

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

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

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**BRIEF IN SUPPORT OF 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”) seek a two-month extension of the existing expert disclosure deadlines, so as to realign the expert disclosure schedule with the rest of the schedule now that the Court has moved several other dates in the Initial Scheduling Order by approximately two months. (*See* Order Granting in Part and Denying in Part Motion to Extend [Doc. 245].)

On January 30, 2012, all parties filed an agreed motion stipulating to extend the expert disclosure deadlines in the Initial Scheduling Order by approximately two months [Doc. 208]. The purpose of this motion was to make the parties’ initial expert disclosures due close to the end of the fact discovery period, rather than in the middle of discovery, when key depositions would still be outstanding, and indeed document productions would still be ongoing. The Court granted the motion on January 31, 2012 [Doc. 209].

On February 28, 2012, the Court issued an order [Doc. 245] extending most remaining deadlines – including the fact discovery deadlines – by two months. In light of the parties’ prior stipulation, however, the order did not adjust the expert disclosure deadlines. The Court’s February 28 order thus recreated the situation that led to the parties’ stipulation to move the expert disclosure deadlines in the first place: under the current schedule, the parties’ initial expert disclosures will be due months before fact discovery is substantially complete.

Accordingly, American, Travelport, and Orbitz respectfully request that the current expert disclosure deadlines be extended by two months, so that they will fall where the parties previously stipulated to put them in relation to other deadlines. If this motion is granted, 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. Consistent with Local Rule 7.1(c), a proposed order accompanies this motion.

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

Dated: March 14, 2012

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Respectfully submitted,

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**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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