

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

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AMERICAN AIRLINES, INC.,	)	
	)	
Plaintiff,	)	
	)	Case No. 4:11-cv-244-Y
vs.	)	
	)	
TRAVELPORT LIMITED, et al.,	)	
	)	
Defendants.	)	

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**JOINT MOTION BY PLAINTIFF AMERICAN  
AIRLINES, INC. AND DEFENDANTS TRAVELPORT LIMITED,  
TRAVELPORT, LP, AND ORBITZ WORLDWIDE LLC TO  
EXTEND DEADLINES TO EXCHANGE EXPERT REPORTS**

Plaintiff American Airlines, Inc. (“American”) and Defendants Travelport Limited and Travelport, LP (collectively “Travelport”), and Orbitz Worldwide, LLC (“Orbitz”) respectfully move for a two-month extension of the existing expert disclosure deadlines. Specifically, American, Travelport, and Orbitz request that the current deadlines (*see* Doc. 209) be adjusted so that expert disclosures for each party plaintiff<sup>1</sup> will be due June 15, 2012, expert disclosures for each party defendant will be due on July 16, 2012, and rebuttal expert disclosures will be due August 15, 2012. The requested extension will not affect any of the other dates in the schedule.

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<sup>1</sup> Travelport agrees that it is a “party plaintiff” with respect to its counterclaims.

The grounds for this motion are explained in the accompanying brief, which is incorporated herein by reference.

Dated: March 14, 2012

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**CERTIFICATE OF CONFERENCE**

Pursuant to Local Rule 7.1(a) & (b), I hereby certify that I conferred with counsel for all other parties regarding the foregoing motion.

Defendants Sabre, Inc., Sabre Holdings Corporation, and Sabre Travel International, Ltd. (collectively "Sabre") oppose the motion insofar as it seeks an extension of expert disclosure deadlines relating to American's claims against Sabre, but do not oppose the motion insofar as it seeks an extension of expert disclosure deadlines relating to American's claims against Travelport and Orbitz or Travelport's claims against American. Conferences were held on March 5 and 6, 2012; the attorneys conferring were Carolyn H. Feeney for Travelport and Sundeep K. (Rob) Addy and Andrew Polovin for Sabre.

Plaintiff American Airlines, Inc. and Defendant Orbitz Worldwide, LLC join the motion.

Dated: March 14, 2012

/s/ Carolyn H. Feeney  
Carolyn H. Feeney

**CERTIFICATE OF SERVICE**

I hereby certify that on the 14th day of March, 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/ Walker C. Friedman  
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