

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

AMERICAN AIRLINES, INC.,

Plaintiff,

v.

TRAVELPORT LIMITED, et al.,

Defendant.

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

**JOINT MOTION TO EXTEND TIME FOR FILING OF
HEWLETT PACKARD COMPANY’S MOTION FOR PROTECTIVE ORDER**

TO THE HONORABLE TERRY R. MEANS,
UNITED STATES DISTRICT JUDGE

Hewlett Packard Company (“HP”) and Travelport Limited and Travelport, LP (collectively “Travelport”) file this Joint Motion to Extend Time for Filing of Hewlett Packard Company’s Motion for Protective Order, stating as follows:

1. On or about August 10, 2012, Travelport served HP with a subpoena duces tecum seeking the production of documents in this cause. On September 5, 2012, HP filed a Motion for Protective Order (docket 406) seeking protection from various aspects of the subpoena, including but not limited to an order providing that certain items not be produced because of their trade secret nature.

2. On October 11, 2012, this Court entered its Order granting Motion for Protective Order (docket 411), which, among other relief, postponed consideration of the merits of much of HP’s motion pending a scheduled mediation among parties to this cause. The Order further directed Travelport and HP to confer between December 22 and January 4, 2013 in an attempt to find a resolution of HP’s objections as to its proprietary information regarding the Jetstream

project. In accordance with the Court's Order, the parties did confer on January 4, 2013, and have had subsequent communications regarding HP's objections. The parties have been seeking to reach agreement on the scope of a production that would provide Travelport with the information needed without unduly infringing upon HP's claimed trade secret rights. The parties believe that the potential to reach an agreement about the scope of the production would benefit from an additional week within which to conduct these negotiations, and they accordingly have filed this joint motion seeking such relief.

WHEREFORE, HP and Travelport jointly request that this Court enter an order extending until January 25, 2013 the deadline for HP to file another motion for protective order regarding the subpoena in order to give the parties an opportunity to negotiate further to either resolve this issue completely or further narrow the issues to be presented to the Court.

Respectfully submitted,

/s/ Tim Gavin

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CERTIFICATE OF SERVICE

I hereby certify that on January 18, 2013, I caused a true and correct copy of Joint Motion to Extend Time for Filing of Hewlett Packard Company's Motion for Protective Order to be served via the electronic filing system, upon each of the following:

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