

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

American Airlines, Inc.	§	
	§	
Plaintiff,	§	
	§	
v.	§	CIVIL ACTION NO. 4:11-CV-244-Y
	§	
Travelport Limited, et al.	§	
	§	
Defendants.	§	

**AGREED MOTION FOR ENTRY OF A
STIPULATED SUPPLEMENTAL PROTECTIVE ORDER**

Pursuant to Fed. R. Civ. P. 26(c)(1), Plaintiff American Airlines, Inc., Defendants Travelport Limited, Travelport, LP, Sabre, Inc., Sabre Holdings Corp., and Sabre Travel International Ltd., and Orbitz Worldwide, LLC (collectively, the “Parties”), by and through their undersigned counsel, respectfully request that the Court sign and enter the attached Stipulated Supplemental Protective Order, for which good cause exists.

Non-party BCD Travel USA LLC (“BCD”) has produced documents in response to a subpoena. The documents contain competitive, proprietary and otherwise commercially sensitive information, public disclosure of which would be harmful to BCD. BCD has therefore requested entry of the accompanying supplemental protective order as a condition of its production of documents in response to the subpoena.

Accordingly, the Parties respectfully request that the Court enter the attached proposed Stipulated Supplemental Protective Order.

AGREED TO IN FORM AND SUBSTANCE AND ENTRY REQUESTED:

s/ Michelle Hartmann

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CERTIFICATE OF SERVICE

I hereby certify that on March 9, 2012, a true and correct copy of the foregoing was filed with the Clerk of this Court using the CM/ECF system, which will serve a notice of filing upon the filing users.

s/Michelle Hartmann

Michelle Hartmann