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

AMERICAN AIRLINES, INC., a Delaware corporation,	\$ \$ \$
Plaintiff,	\$ \$
VS.	Ş
SABRE, INC., a Delaware corporation; SABRE HOLDINGS CORPORATION, a Delaware corporation and SABRE TRAVEL INTERNATIONAL LTD., a foreign corporation, d/b/a SABRE TRAVEL NETWORK	§ § § § Civil Action No. 4:11-cv-00244-Y §
TRAVELPORT LIMITED, a foreign corporation, and TRAVELPORT, LP, a Delaware limited partnership, d/b/a TRAVELPORT;	\$ \$ \$ \$ \$
and	§
ORBITZ WORLDWIDE, LLC, a Delaware limited liability company, d/b/a ORBITZ,	\$ \$ \$
Defendants.	\$ \$

JOINDER BY DEFENDANT ORBITZ WORLDWIDE, LLC TO TRAVELPORT'S MOTION TO STAY DISCOVERY PENDING A DECISION ON TRAVELPORT'S RULE 12(b)(6) MOTION TO DISMISS, AND ORBITZ'S MOTION TO STAY DISCOVERY PENDING RESOLUTION OF ITS SEPARATE RULE 12(b)(6) MOTION <u>TO DISMISS PLAINTIFF'S FIRST AMENDED COMPLAINT</u>

Defendant Orbitz Worldwide, LLC ("Orbitz") hereby joins defendants Travelport Limited and Travelport, LP's (collectively, "Travelport") Motion to Stay Discovery Pending a Decision on Travelport's Rule 12(b)(6) Motion to Dismiss Plaintiff's First Amended Complaint (Docket No. 88). Orbitz also respectfully moves this Court to stay discovery pursuant to Federal Rule of Civil Procedure 26(c) until the Court rules on Orbitz's separate Motion to Dismiss Plaintiff American Airline's First Amended Complaint (Docket No. 77).

For the reasons set forth in Travelport's Motion to Stay, and Memorandum in Support thereof, a stay of discovery pending resolution of Orbitz's Rule 12(b)(6) motion to dismiss is also warranted. In further support of its motion, Orbitz states that, during the parties' Rule 26(f) conference today, American's counsel acknowledged that it would not be seeking any type of preliminary injunction against Orbitz. Accordingly, Orbitz respectfully submits that there is no need to engage in what will undoubtedly be expensive discovery until the Court has ruled on whether American's claims against Orbitz may proceed.

In order to avoid burdening the Court with repetitive argument, Orbitz hereby adopts in full the arguments and authorities in Travelport's Memorandum in Support of its Motion to Stay (Docket No. 89).

DATED: July 5, 2011

Respectfully submitted,

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CERTIFICATE OF SERVICE

On July 5, 2011, I electronically submitted 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/Christopher S. Yates Christopher S. Yates

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