

1 Jason C. Murray (CA Bar No. 169806)
 Robert B. McNary (CA Bar No. 253745)
 2 CROWELL & MORING LLP
 515 South Flower St., 40th Floor
 3 Los Angeles, CA 90071
 Telephone: 213-443-5582
 4 Facsimile: 213-622-2690
 Email: jmurray@crowell.com
 5 rmcnary@crowell.com

6 Jerome A. Murphy (*pro hac vice*)
 Matthew J. McBurney (*pro hac vice*)
 7 Astor H.L. Heaven (*pro hac vice*)
 CROWELL & MORING LLP
 8 1001 Pennsylvania Avenue, N.W.
 Washington, D.C. 20004
 9 Telephone: 202-624-2500
 Facsimile: 202-628-5116
 10 Email: jmurphy@crowell.com
 mmcurney@crowell.com
 11 aheaven@crowell.com

12 *Attorneys for Plaintiff Target Corporation*

13
 14 **UNITED STATES DISTRICT COURT**
NORTHERN DISTRICT OF CALIFORNIA
 15 **SAN FRANCISCO DIVISION**

16
 17 IN RE: CATHODE RAY TUBE (CRT)
 ANTITRUST LITIGATION

18
 19 This Document Relates to:
 20
 21 *Target Corp. v. Chunghwa Picture Tubes,*
Ltd., et al., Case No. 3:11-cv-05514-SC
 22
 23 *Target Corp., et al. v. Technicolor SA, et*
al., Case No. 3:13-cv-05686-SC

Master File No. 3:07-cv-05944-SC

MDL No. 1917

STIPULATION AND ~~PROPOSED~~
ORDER DISMISSING WITH PREJUDICE
PLAINTIFF'S CLAIMS UNDER STATE
LAW

Judge: Hon. Samuel Conti

1 Pursuant to Rule 41(a)(1) of the Federal Rules of Civil Procedure, plaintiff Target
2 Corporation (“Plaintiff”), and defendants Chunghwa Picture Tubes, Ltd., Chunghwa Picture
3 Tubes (Malaysia), Irico Group Corporation, Irico Group Electronics Co., Ltd., Irico Display
4 Devices Co., Ltd., LG Electronics, Inc., LG Electronics USA, Inc., LP Displays International
5 Ltd., Hitachi, Ltd., Hitachi Displays, Ltd., Hitachi America, Ltd., Hitachi Asia, Ltd., Hitachi
6 Electronic Devices (USA), Inc., Panasonic Corporation, Panasonic Corporation of North
7 America, MT Picture Display Co., Ltd., Beijing Matsushita Color CRT Co., Ltd., Koninklijke
8 Philips Electronics N.V., Philips Electronics North America Corporation, Philips Electronics
9 Industries (Taiwan), Ltd., Philips da Amazonia Industria Electronica Ltda., Samsung SDI Co.,
10 Ltd., Samsung SDI America, Inc., Samsung SDI Mexico S.A. de C.V., Samsung SDI Brasil
11 Ltda., Shenzhen Samsung SDI Co., Ltd., Tianjin Samsung SDI Co., Ltd., Samsung SDI
12 (Malaysia) Sdn. Bhd., Samtel Color Ltd., Thai CRT Co., Ltd., Toshiba Corporation, Toshiba
13 America, Inc., Toshiba America Consumer Products, LLC, Toshiba America Electronic
14 Components, Inc., Toshiba America Information Systems, Inc., Technicolor SA (f/k/a Thomson
15 SA); Technicolor USA, Inc. (f/k/a Thomson Consumer Electronics, Inc.), Videocon Industries,
16 Ltd., Technologies Displays Americas LLC (f/k/a Thomson Displays Americas LLC),
17 Mitsubishi Electric Corporation, Mitsubishi Electric Visual Solutions America, Inc., and
18 Mitsubishi Electric & Electronics USA, Inc., being all the defendants in this case (collectively,
19 “Defendants”) state as follow:

