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

AMERICAN AIRLINES, INC.,)
Plaintiff,))
TRAVELPORT LIMITED, a foreign corporation, and TRAVELPORT, LP, a Delaware limited partnership, d/b/a TRAVELPORT;) Civil Action No. 4:11-cv-00244-Y)
And)
ORBITZ WORLDWIDE, LLC, a Delaware limited liability company, d/b/a ORBITZ,))))
Defendants.)

MEMORANDUM IN SUPPORT OF TRAVELPORT LIMITED AND TRAVELPORT, LP'S MOTION TO STAY DISCOVERY UNTIL DISPOSITIVE MOTIONS ARE DECIDED

Defendants Travelport Limited and Travelport, LP (collectively "Travelport") seek a stay of discovery for the same reasons they oppose Plaintiff's motion for a Rule 16(a) conference. Accordingly, the grounds for this motion are fully discussed in the brief Travelport filed in opposition to Plaintiff's motion.¹ Travelport incorporates by reference the arguments in that opposition brief in support of this motion to stay discovery.

Dated: June 1, 2011

Respectfully submitted,

/s/ Michael L. Weiner

Michael L. Weiner

michael.weiner@dechert.com

DECHERT LLP

¹ Travelport's Opposition to Request for Rule 16 Conference and Memorandum in Support of Motion to Stay Discovery Pending a Decision on the Rule 12(b)(6) and Rule 12(b)(3) Motions. (Docket # 47).

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 Falls craig.falls@dechert.com

DECHERT LLP

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

ATTORNEYS FOR DEFENDANTS TRAVELPORT LIMITED and TRAVELPORT, LP

Of Counsel to Travelport Defendants:

/s/ Walker C. Friedman

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** Suite 3700 190 South LaSalle Street

Chicago, Illinois 60603-3433 312.499.6700 312.499.6701 (Fax)

CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of June, 2011, 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/ Walker C. Friedman

Walker C. Friedman