

**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

AMENDED NOTICE OF DEPOSITION
PURSUANT TO FED. R. CIV. P. 30(b)(6)
(DFW-ICT)

TO: CLERK OF THE COURT

COUNSEL FOR DEFENDANTS
Helene Jaffe
Weil Gotshal & Manges L.L.P.
767 Fifth Avenue
New York, New York 10153

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 30(b)(6) and 45 and LR 30.1, plaintiff will take the depositions 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 American Airlines, Inc. and AMR Eagle Holding Corporation (collectively

“American”). American is requested to designate the person or persons most knowledgeable and prepared to testify on behalf of American concerning the subject matter described on Attachment A hereto. The deposition(s) will commence at 9:00 a.m. on August 31, 2000. If necessary, each deposition will be adjourned until completed.

Dated: August 27, 2000

Respectfully submitted

COUNSEL FOR

PLAINTIFF UNITED STATES

“/s/”

By Renata B. Hesse
Department of Justice, Antitrust Division
325 7th Street, N.W. Suite 500
Washington, D.C. 20530
Tel: (202) 307-6350
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Attachment A

(1) American's analysis and decisions relating to its removal of jet service on DFW-ICT from January 1, 1993 to the present, including: (a) the financial performance of Wichita jet service prior to the removal of jets; (b) the process that led to the removal of jet service; (c) any analysis that was conducted in connection with the decision to remove jet service, including all quantitative analyses and internal measurements that were performed and/or utilized; (d) the names of the person(s) involved in the decision to remove jet service; and (e) the bases for American's statements to the press and to Congress that American was losing money on its DFW-ICT jet service.

(2) American's analysis and decisions relating to the reintroduction or proposed reintroduction of jet service on DFW-ICT under a minimum revenue guarantee, including: (a) the evolution of American's minimum revenue guarantee proposal; (b) the \$13,500 figure contained in American's minimum revenue guarantee proposal (including the basis for it, the person(s) involved in selecting and approving it, and what the figure represented in terms of American's profitability and costs in connection with DFW-ICT jet service); (c) "American's actual costs" as listed in paragraph 4 of the minimum revenue guarantee proposal, including "start-up expenditures," "installation of data processing equipment," "depreciation on all ground equipment," and "training"; (d) American's form minimum revenue guarantee proposal and what it is based upon; (e) the process that would have ensued had Wichita wanted to proceed with negotiating a minimum revenue guarantee; and (f) American's understanding of Wichita's response to American's proposed minimum revenue guarantee.