

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

AMERICAN AIRLINES, INC.	§	
	§	
Plaintiff,	§	
v.	§	CIVIL ACTION NO. 4:11-CV-244-Y
	§	
TRAVELPORT LIMITED, et al.	§	
	§	
Defendants.	§	

**AMERICAN AIRLINES INC.'S, TRAVELPORT LTD. AND
TRAVELPORT, L.P.'S JOINT MOTION FOR LIMITED STAY OF THE CASE
PENDING CONDITIONS OF SETTLEMENT**

Plaintiff American Airlines, Inc. (“American”) and Defendants Travelport Ltd. and Travelport, L.P. (collectively, “Travelport”) hereby file this Joint Motion for Limited Stay of the Case Pending Conditions of Settlement (the “Joint Motion”). American and Travelport have entered into a Settlement Agreement dated as of March 12, 2013 (the “Settlement Agreement”). This Settlement Agreement will have the effect of resolving all claims asserted between Travelport and American in this action, subject to the occurrence of certain events, including (i) the approval of the Settlement Agreement by the United States Bankruptcy Court for the Southern District of New York in which American, along with its affiliated debtors, have filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code, as amended, and (ii) the expiration of approximately ninety (90) days, so long as Travelport does not file for bankruptcy, or in the event it does, assumes the Settlement Agreement and certain other agreements.

American’s claims against Orbitz Worldwide, LLC remain unaffected by the Settlement Agreement with Travelport.

American and Travelport respectfully request that this case be stayed as to American's claims against Travelport and Travelport's claims against American pending the conditions as provided in the Settlement Agreement. American and Travelport further respectfully request any such additional relief to which they are entitled.

Dated March 13, 2013

Respectfully submitted,

/s/ Yolanda Cornejo Garcia

Yolanda Cornejo Garcia
State Bar No. 24012457
Michelle Hartmann
State Bar No. 24032401
WEIL, GOTSHAL & MANGES LLP
200 Crescent Court, Suite 300
Dallas, TX 75201-6950
214.746.7700
214.746.7777 (Fax)

Bill Bogle
State Bar No. 02561000
Roland K. Johnson
State Bar No. 00000084
HARRIS, FINLEY & BOGLE, P.C.
777 Main Street, Suite 3600
Fort Worth, TX 76102
817.870.8700
817.332.6121 (Fax)

R. Paul Yetter
State Bar No. 22154200
Anna Rotman
State Bar No. 24046761
YETTER COLEMAN LLP
909 Fannin, Suite 3600
Houston, TX 77010
713.632.8000
713.632.8002 (Fax)

Of Counsel:
WEIL, GOTSHAL & MANGES LLP
Richard A. Rothman
James W. Quinn
767 Fifth Avenue
New York, NY 10153
212.310.8426
212.310-8285 (Fax)

DEWEY & LEBOEUF LLP
M.J. Moltenbrey
1101 New York Ave. NW
Washington, D.C. 20005
202.346.8738
202.346.8102 (Fax)

/s/ Michael L. Weiner

Michael L. Weiner
michael.weiner@dechert.com

DECHERT LLP

1095 Avenue of the Americas
New York, New York 10036-6797
212.698.3608
212.698.3599 (Fax)

Mike Cowie
mike.cowie@dechert.com

Craig G. Falls
craig.falls@dechert.com

DECHERT LLP

1775 I Street, NW
Washington, D.C. 20006-2401
202.261.3300
202.261.3333 (Fax)

Carolyn H. Feeney
carolyn.feeney@dechert.com

Justin N. Pentz
justin.pentz@dechert.com

DECHERT LLP

2929 Arch Street
Philadelphia, PA 19104
215.994.4000
215.994.2222 (Fax)

Faith E. Gay
faithgay@quinnemanuel.com

Steig D. Olson
steigolson@quinnemanuel.com

**QUINN EMANUEL URQUHART &
SULLIVAN, LLP**

51 Madison Avenue, 22nd Floor
New York, New York 10010
212.849.7000
212.849.7100 (Fax)

Walker C. Friedman
State Bar No. 07472500
wcf@fsclaw.com

Christian D. Tucker
State Bar No. 00795690

tucker@fsclaw.com

FRIEDMAN, SUDER & COOKE, P.C.

Tindall Square Warehouse No. 1
604 East 4th Street, Suite 200
Fort Worth, Texas 76102
817.334.0400
817.334.0401 (Fax)

John T. Schriver
JTSchriver@duanemorris.com
Paul E. Chronis
pechronis@duanemorris.com
DUANE MORRIS LLP
190 South LaSalle Street, Suite 3700
Chicago, Illinois 60603-3433
312.499.6700
312.499.6701 (Fax)

*Attorneys for Defendants
Travelport Limited and Travelport, LP*

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of the foregoing document via the Court's CM/ECF system pursuant to the Court's Local Rule 5.1(d) this 13th day of March, 2013.

s/ Yolanda Cornejo Garcia

Yolanda Cornejo Garcia

CERTIFICATE OF CONFERENCE

On March 13, 2013, I spoke with counsel for Orbitz Worldwide, LCC, who indicated that it does not oppose the relief sought herein.

s/ Michael L. Weiner

Michael L. Weiner