

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

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

AGREED MOTION TO AMEND PROTECTIVE ORDER

Plaintiff American Airlines, Inc. (“American”) and Defendants Sabre Inc., Sabre Holdings Corporation, and Sabre Travel International Ltd. d/b/a Sabre Travel Network (collectively, “Sabre”), Travelport Ltd. and Travelport, L.P. (collectively, “Travelport”), and Orbitz Worldwide, LLC (“Orbitz,” together with Sabre and Travelport, the “Defendants,” and collectively with Sabre, Travelport, and American, the “Parties”) hereby jointly file this Agreed Motion to Amend the First Amended Stipulated Protective Order (the “Agreed Motion”).¹ The Parties have agreed to and respectfully request that Paragraph 30 of the First Amended Stipulated Protective Order [Dkt. 267] be amended to read as follows:

30. Nothing contained in this Protective Order shall preclude any party from using its own Confidential Information or Outside Attorneys’ Eyes Only Information in any manner it sees fit, without prior consent of any party or the Court. Information that a Receiving Party, or an expert witness retained by a Receiving Party, acquired or acquires through means other than

¹ This Agreed Motion renders moot American’s Combined Emergency Motion to Modify Protective Order, and Motion for Expedited Treatment [Dkt. 363].

through disclosure of Confidential Information or Outside Attorneys' Eyes Only Information by a Supplying Party does not become Confidential Information or Outside Attorneys' Eyes Only Information for the purposes of this Protective Order on the basis that a Supplying Party produces Designated Materials containing the same information. A Receiving Party, or an expert witness retained by a Receiving Party, possessing or acquiring information other than through disclosure by a Supplying Party may use or disclose that information without prior consent of any party or the Court, but may not, under any circumstance, use or disclose Confidential Information, Outside Attorneys' Eyes Only Information, or Designated Materials produced by a Supplying Party except as provided by the terms of this Protective Order. If a Supplying Party knowingly discloses its own Confidential Information or Outside Attorneys' Eyes Only Information in a public or non-redacted pleading filed in the Court's public record or in a publication disseminated to the general public, the Supplying Party shall be deemed thereby to have consented to the removal of that designation with respect to the information disclosed.

Exhibit A to this Agreed Motion contains a full version of the proposed Second Amended Stipulated Protective Order. Exhibit B to this Agreed Motion contains a redline comparison of the First Amended Stipulated Protective Order and the proposed Second Amended Stipulated Protective Order.

Dated July 10, 2012

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of the foregoing document via the Court's CM/ECF system pursuant to the Court's Local Rule 5.1(d) this 10th day of July, 2012.

s/ Yolanda Cornejo Garcia
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