

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, Inc. (“American”), and defendants Sabre Inc., Sabre Holdings Corporation, Sabre Travel International Ltd., Travelport Limited, Travelport L.P., and Orbitz Worldwide, LLC (“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 (doc. 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 March 15, 2012.

  
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TERRY R. MEANS  
UNITED STATES DISTRICT JUDGE

AGREED TO IN FORM AND SUBSTANCE AND ENTRY REQUESTED:

s/ Michelle Hartmann

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