

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 Air Canada, Inc. (“Air Canada”), hereby agree and stipulate that Air Canada’s production of documents and information in response to discovery requests that may be served upon Air Canada in this matter (“Air Canada Discovery Material”) shall be governed by the First Amended Stipulated Protective Order entered on March 20, 2012 (Dkt. 267) (the “Protective Order”).

Pursuant to Paragraph 2 of the Protective Order, Air Canada hereby agrees to be bound by the terms and conditions of the Protective Order and to become a Supplying Party for purposes of the Protective Order.

The Parties and Air Canada further stipulate and agree that Air Canada does not waive (and expressly preserves) its objections to personal jurisdiction before this Court and any other state or federal court in Texas.

**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/ Seema Tendolkar

David J. Drez III (SBN 24007127)  
Seema Tendolkar (SBN 24053509)  
David G. Gamble (SBN 24040946)  
WICK PHILLIPS GOULD & MARTIN, LLP  
100 Throckmorton St., Suite 550  
Fort Worth, TX 76102  
Telephone: (817) 332-7788  
Facsimile: (817) 332-7789

**ATTORNEYS FOR NON-PARTY AIR  
CANADA, INC.**

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  
Justin N. Pentz  
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  
Christian D. Tucker  
State Bar No. 00795690  
tucker@fsclaw.com  
**FRIEDMAN, SUDER & COOKE**  
604 E. 4th Street, Suite 200  
Fort Worth, TX 76102  
817.334.0144  
817.334.0401 (Fax)

John T. Schriver  
JTSchriver@duanemorris.com  
Paul E. Chronis

s/ Brendan A. 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  
[jjlittle@lpf-law.com](mailto:jjlittle@lpf-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**

pechronis@duanemorris.com

**DUANE MORRIS LLP**

Suite 3700

190 South LaSalle Street

Chicago, IL 60603-3433

312.499.6700

312.499.6701 (Fax)

Faith E. Gay

faithgay@quinnemanuel.com

Steig D. Olson

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)

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

/s/ Sundeep K. Addy

Scott A. Fredricks  
Texas Bar No. 24012657  
sfredricks@canteyhanger.com  
Ralph H. Duggins  
Texas Bar No. 06183700  
rduggins@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)

Andrew K. Polovin  
Illinois Bar No. 6275707  
andrew.polovin@bartlit-beck.com  
Katherine M. Swift  
Illinois Bar No. 6290878  
kate.swift@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)

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**