

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.	§	

**STIPULATED SUPPLEMENTAL PROTECTIVE ORDER**

Plaintiff American Airlines (“American”), Defendants Sabre, Inc., Sabre Holdings Corporation, Sabre Travel International, Ltd., Travelport Limited, Travelport L.P., Orbitz Worldwide, LLC (collectively, the “Parties”) and non-party BCD Travel USA LLC (“BCD”), hereby agree and stipulate that BCD’s production of documents and information in response to discovery requests that may be served upon BCD in this matter (“BCD Discovery Material”) shall be governed by the protective order entered on August 15, 2011 (Dkt. 130) (the “Protective Order”).

Without limiting any other restrictions in the Protective Order, the Parties and BCD agree that BCD Discovery Material may be offered in evidence at trial or hearing in this proceeding, subject to the applicable rules of evidence, provided that the party offering the evidence (the “Offering Party”) provides reasonable notice to BCD in order to allow BCD and the Offering Party to engage in a good faith effort to determine whether a redacted version of the BCD Discovery Material will suffice for the trial or hearing. BCD may move the Court for an order that evidence, including documents and

testimony, be received in camera or under other conditions to prevent unnecessary disclosure of BCD Discovery Material. Prior to trial or to a hearing in open court, the Court may determine what protection, if any, will be afforded to such information at the trial or hearing. In the event the Offering Party cannot practicably provide notice to BCD, the Offering Party shall, prior to offering in evidence any BCD Discovery Material, move the Court for an order that evidence, including documents and testimony, be received in camera or under other conditions to prevent unnecessary disclosure of BCD Discovery Material.

**Unless this order includes a clause that explicitly states that a particular local civil rule is modified as applied to this case, nothing in this order shall be construed to modify the provisions, operation, or effect of any local civil rule of this court.**

SIGNED \_\_\_\_\_, \_\_\_\_\_, 2012

\_\_\_\_\_  
TERRY R. MEANS  
UNITED STATES DISTRICT JUDGE

AGREED TO IN FORM AND SUBSTANCE AND ENTRY REQUESTED:

s/ Michelle Hartmann

Bill F. Bogle  
State Bar No. 06256100  
Roland K. Johnson  
State Bar No. 00000084  
HARRIS, FINLEY & BOGLE, P.C.  
777 Main Street, Suite 3600  
Fort Worth, Texas 76102  
(817) 870-8700  
(817) 332-6121 (Fax)

R. Paul Yetter  
State Bar No. 22154200  
Anna Rotman  
State Bar No. 24046761  
YETTER COLEMAN LLP  
909 Fannin, Suite 3600  
Houston, Texas 77010  
(713) 632-8000  
(713) 632-8002 (Fax)

Michelle Hartmann  
State Bar No. 24032401  
WEIL, GOTSHAL & MANGES LLP  
200 Crescent Court, Suite 300  
Dallas, Texas 75201-6950  
214.746.7700  
214.746.7777 (Fax)

M.J. Moltenbrey  
DEWEY & LEBOEUF LLP  
1101 New York Avenue, N.W.  
Washington, D.C. 20005  
(202) 346-8738  
(202) 346-8102 (Fax)

Richard A. Rothman (pro hac vice)  
WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153  
(212) 310-8426  
(212) 310-8285 (Fax)

**ATTORNEYS FOR PLAINTIFF**

s/ Joel Bush

Joel Bush  
George Bar No. 098775  
KILPATRICK TOWNSEND &  
STOCKTON, LLP  
1100 Peachtree Street, Suite 2800  
Atlanta, Georgia 30309  
(404) 815-6074  
(404) 541-3143 (Fax)

**ATTORNEYS FOR NON-PARTY BCD  
TRAVEL USA LLC**

s/ Craig Falls

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)

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)

Carolyn H. Feeney  
[carolyn.feeney@dechert.com](mailto:carolyn.feeney@dechert.com)  
Justin N. Pentz  
[justin.pentz@dechert.com](mailto:justin.pentz@dechert.com)  
**DECHERT LLP**  
2929 Arch Street  
Philadelphia, PA 19104  
215.994.4000  
215.994.2222 (Fax)

