

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

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

JOINT MOTION TO EXTEND DEADLINES

Plaintiff American Airlines, Inc. (“American”), and Defendants Travelport Limited, Travelport, LP, and Orbitz Worldwide, LLC (collectively “Defendants,” and together with American “the Parties”), through their undersigned counsel, jointly move for an extension of certain case deadlines.

In particular, the Parties request that certain deadlines set in the Court’s Order Granting Unopposed Motion to Stay Party Discovery and Extend Current Deadlines and Request for Expedited Treatment [Doc. 420] be modified as follows:

- a) Fact discovery shall be completed by Wednesday, **March 27, 2013**.
- b) Defendants’ expert reports shall be due Tuesday, **April 9, 2013**.
- c) Plaintiff’s rebuttal expert disclosures shall be due Tuesday, **April 30, 2013**.
- d) Expert depositions shall be completed by Friday, **May 17, 2013**.
- e) All pretrial and dispositive motions, except motions *in limine*, shall be due Friday, **May 31, 2013**.

The requested extension is necessary because of recent developments in the case. For example, certain depositions of key witnesses have not been able to be scheduled until March.

Further, as the Court is aware, Orbitz shut down work by its experts during the various litigation stays (Dkts. 407, 420, 431 and 445).

For the foregoing reasons, the parties jointly request the extension described above to accommodate these recent developments. A proposed form of order is attached.

Dated: February 20, 2013

Respectfully submitted,

/s/ Yolanda C. Garcia

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CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of February, 2013, 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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