

**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 Expedia, Inc. (“Expedia”) a Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action dated July 5, 2011 (the “Subpoena”). Expedia timely filed objections to certain requests, but is providing documents to certain requests for which it does not object. The documents to be produced are likely to contain competitive, proprietary and otherwise commercially sensitive information, public disclosure of which would be harmful to Expedia. Expedia has therefore requested entry of the accompanying supplemental protective order as a condition of its production of documents in response to the Subpoena.

Accordingly, American requests on Expedia’s behalf that the Court enter the proposed Stipulated Supplemental Protective Order, attached hereto as Exhibit 1.

Dated: June 12, 2012

Respectfully submitted,

/s/ Michelle Hartmann

Yolanda Garcia
State Bar No. 24012457
yolanda.garcia@weil.com
Michelle Hartmann
State Bar No. 24032402
michelle.hartmann@weil.com
Robert S. Velevis
State Bar No. 24047032
robert.velevis@weil.com
Weil, Gotshal & Manges LLP
200 Crescent Court, Suite 300
Dallas, TX 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, TX 76102
817.870.8700
817.332.6121 (Fax)

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, TX 77010
713.632.8000
713.632.8002 (Fax)

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

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, NY 10153
212.310.8426
212.310.8285 (Fax)

MJ Moltenbrey
mjmoltenbrey@paulhastings.com
Paul Hastings
875 15th Street, N.W.
Washington, DC 20005
202.551.1700
202.551.1705 (Fax)

CERTIFICATION

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

/s/ Michelle Hartmann
Michelle Hartmann

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 12, 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/ Michelle Hartmann
Michelle Hartmann

EXHIBIT 1

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. §

STIPULATED SUPPLEMENTAL PROTECTIVE ORDER

Plaintiff American Airlines, Inc. (“American”) and non-party Expedia, Inc. (“Expedia”), upon which American has issued a Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action (the “Subpoena”) dated July 5, 2011, hereby agree and stipulate that Expedia’s production of documents and information in response to the Subpoena and any additional discovery requests that may be served by American upon Expedia in this matter (“Expedia Discovery Material”) shall be governed by the First Amended Stipulated Protective Order (“Amended Protective Order”) as approved by this Court on March 20, 2012 (Docket No. 267) as well as any subsequent amendments or modifications thereto.

In addition to the protections and provisions set forth in the Amended Protective Order, which is wholly incorporated herein by reference, American and Expedia stipulate as follows: (1) Expedia Discovery Material designated as “Highly Confidential” will be construed as equivalent to “Outside Attorneys’ Eyes Only Information (No. 4:11-cv-00244-Y)” pursuant to the Amended Protective Order; and (2) Expedia Discovery Material may also be produced in response to the Subpoena Duces Tecum issued by American in *American Airlines, Inc. v. Sabre Inc. et al.*, Judicial District of Tarrant County, Texas, 67th Judicial District, No. 067-249214-10 (the “State Proceeding”), and may be used in the State Proceeding.

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: June __, 2012

HONORABLE TERRY R. MEANS
UNITED STATES DISTRICT JUDGE

Respectfully submitted,

/s/ Michelle Hartmann

Yolanda Garcia
State Bar No. 24012457
yolanda.garcia@weil.com
Michelle Hartmann
State Bar No. 24032402
michelle.hartmann@weil.com
Robert S. Velevis
State Bar No. 24047032
robert.velevis@weil.com
Weil, Gotshal & Manges LLP
200 Crescent Court, Suite 300
Dallas, TX 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, TX 76102
817.870.8700
817.332.6121 (Fax)

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, TX 77010
713.632.8000
713.632.8002 (Fax)

OF COUNSEL:

Richard A. Rothman
richard.rothman@weil.com
James W. Quinn

/s/ Melinda R. Burke

Melinda R. Burke
State Bar No. 03403030
Lori R. Thomas
State Bar No. 19857300
Roland P. Schafer
State Bar No. 24056271
Shannon, Gracey, Ratliff & Miller, L.L.P.
777 Main Street, Suite 3800
Fort Worth, Texas 76102
817.336.9333
817.336-3735 (Fax)

**ATTORNEYS FOR NON-PARTY
EXPEDIA, INC.**

james.quinn@weil.com
Weil, Gotshal & Manges LLP
767 Fifth Avenue
New York, NY 10153
212.310.8426
212.310.8285 (Fax)

MJ Moltenbrey
mjmoltenbrey@paulhastings.com
Paul Hastings
875 15th Street, N.W.
Washington, DC 20005
202.551.1700
202.551.1705 (Fax)

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