weiner's letter to MJ Moltenbrey on December 23rd; and
- (2) create a public version of Travelport's partial answer and counterclaims [Doc. 172] that redacts the parties' confidential information as requested by Michael Weiner's email to Rob Velevis on December 23rd.

Further to the second point, we are attaching a version of Travelport's partial answer and counterclaims that highlights suggested redactions to protect AA's confidential information. Please let us know if you agree with the redactions made in the attached. We may make additional redactions to protect Travelport's confidential information after discussing with our client.

With regard to your request for a status conference, Travelport agrees with Sabre and Orbitz that it would be more productive to hold a status conference after the briefing is completed on the pending motions to dismiss, AA's motion for reconsideration, and AA's motion for a five-month extension.

Regards,
Craig

From: Chris.Yates@LW.com [mailto:Chris.Yates@LW.com]**Sent:** Wednesday, January 04, 2012 12:25 AM**To:** rob.addy@bartlit-beck.com; richard.rothman@weil.com; Feeney, Carolyn; Dan.Wall@LW.com; brendan.mcshane@lw.com; Weiner, Michael; Pentz, Justin; Falls, Craig; andrew.macnally@bartlit-beck.com; andrew.polovin@bartlit-beck.com; chris.lind@bartlit-beck.com; karma.giulianelli@bartlit-beck.com; sean.grimsley@bartlit-beck.com; skaiser@cgsh.com; gcary@cgsh.com; kreinker@cgsh.com; lwork-dembowski@cgsh.com**Cc:** pyetter@yettercoleman.com; yolanda.garcia@weil.com; bbogle@hfblaw.com; rolandjohnson@hfblaw.com; MMoltenbrey@deweyleboeuf.com**Subject:** RE: AA requests

Richard:

Orbitz is willing to extend the time for American Airlines to respond to Orbitz's motion to dismiss from January 12 to January 19 if American Airlines agrees to extend the time for Orbitz to respond to American Airlines' motion to compel production of documents (filed during the holiday week) from January 19 to January 26. Please let me know if this is acceptable.

We agree with Sabre that a status conference would be most productive once the parties have completed the briefing on all pending motions.

<https://mail.weil.com/owa/yolanda.garcia>

Exhibit

A

M.Note&id=RgAAAAB9... 1/24/2012

Chris

From: Rob Addy [mailto:rob.addy@bartlit-beck.com]
Sent: Tuesday, January 03, 2012 7:37 AM
To: Rothman, Richard; Feeney, Carolyn; Yates, Chris (SF); Wall, Dan (SF); McShane, Brendan (SF); Welner, Michael; Pentz, Justin; Falls, Craig; Andrew MacNally; Andrew Polovin; Chris Lind; Karma Giulianelli; Sean Grimsley; Steven J. Kaiser (skaiser@cgsh.com); George S. Cary (gcary@cgsh.com); Kenneth Reinker (kreinker@cgsh.com); Larry C. Work-Dembowski (lwork-dembowski@cgsh.com)
Cc: pyetter@yettercoleman.com; Garcia, Yolanda; bbogle@hfblaw.com; rolandjohnson@hfblaw.com; Moltenbrey, MJ
Subject: RE: AA requests

Richard,

Sabre is willing to extend the due date for AA's response to our motion to dismiss to January 19 if AA is also willing to extend the due date for our response to your motion for reconsideration to the same date. Please let me know if this compromise is acceptable.

As for your request for a status conference, we think such a conference would be most productive once the parties have completed their briefing on the pending motions to dismiss, the motion for reconsideration, and American's motion for continuance. Thus, we are willing to join in your request for a status conference, provided that it is scheduled after the first week in February (when the briefing will be complete).

Sundeep K. (Rob) Addy
Bartlit Beck Herman Palenchar & Scott LLP
1899 Wynkoop St., Suite 800
Denver, CO 80202
(303) 592-3121 (office)
(303) 592-3140 (fax)
(512) 507-3973 (cell)

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From: Rothman, Richard [mailto:richard.rothman@weil.com]
Sent: Friday, December 30, 2011 3:57 PM
To: Feeney, Carolyn; Chris Lind; Rob Addy; skaiser@cgsh.com; chris.yates@lw.com; dan.wall@lw.com; Brendan.McShane@lw.com; Weiner, Michael; Pentz, Justin; Falls, Craig
Cc: pyetter@yettercoleman.com; Garcia, Yolanda; bbogle@hfblaw.com; rolandjohnson@hfblaw.com; Moltenbrey, MJ
Subject: RE: AA requests

That's fine Carrie. Happy New Year to all.

From: Feeney, Carolyn [mailto:carolyn.feeney@dechert.com]
Sent: Friday, December 30, 2011 4:44 PM
To: Rothman, Richard; chris.lind@bartlit-beck.com; rob.addy@bartlit-beck.com; skaiser@cgsh.com; chris.yates@lw.com; dan.wall@lw.com; Brendan.McShane@lw.com; Weiner, Michael; Pentz, Justin; Falls, Craig
Cc: pyetter@yettercoleman.com; Garcia, Yolanda; bbogle@hfblaw.com; rolandjohnson@hfblaw.com; Moltenbrey, MJ
Subject: RE: AA requests

Rich

As January 2 is a holiday, we will endeavor to get back to you the following day.

Happy new year to you too.

Regards,
Carrie

From: Rothman, Richard [<mailto:richard.rothman@weil.com>]
Sent: Friday, December 30, 2011 4:21 PM
To: chris.lind@bartlit-beck.com; rob.addy@bartlit-beck.com; skaiser@cqsh.com; chris.yates@lw.com; dan.wall@lw.com; brendan.mcshane@lw.com; Weiner, Michael; Feeney, Carolyn; Pentz, Justin; Falls, Craig
Cc: pyetter@yettercoleman.com; Garcia, Yolanda; bbogle@hfblaw.com; rolandjohnson@hfblaw.com; Moltenbrey, MJ
Subject: AA requests

I hope you've all had a good holiday. I'm writing with two requests: First, we request a short extension to respond to the motions to dismiss filed on December 22. Given the intervening holidays and the fact that American has to respond to three separate briefs, we would ask for a short extension from Thursday January 12th to Monday January 23. I would appreciate if you would let us know by noon on January 2 whether this is acceptable.

Second, we would like the defendants to join with American in requesting a prompt status conference with the Court so that we can ensure that the issues regarding the sufficiency of American's pleadings are decided in an efficient manner. As you know, American's motion for reconsideration is pending. In addition, we previously asked the Defendants to consent to our including in our second amended complaint factual allegations regarding the identities of travel agents with whom American asserts Defendants conspired, as well as the extent of foreclosure, in order to address certain points in the Court's decision with respect to the First Amended Complaint. We did not receive the consent of all the Defendants, and their motions now attack the Second Amended Complaint for omitting to include the kind of allegations American was and is prepared to include. We believe it will be inefficient and a waste of the Court's valuable time if the Court has to decide the pending motions before American has an opportunity to include these additional allegations and until the Court passes on the pending motion for reconsideration. In any event, we believe it would make sense to get the Court's view as to how it would like to proceed. Hence, our request for a prompt status conference. Please let us know if you're willing to join in this request.

Thanks for your consideration, and Happy New Year to all.



Richard A. Rothman

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<https://mail.weil.com/owa/yolanda.garcia@weil.com/?ae=Item&t=IPM.Note&id=RgAAAAB9...> 1/24/2012