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

| American Airlines, Inc., a Delaware corporation, | ) |                                 |
|--|---|---------------------------------|
| Plaintiff,                                       | ) |                                 |
| VS.  | ) | Civil Action No.: 4:11-cv-244-Y |
| Travelport Limited, et al.                       | ) |                                 |
| Defendants.                                      | ) |                                 |

## **STIPULATION**

Plaintiff American Airlines, Inc. ("American") and Defendants Travelport Limited and Travelport, LP (collectively, "Travelport," and collectively, with American, the "Parties"), hereby agree and stipulate as follows with respect to the production and use of American's discovery responses from the matter of *American Airlines, Inc.* v. *Sabre, Inc., et al.*, Case No. 067-249214-10, pending in Tarrant County, Texas (the "State Court Proceeding"), as well as with respect to the production and use of documents produced in this case in the State Court Proceeding:

- The Parties agree that any documents produced by Travelport in this case are deemed produced in response to American's subpoena in the State Court Proceeding upon delivery of copies to American in this case.
- 2. The Parties further agree that any documents designated by Travelport as "Confidential" or "Outside Attorneys' Eyes Only" under the protective order in this case shall be treated as "Highly Confidential" under the Protective Order in the State Court Proceeding.

3. The Parties further agree that any and all of American's responses to interrogatories and requests for admission served by Sabre in the State Court Proceeding may be used by Travelport in this case. Further in this regard, American agrees to serve a copy of any such existing responses on Travelport's counsel within two (2) business days of the full execution of this stipulation, and shall serve a copy of any such future responses on Travelport's counsel at the same time they are served on Sabre's counsel.

DATED: February 22, 2012

Respectfully submitted,

/s/ Yolanda C. Garcia

Yolanda C. Garcia State Bar No. 24012457 Michelle Hartmann State Bar No. 24032401 WEIL, GOTSHAL & MANGES LLP 200 Crescent Court, Suite 300

Dallas, TX 75201-6950 214.746.7700 214.746.7777 (Fax)

Bill F. Bogle State Bar No. 02561000 Roland K. Johnson State Bar No. 00000084 HARRIS, FINLEY & BOGLE, P.C.

777 Main Street, Suite 3600 Fort Worth, TX 76102 817.870.8700

817.332.6121 (Fax)

/s/ Carolyn Feeney

Walker C. Friedman State Bar No. 07472500 wcf@fsclaw.com

FRIEDMAN, SUDER & COOKE 604 E. 4th Street, Suite 200 Fort Worth, TX 76102 817.334.0144 817.334.0401 (Fax)

Michael L. Weiner michael.weiner@dechert.com **DECHERT LLP** 1095 Avenue of the Americas New York, NY 10036-6797 212.698.3608 212.698.3599 (Fax)

Carolyn Feeney
DECHERT LLP
2929 Arch Street
Philadelphia, PA 19104
215.994.4000
215.994.2222 (Fax)

R. Paul Yetter State Bar No. 22154200 Anna Rotman State Bar No. 24046761 YETTER COLEMAN LLP 909 Fannin, Suite 3600 Houston, TX 77010 713.632.8000 713.632.8002 (Fax)

#### Of Counsel:

## WEIL, GOTSHAL & MANGES LLP

Richard A. Rothman James W. Quinn 767 Fifth Avenue New York, NY 10153 212.310.8426 212.310.8285 (Fax)

## **DEWEY & LEBOEUF LLP**

M.J. Moltenbrey 1101 New York Ave. NW Washington, D.C. 20005 202.346.8738 202.346.8102 (Fax)

Attorneys for Plaintiff American Airlines, Inc.

Mike Cowie mike.cowie@dechert.com Craig Falls craig.falls@dechert.com **DECHERT LLP** 1775 I Street, NW Washington, D.C. 20006-2401 202.261.3300 202.261.3333 (Fax)

John T. Schriver
JTSchriver@duanemorris.com
Paul E. Chronis
pechronis@duanemorris.com **DUANE MORRIS LLP**Suite 3700
190 South LaSalle Street
Chicago, IL 60603-3433
312.499.6700
312.499.6701 (Fax)

Faith E. Gay
Steig D. Olson
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
51 Madison Avenue, 22nd Floor
New York, NY 10010
212.849.7000
212.849.7100 (Fax)

Attorneys for Defendants Travelport Ltd., Travelport, L.P.