

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.	)	(ODD DOCKET LAW CLERK)
	)	
TRAVELPORT LIMITED, et al.,	)	
	)	
Defendants.	)	
	)	

**UNOPPOSED MOTION TO EXTEND PLAINTIFF’S TIME TO RESPOND TO  
 DEFENDANTS’ MOTION FOR RECONSIDERATION AND LEAVE TO FILE AN  
ADDITIONAL COUNTERCLAIM**

Plaintiff American Airlines, Inc. (“American”) files this unopposed motion to briefly extend its deadline to respond to Defendants Travelport Limited and Travelport, LP (collectively, “Travelport”) Motion for Reconsideration and Leave to File an Additional Counterclaim (the “Motion”) (Dkt. 433) from February 26, 2013 until March 8, 2013. Travelport does not oppose the requested relief.

American seeks this brief extension because Travelport has moved the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”) in the case of *In re AMR Corp., et al.*, Case No. 11-15463(SHL), to modify the automatic stay to allow Travelport to amend its counterclaims against American in this action. The Bankruptcy Court is hearing argument on this motion on February 26, 2013, the same day as American’s current deadline to respond to the Motion. If the Bankruptcy Court denies Travelport’s motion to lift the stay, it could obviate the need for the parties to brief or the Court to consider some of the issues

raised in Travelport's Motion. Accordingly, American requests that Court extend American's deadline to respond to Travelport's Motion from February 26, 2013 until March 8, 2013.

Dated: February 25, 2013

Respectfully submitted,

/s/ Yolanda C. Garcia

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**CERTIFICATE OF CONFERENCE**

Pursuant to Local Rule 7.1(h), undersigned counsel for American certifies that counsel for Travelport has been consulted and does not oppose the relief sought in this motion.

/s/ Yolanda C. Garcia  
\_\_\_\_\_  
Yolanda C. Garcia

**CERTIFICATE OF SERVICE**

I hereby certify that on February 25, 2013, a true and correct copy of the foregoing was filed with the Clerk of this Court using the CM/ECF system, which will serve a notice of filing upon the filing users.

/s/ Robert Velevis  
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Robert Velevis