

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.

Dated: April 24, 2012

Respectfully Submitted,

/s/ Michael L. Weiner

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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.

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CERTIFICATE OF SERVICE

I hereby certify that on the 24th 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
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