EXHIBIT C

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

AMERICAN AIRLINES, INC.,

Plaintiff,

٧.

TRAVELPORT LIMITED, et al.,

Defendant.

CASE NO. 4:11-cy-00244-Y

DECLARATION OF EUGENIO LOBO

I, Eugenio Lobo, declare as follows:

- I. I am over 18 years of age, of sound mind, am fully qualified to testify in this matter, am capable of making this declaration, and I have personal knowledge of the facts stated herein.
- 2. I serve in the position of Account Operations Manager for HP Enterprise Services, LLC ("HPES") and have served in that position since February 2002. As part of my job responsibilities, I have gained familiarity with the HPES product offerings to the airline industry, specifically including its Shares and Atraxis products, as well as the Jetstream project for American Airlines that was terminated by mutual agreement.
- 3. The Shares and Atraxis product offerings are within the market of computerized reservation systems (CRS) utilized by airlines around the world. These systems enable airlines to interface with customers and others who wish to review fares offered by the airlines, make reservations, select seats, etc. CRS systems are utilized by individual airlines for their customers and are distinct from Global Distribution Systems (GDS), which offer information regarding, and the ability to access, multiple airlines, hotels and other vendors.

- 4. In addition to its GDS offerings, Travelport also is a direct competitor of HPES in the CRS market. Travelport previously operated the CRS program for United Airlines, which after its merger with Continental Airlines became a customer of HPES. Delta Airlines is currently a Travelport CRS customer.
- 5. The Jetstream project as to which Travelport has sought extensive discovery involved the development of an enhanced CRS system for use by American Airlines. The proposed product offering incorporated substantial parts of the Shares product currently provided by HPES. Consequently, providing Travelport with access to detailed information regarding the development and features of the Jetstream product would be providing a direct competitor with highly sensitive and proprietary information of HPES.
- 6. The interworkings of the HPES CRS products are extremely confidential and competitively valuable to HPES. HPES maintains this information in its data centers in a secure environment and generally does not provide users, such as its airline customers, with the underlying code that comprises its CRS products or with detailed information regarding the development of the features contained within its products. Only occasionally are very limited portions of those products provided to an airline customer in order for HPES and the customer to jointly work on developing enhancements to the specific product offering utilized by that airline. In the limited circumstances in which that occurs, confidentiality agreements are required by HPES.
- 7. The CRS product offerings of HPES have different features and benefits than do the product offerings of Travelport. It would be extremely prejudicial to HPES if Travelport were given access to information regarding the operations of the features and benefits of the

HPES product offerings that make them unique, of the development process pertaining to those features, or to like features being developed as part of the Jetstream project.

I declare under penalty of perjury and under the laws of the United States of
America that the foregoing is true and correct.

EXECUTED this 5 7 day of SEPTEMBER , 2012.

EUGENIO MOBO