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)

Faith E. Gay  
[faithgay@quinnemanuel.com](mailto:faithgay@quinnemanuel.com)  
Steig D. Olson  
[steigolson@quinnemanuel.com](mailto:steigolson@quinnemanuel.com)  
**QUINN EMANUEL URQUHART &  
SULLIVAN, LLP**  
51 Madison Avenue, 22nd Floor  
New York, New York 10010  
212.849.7000  
212.849.7100 (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)

**ATTORNEYS FOR DEFENDANTS  
TRAVELPORT LTD., AND TRAVELPORT,  
L.P.**

/s/ Brendan McShane

Christopher S. Yates

[Chris.Yates@lw.com](mailto:Chris.Yates@lw.com)

Daniel M. Wall

[Dan.Wall@lw.com](mailto:Dan.Wall@lw.com)

Brendan A. McShane

[Brendan.McShane@lw.com](mailto:Brendan.McShane@lw.com)

**LATHAM & WATKINS LLP**

505 Montgomery Street, Suite 2000

San Francisco, CA 94111-6538

415.391.0600

415.395.8095 (Fax)

John J. Little

[jlittle@jpf-law.com](mailto:jlittle@jpf-law.com)

**LITTLE PEDERSEN FANKHAUSER LLP**

901 Main Street, Suite 4110

Dallas, TX 75202-3714

214.573.2300

214.573.2323 (Fax)

**ATTORNEYS FOR DEFENDANT  
ORBITZ WORLDWIDE, LLC**

s/ Scott A. Fredricks

Ralph H. Duggins  
Texas Bar No. 06183700  
rduggins@canteyhanger.com  
Scott A. Fredricks  
Texas Bar No. 24012657  
sfredricks@canteyhanger.com  
Philip A. Vickers  
Texas Bar No. 24051699  
pvickers@canteyhanger.com  
**CANTEY HANGER LLP**  
Cantey Hanger Plaza  
600 West 6<sup>th</sup> Street, Suite 300  
Fort Worth, TX 76102-3685  
817.877.2800  
817.877.2807 (Fax)

Donald E. Scott  
Colorado Bar No. 21219,  
Illinois Bar No. 2531321  
don.scott@bartlit-beck.com  
Karma M. Giulianelli  
Colorado Bar No. 30919,  
California Bar No. 184175  
karma.giulianelli@bartlit-beck.com

Sean C. Grimsley  
Colorado Bar No. 36422,  
California Bar No. 216741  
sean.grimsley@bartlit-beck.com  
Sundeep K. (Rob) Addy  
Colorado Bar No. 38754  
rob.addy@bartlit-beck.com

**BARTLIT BECK HERMAN PALENCHAR  
& SCOTT LLP**  
1899 Wynkoop Street, 8<sup>th</sup> Floor  
Denver, CO 80202  
303.592.3100  
303.592.3140 (Fax)

Chris Lind  
Illinois Bar No. 6225464,  
Colorado Bar No 27719  
chris.lind@bartlit-beck.com  
Andrew K. Polovin  
Illinois Bar No. 6275707  
andrew.polovin@bartlit-beck.com  
**BARTLIT BECK HERMAN PALENCHAR &  
SCOTT LLP**  
54 West Hubbard Street, Suite 300  
Chicago, IL 60610  
312.494.4400  
312.494.4440 (Fax)

George S. Cary  
gcary@cgsh.com  
Steven J. Kaiser  
skaiser@cgsh.com  
**CLEARY GOTTlieb STEEN & HAMILTON LLP**  
2000 Pennsylvania Ave., N.W.  
Washington, D.C. 20006  
202.974.1920  
202.974.1999 (Fax)

**ATTORNEYS FOR SABRE INC., SABRE  
HOLDINGS CORPORATION, AND SABRE  
TRAVEL INT'L LTD. D/B/A SABRE  
TRAVEL NETWORK**