

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 relating to expert discovery and dispositive motions set forth in the Court’s Order Granting Motion to Extend and Denying Certain Motions as Moot [Doc. 359].<sup>1</sup>

On July 25, 2012, Plaintiff served four expert reports containing 293 single-spaced pages of text. Travelport served a 91-page expert report in support of its counterclaims. Accordingly, given the substantial work that needs to be done to respond to the various reports, the Parties have agreed that a 30-day extension of the expert deadlines is necessary.<sup>2</sup> An extension would

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<sup>1</sup> The Parties do not, however, request an extension for the deadline for the completion of fact discovery, which is September 14, 2012.

<sup>2</sup> As part of this agreement, the Parties have also agreed that American may have a two-week extension to respond to Travelport’s Second Set of Interrogatories, which were served on July 3, 2012. American’s responses to those Interrogatories shall now be due August 20, 2012.

make expert disclosures for each party defendant due on September 26, 2012. Rebuttal expert disclosures would be due on October 24, 2012.

The parties also request a corresponding 30-day extension in the deadline for pretrial and dispositive motions, so that these will continue to be due after the conclusion of expert discovery. Accordingly, the Parties respectfully request that the Court extend the deadline for all pretrial and dispositive motions, except for motions *in limine*, to November 15, 2012.

Dated: August 8, 2012

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 8th day of August 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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