

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

AMERICAN AIRLINES, INC.	§	
	§	
vs.	§	CIVIL ACTION NO. 4:11-CV-244-Y
	§	
TRAVELPORT LIMITED, et al.	§	

**UNOPPOSED MOTION FOR ENTRY OF A
STIPULATED SUPPLEMENTAL PROTECTIVE ORDER**

Pursuant to Fed. R. Civ. P. 26(c)(1)(G), Plaintiff American Airlines, Inc. (“American”) requests that the Court sign and enter the attached Stipulated Supplemental Protective Order, for which good cause exists.

American has issued on Spirit Airlines, Inc. (“Spirit”) a Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action dated July 6, 2011 (the “Subpoena”). Spirit Airlines has produced documents with a confidentiality designation that is based on the protective order in *American Airlines, Inc. v. Sabre Inc. et al.*, No. 067-249214-10, which is pending in the 67th Judicial District Court of Tarrant County, Texas (“the State Proceeding”). The documents produced contain competitive, proprietary and otherwise commercially sensitive information, public disclosure of which would be harmful to Spirit. Spirit has therefore requested entry of the accompanying supplemental protective order as a condition of its production of documents in response to the Subpoena. Spirit seeks to avail itself of the “Outside Attorneys’ Eyes Only” protection of the First Amended Stipulated Protective Order entered in this case on March 20, 2012 (Dkt. 267), as well as any subsequent amendments or modifications thereto.

Accordingly, American requests, on Spirit's behalf, that the Court enter the attached proposed Stipulated Supplemental Protective Order.

Dated: April 30, 2012

Respectfully submitted,

/s/ Michelle Hartmann

Yolanda C. Garcia
State Bar No. 24012457
Michelle Hartmann
State Bar No. 24032401
Robert S. Velevis
State Bar No. 24047032
WEIL, GOTSHAL & MANGES LLP
200 Crescent Court, Suite 300
Dallas, Texas 75201-6950
(214) 746-7700
(214) 746-7777 (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)

Bill F. Bogle
State Bar No. 02561000
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)

**ATTORNEYS FOR PLAINTIFF
AMERICAN AIRLINES, INC.**

OF COUNSEL:

Richard A. Rothman (pro hac vice)
Robert Berezin (pro hac vice)
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
(212) 310-8426
(212) 310-8285 (Fax)

MJ Moltenbrey (pro hac vice)
DEWEY & LEBOEUF LLP
1101 New York Avenue, N.W.
Washington, D.C. 20005
(202) 346-8738
(202) 346-8102 (Fax)

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule 7.1(h), undersigned counsel for American certifies that counsel for Defendants have been consulted and that counsel for Defendants do not oppose the relief sought in this motion.

/s/ Michelle Hartmann _____

Michelle Hartmann

CERTIFICATE OF SERVICE

I hereby certify that on April 30, 2012, a true and correct copy of the foregoing was filed with the Clerk of this Court using the CM/ECF system, which will serve a notice of filing upon the filing users.

/s/ Victoria Neave _____

Victoria Neave