

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

AMERICAN AIRLINES, INC.,

Plaintiff,

vs.

TRAVELPORT LIMITED, et al.,

Defendants.

Case No. 4:11-cv-00244-Y

AGREED MOTION TO AMEND PROTECTIVE ORDER

Defendants Travelport Limited; Travelport LP; Sabre Inc.; Sabre Holdings Corp.; Sabre Travel International LTD; and Orbitz Worldwide, LLC; and Plaintiff American Airlines, Inc. (collectively “the Parties”), through their undersigned counsel, hereby jointly file this agreed motion to amend Paragraph 15 of the Stipulated Protective Order [Doc. 130] entered by the Court on August 15, 2011. In particular, to facilitate the preparation of expert disclosures by economists retained by the Parties, the Parties respectfully request that Paragraph 15 of the Stipulated Protective Order be amended to read as follows:

15. Prior to disclosure of any Designated Material to any person identified in paragraphs 8(b), (c), (e), (g) or (h) or 12 (b) or (c), such person shall be provided with a copy of this Protective Order, which he or she shall read and upon reading shall sign a Certification in the form attached hereto as Exhibit A, acknowledging that he or she has read this Protective Order and shall abide by its terms. Counsel for the party seeking to disclose Designated Material to any person identified in paragraphs 8(b) or (g) or 12(c) shall then serve all other

parties in this Proceeding with a copy of the executed Certification. Counsel for the party seeking to disclose Designated Material to any person identified in paragraphs 8(e) or (h), or any person identified in paragraphs 8(c) or 12(b) other than the parties' outside economists, shall then serve all other parties in this Proceeding with a copy of the executed Certification and shall refrain from disclosing Designated Material for one business day, during which times the other parties may raise objections. If such an objection is raised, counsel for the party seeking to disclose Designated Material shall not do so until the matter is resolved by the Court. Failure to raise an objection within 24 hours does not waive the right of a party to lodge an objection at a later date and seek relief from the Court. Executed Certifications signed by outside economists shall be maintained by the party retaining them, but need not be served on the other parties. Persons who come into contact with Designated Material for clerical, administrative, paralegal, stenographic or court reporting purposes are not required to execute acknowledgements.

Exhibit A to this agreed motion contains a full version of the proposed Amended Stipulated Protective Order. Exhibit B to this agreed motion contains a redline comparison of the Stipulated Protective Order and the proposed Amended Stipulated Protective Order.

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 and its exhibits 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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