

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF KANSAS**

UNITED STATES OF AMERICA, )  
)

*Plaintiff,* )

v. )

AMR CORPORATION, )  
AMERICAN AIRLINES, INC., and )  
AMR EAGLE HOLDING )  
CORPORATION, )

*Defendants.* )  
\_\_\_\_\_ )

Civil Action No.:99-1180-JTM

**NOTICE OF DEPOSITION PURSUANT TO  
FED.R.CIV.P. 30(B)(6)**

TO: Sabre, Inc.  
4255 Amon Carter Boulevard  
Fort Worth, TX 76155

Helene Jaffe  
Weil Gotshal & Manges L.L.P.  
767 Fifth Avenue  
New York, New York 10153  
(counsel for the Defendants)

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 30(b)(6) and 45 and LR 30.1, plaintiff will take the deposition(s) upon oral examination, to be recorded by stenographic means and videotape, at the offices of the Antitrust Division of the Department of Justice, Thanksgiving Tower, 1601 Elm Street, Suite 4950, Dallas, Texas

75201, of Sabre, Inc. (“Sabre”). The deposition(s) will commence at 9:00 a.m. on August 31, 2000. If necessary, each deposition will be adjourned until completed.

Sabre is requested to designate one or more 30(b)(6) witnesses who is(are) knowledgeable and prepared to testify fully on behalf of Sabre regarding the following topics:

1. The following documents as provided in Attachment A: “Decision Analysis Preliminary Results”, labeled AALIT12200597 to AALIT12200607; “Integrating AA Planning: Pricing, Yield Management, Capacity Planning Report to Steering Committee”, labeled AALIT02200125 to AALIT02200139; “AA Planning in a Competitive Environment: Integrating Pricing, Yield Management, and Capacity Planning Final Presentation”, labeled AALIT02200041 to AALIT02200092; “A Vision of AA Strategy Development and Evaluation”, labeled AALIT02200140 to AALIT02200148; “Proposal for Price Balance Statistic: First Step to Pricing Optimization”, labeled AALIT22000110 to AALIT22000114; “AA Planning in a Competitive Environment: Integrating Pricing, Yield Management, and Capacity Planning”, labeled AALIT22000234 to AALIT22000253; “Integrated Planning Model”, labeled AALIT22000280 to AALIT22000304, including:

- i. the date of the creation of each document;
- ii. the circumstances surrounding the creation of each document, including:
  - (1) who created the document;

- (2) the reason(s) why the document was created;
- (3) any input or collaboration or work that any employees of AMR Corporation, American Airlines, Inc., and/or AMR Eagle Holding Corporation (“American”) had in the creation of the document;
- iii. the use of each document;
- iv. the extent of distribution of each document to employees of Sabre, to employees of American, and/or to third parties.

2. Whether each document listed in (1) and the document(s) produced in response to Attachment B hereto constitutes a business record of Sabre, as that term is used in Fed. R. Evid. 803(6), including:

- i. whether it is Sabre’s regular practice to prepare documents and records for use in its business;
- ii. whether it is Sabre’s regular practice to prepare documents and records at or near the date of the date(s) indicated on them;
- iii. whether it is Sabre’s regular practice to retain and maintain records in the ordinary course of Sabre’s business; and
- iv. whether these documents came from Sabre’s business files.

3. The authenticity of each document listed in (1) and the authenticity of the

documents requested to be produced in Attachment B hereto.

Dated: August 21, 2000

Respectfully submitted

COUNSEL FOR  
PLAINTIFF UNITED STATES

“/s/”

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By Renata B. Hesse  
Department of Justice, Antitrust Division  
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Washington, D.C. 20530  
Tel: (202) 616-0944  
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## **Attachment A**

- (1) “Decision Analysis Preliminary Results”, labeled AALIT12200597 to AALIT12200607;
- (2) “Integrating AA Planning: Pricing, Yield Management, Capacity Planning Report to Steering Committee”, labeled AALIT02200125 to AALIT02200139;
- (3) “AA Planning in a Competitive Environment: Integrating Pricing, Yield Management, and Capacity Planning Final Presentation”, labeled AALIT02200041 to AALIT02200092;
- (4) “A Vision of AA Strategy Development and Evaluation”, labeled AALIT02200140 to AALIT02200148;
- (5) “Proposal for Price Balance Statistic: First Step to Pricing Optimization”, labeled AALIT22000110 to AALIT22000114;
- (6) “AA Planning in a Competitive Environment: Integrating Pricing, Yield Management, and Capacity Planning”, labeled AALIT22000234 to AALIT22000253;
- (7) “Integrated Planning Model”, labeled AALIT22000280 to AALIT22000304