

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

AMERICAN AIRLINES, INC.,)	
)	
Plaintiff,)	
)	Case No. 4:11-cv-00244-Y
vs.)	
)	
TRAVELPORT LIMITED, et al.,)	
)	
Defendants.)	
)	

JOINT MOTION TO EXTEND DEADLINES

Plaintiff American Airlines, Inc. (“American”); and Defendants Travelport Limited; Travelport, LP; Sabre Inc.; Sabre Holdings Corp.; Sabre Travel International LTD; and Orbitz Worldwide, LLC (collectively “Defendants”, and together with American “the Parties”), through their undersigned counsel, respectfully move for an extension of certain case deadlines as discussed in further detail below. In addition, should the Court grant this Motion, the Parties respectfully request that the Court deny as moot the pending motion for additional depositions [Doc. 325] and cross-motion for an extension of the case schedule [Doc. 334].¹

The Parties request that the following deadlines set in the Court’s Order Granting in Part and Denying in Part American’s Motion to Extend [Doc. 245] and the Court’s Order Granting Joint Motion to Extend Deadlines to Exchange Expert Reports [Doc. 268] be modified as follows:

1. The expert disclosures for each party plaintiff shall be due July 25, 2012.

¹ As indicated to the Court in the Parties’ Joint Motion to Extend Deadlines for Exchange of Expert Reports [Doc. 350] filed last Friday, the Parties engaged in extensive negotiations regarding these Motions and have reached various agreements, which are summarized in this Joint Motion.

2. The expert disclosures for each party defendant shall be due August 27, 2012.
3. All fact discovery shall be completed by September 14, 2012.
4. Rebuttal expert disclosures shall be due September 24, 2012.
5. All pretrial and dispositive motions except motions *in limine* shall be due October 16, 2012.

As part of its agreement to the above schedule, the Parties have also come to other agreements regarding discovery. The Parties have agreed that each side shall each be entitled to take up to 23 fact depositions. In entering into this agreement, each party reserves its rights to (1) move for leave for additional depositions, or (2) move for a protective order with respect to any individual depositions.²

The Parties have also agreed that for any party witness to be deposed in both this case and the Tarrant County case, the deposition in this case shall precede the Tarrant County case deposition if reasonably practicable. Further, for any party witness deposed in the Tarrant County case and this case, the second deposition shall generally be limited to five hours of questioning.³

Finally, Travelport has agreed that it will produce a privilege log for the document production it is making in connection with this Court's Order Granting Plaintiff's Motion to Compel Travelport Defendants [Doc. 337] no later than June 25, 2012. Travelport has also

² This includes the right of any party to move for a protective order to prevent the re-deposition of a witness that was deposed in *American Airlines v. Sabre Inc., et al.*, pending in Tarrant County, Texas (the "Tarrant County case"). By entering into this stipulation, no party is agreeing to permit its witnesses to be re-deposed in this case if previously deposed in the Tarrant County case.

³ The Parties have agreed to several exceptions to the general rule: (a) Defendants' deposition of Cory Garner shall be limited to seven hours of questioning; further, Defendants shall have the right, where warranted in good faith, to request that the second deposition of one additional American witness be subject to the full seven hours of questioning, and American agrees to consider any such request in good faith; and (b) American shall be permitted to take the second deposition of up to one such witness for the full seven hours in this case and shall have the right, where warranted in good faith, to request that the second deposition of one additional party witness be subject to the full seven hours of questioning, and Defendants agree to consider any such request in good faith.

agreed that it will complete its re-review of privileged documents (as discussed in Travelport's June 8, 2012 letter to Judge Cureton) no later than June 29, 2012, and produce the majority of documents and a privilege log associated with that review by June 29, 2012, and produce any the remaining documents and a final privilege log no later than July 6, 2012.

Dated: June 22, 2012

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of June 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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