

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

AMERICAN AIRLINES, INC.,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 4:11-cv-00244-Y
)	
TRAVELPORT LIMITED, et al.,)	Relates to Motions Referred to
)	Magistrate Judge Cureton
Defendants.)	

**STIPULATION OF AMERICAN AIRLINES AND TRAVELPORT
REGARDING TRAVELPORT’S MOTION TO COMPEL DISCOVERY
AND FOR SANCTIONS (DOC. 229) AND AMERICAN’S MOTION TO
COMPEL TRAVEPORT’S PRODUCTION OF DOCUMENTS (DOC. 280)**

On April 10, 2012, the Court issued two orders relating to the Travelport Defendants’ Motion to Compel Discovery and for Sanctions (Doc. 229) (“Travelport’s Motion”) and Plaintiff American Airlines, Inc.’s Motion to Compel Travelport’s Production of Documents (Doc. 280) (“American’s Motion,” and with Travelport’s Motion, the “Motions”). The Order relating to Travelport’s Motion (Doc. 292) required American to produce all documents and information that it planned to produce in response to Travelport’s Motion to Compel no later than April 20, 2012. The Order relating to American’s Motion (Doc. 293) required the parties to confer and make a good faith effort to resolve the discovery dispute no later than April 20, 2012. The parties, having met and conferred repeatedly regarding these Motions, hereby agree and stipulate as follows:

1. Travelport and American have resolved the vast majority of the issues raised by their respective Motions. For the limited issues that have not been resolved, Travelport and American have reached agreement in principle and have made

various commitments, but the parties still have to produce documents or data as promised.¹

2. Accordingly, Travelport and American presently do not have any dispute related to either Travelport's Motion or American's Motion. Nonetheless, to the extent either Travelport or American does not live up to its respective commitments, the parties reserve their rights to raise the issue with the Court and seek relief on an expedited basis. The parties agree that they will work in good faith to provide all documents, data, or software access as contemplated herein by May 1, 2012.

SIGNED _____, _____, 2012

JEFFREY L. CURETON
UNITED STATES MAGISTRATE JUDGE

¹ The issues that remain pending are as follows: (1) Travelport has agreed to produce certain documents responsive to specific requests in American's Third and Fourth Sets of Requests for Production of Documents and to provide access to Travelport software and documents as requested in American's Fifth Set of Request for Production of Documents; (2) American has agreed to resolve issues related to overlay files provided to Travelport to correct issues in the format of American's productions caused by vendor error; and (3) American has agreed to produce data sufficient to show (to the extent that such data exists) the information responsive to Request Nos. 5-8 of Travelport's Second Set of Document Requests.

AGREED TO IN FORM AND SUBSTANCE AND ENTRY REQUESTED:

Dated: April 23, 2012

/s/ Michael L. Weiner

Michael L. Weiner
michael.weiner@dechert.com

DECHERT LLP
1095 Avenue of the Americas
New York, New York 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 Feeney
carolyn.feeney@dechert.com

Justin Pentz
justin.pentz@dechert.com

DECHERT LLP
2929 Arch Street
Philadelphia, PA 19104
215.994.4000
215.994.2222 (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)

/s/ Yolanda Cornejo Garcia

Yolanda Cornejo Garcia

R. Paul Yetter
State Bar No. 22154200
pyetter@yettercoleman.com
Anna Rotman
State Bar No. 24046761
arotman@yettercoleman.com
YETTER COLEMAN LLP
909 Fannin, Suite 3600
Houston, Texas 77010
713.632.8000
713.632.8002 (fax)

Yolanda Cornejo Garcia
State Bar No. 24012457
yolanda.garcia@weil.com
Michelle Hartmann
State Bar No. 24032401
michelle.hartmann@weil.com
WEIL, GOTSHAL & MANGES LLP
200 Crescent Court, Suite 300
Dallas, Texas 75201-6950
214.746.7700
214.746.7777 (fax)

Bill Bogle
State Bar No. 02561000
bbogle@hfblaw.com
Roland K. Johnson
State Bar No. 00000084
rolandjohnson@hfblaw.com

HARRIS, FINLEY & BOGLE, P.C.
777 Main Street, Suite 3600
Fort Worth, Texas 76102
817.870.8700
817.332.6121 (fax)

Attorneys for Plaintiff American Airlines, Inc.

Walker C. Friedman
State Bar No. 07472500
wcf@fsclaw.com
Christian D. Tucker
State Bar No. 00795690
tucker@fsclaw.com

FRIEDMAN, SUDER & COOKE, P.C.

Tindall Square Warehouse No. 1
604 East 4th Street, Suite 200
Fort Worth, Texas 76102
817.334.0400
817.334.0401 (Fax)

**ATTORNEYS FOR DEFENDANTS
TRAVELPORT LIMITED and
TRAVELPORT, LP**

Of Counsel to Travelport Defendants:

John T. Schriver
JTSchriver@duanemorris.com
Paul E. Chronis
pechronis@duanemorris.com
DUANE MORRIS LLP
190 South LaSalle Street, Suite 3700
Chicago, Illinois 60603-3433
312.499.6700
312.499.6701 (Fax)

Of Counsel to Plaintiff:

Richard A. Rothman
Richard.rothman@weil.com
James W. Quinn
james.quinn@weil.com
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
212.310.8426
212.310.8285 (fax)

M.J. Moltenbrey
mmoltenbrey@dl.com
DEWEY & LEBOEUF LLP
1101 New York Avenue, N.W.
Washington, D.C. 20005
202.346.8738
202.346.8102 (fax)

CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of April, 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/ Justin N. Pentz
Justin N. Pentz