

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

AMERICAN AIRLINES, INC.,)	
)	
Plaintiff,)	
)	Case No. 4:11-cv-00244-Y
vs.)	
)	
TRAVELPORT LIMITED, et al.,)	
)	
Defendants.)	
)	

**UNOPPOSED MOTION FOR CLARIFICATION BY DEFENDANTS
TRAVELPORT LIMITED, TRAVELPORT, LP, AND ORBITZ WORLDWIDE, LLC**

Defendants Travelport Limited and Travelport, LP (collectively “Travelport”) and Orbitz Worldwide, LLC (“Orbitz”) respectfully seek clarification that the Court’s February 22, 2012 order appointing a mediator and directing counsel for “each party” to contact the mediator within seven days [Doc. 238] applies only to Plaintiff American Airlines, Inc. (“AA”) and Defendants Sabre Holdings Corporation, Sabre, Inc., and Sabre Travel International Ltd. (collectively “Sabre”). As reflected in the attached Certificate of Conference, this motion is unopposed.

The Court’s August 1, 2011 Order of Referral for Mediation [Doc. 122] directed the parties to agree upon a mediator and select a mediation date by March 1, 2012. On February 6, 2012, the Court accelerated these deadlines with respect to *claims between AA and Sabre*, ordering AA and Sabre to select a mediator by February 21. [Doc. 220.] As to claims between AA and the other defendants – *i.e.*, Travelport and Orbitz – the original deadlines remained unchanged. [See *id.*]

On February 21, 2012, AA and Sabre filed a notice informing the Court of the identity of the mediator they had selected. [Doc. 234.] Travelport and Orbitz were not asked to join in this

notice, nor were they consulted as to the selection of AA and Sabre's mediator, because all parties understood that the original, March 1 deadline applied to the claims between AA and Travelport and the claims between AA and Orbitz.

Although the Alternate Dispute Resolution Summary appended to the Court's February 22, 2012 Order [Doc. 238] notes that the summary applies "[i]n reference to mediation between American Airlines and Sabre only," the Court's use of the terms "each party" or "parties" in the Order itself could be interpreted to refer to Travelport and Orbitz in addition to AA and Sabre. Accordingly, Travelport and Orbitz respectfully request entry of an order clarifying that the Court's February 22, 2012 Order [Doc. 238] applies only to AA and Sabre. Pursuant to the Court's Order of Referral to Mediation [Doc. 122], Travelport and Orbitz will meet and confer with AA regarding the selection of a mediator and report to the Court by March 1.

February 24, 2012

Respectfully submitted,

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CERTIFICATE OF CONFERENCE

After consultation with counsel for Plaintiff American Airlines, Inc. and Defendants Sabre Holdings Corporation, Sabre, Inc., and Sabre Travel International Ltd., I hereby certify that this motion is unopposed.

/s/ Carolyn H. Feeney _____
Carolyn H. Feeney

CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of February, 2012, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Northern District of Texas, Fort Worth Division, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Craig G. Falls _____
Craig G. Falls