20 On October 3, 2013, Target Corporation filed its Second Amended Complaint (“SAC”) in
21 individual case number 3:11-cv-05514-SC (MDL Master Dkt. No. 1981). On December 9, 2013,
22 Target filed its Complaint in individual case number 3:13-cv-05686-SC (Ind. Case Dkt. No. 1)
23 (the “Thomson/Mitsubishi/TDA Complaint”). The SAC and the Thomson/Mitsubishi/TDA
24 Complaint are the “Complaints.” In the Complaints, Target asserts claims for relief against
25 Defendants under the Sherman Act, the California Cartwright Act, California’s Unfair
26 Competition Law, California Business and Professional Code §17200, *et seq.*, Arizona Revised
27 Stat. § 44-1401, *et seq.*, Florida Stat. §501.201, *et seq.*, Illinois Antitrust Act, 740 Illinois Code

1 10/1, *et seq.*, Iowa Code §§ 553.1, *et. seq.*, Kansas Stat. Ann. §§ 50-101, *et. seq.*, Michigan
2 Comp. Laws Ann. §§ 445.771, *et seq.*, Minnesota Stat. §§ 325D.50, *et seq.*, New York General
3 Business Law §§ 340, *et seq.*, North Carolina Gen. Stat. §§ 75-1, *et seq.*, and Wisconsin Stat. §§
4 133.01, *et seq.*

5 Plaintiff now desires to dismiss with prejudice its claims against Defendants under the
6 California Cartwright Act, California's Unfair Competition Law, California Business and
7 Professional Code §17200, *et seq.*, Arizona Revised Stat. § 44-1401, *et seq.*, Florida Stat.
8 §501.201, *et seq.*, Illinois Antitrust Act, 740 Illinois Code 10/1, *et seq.*, Iowa Code §§ 553.1, *et.*
9 *seq.*, Kansas Stat. Ann. §§ 50-101, *et. seq.*, Michigan Comp. Laws Ann. §§ 445.771, *et seq.*,
10 Minnesota Stat. §§ 325D.50, *et seq.*, New York General Business Law §§ 340, *et seq.*, North
11 Carolina Gen. Stat. §§ 75-1, *et seq.*, and Wisconsin Stat. §§ 133.01, *et seq.* Plaintiff is not
12 dismissing, and will continue to prosecute, its claims against Defendants under the Sherman Act.

13 NOW, THEREFORE, THE PARTIES STIPULATE AND AGREE that the claims of
14 Plaintiff asserted against Defendants in these cases under the California Cartwright Act,
15 California's Unfair Competition Law, California Business and Professional Code §17200, *et*
16 *seq.*, Arizona Revised Stat. § 44-1401, *et seq.*, Florida Stat. §501.201, *et seq.*, Illinois Antitrust
17 Act, 740 Illinois Code 10/1, *et seq.*, Iowa Code §§ 553.1, *et. seq.*, Kansas Stat. Ann. §§ 50-101,
18 *et. seq.*, Michigan Comp. Laws Ann. §§ 445.771, *et seq.*, Minnesota Stat. §§ 325D.50, *et seq.*,
19 New York General Business Law §§ 340, *et seq.*, North Carolina Gen. Stat. §§ 75-1, *et seq.*, and
20 Wisconsin Stat. §§ 133.01, *et seq.* are dismissed with prejudice. Both Plaintiff and Defendants
21 agree to bear their own costs and fees with respect to the dismissed claims. This dismissal does
22 not apply to the claims of Plaintiff asserted against Defendants in these cases under the Sherman
23 Act.

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1 Dated: November 5, 2014

/s/ Jason C. Murray

2 Jason C. Murray (CA Bar No. 169806)
3 Robert B. McNary (CA Bar No. 253745)
4 CROWELL & MORING LLP
5 515 South Flower St., 40th Floor
6 Los Angeles, CA 90071
7 Telephone: 213-443-5582
8 Facsimile: 213-622-2690
9 Email: jmurray@crowell.com
10 rmcnary@crowell.com

11 Jerome A. Murphy (*pro hac vice*)
12 Matthew J. McBurney (*pro hac vice*)
13 Astor H.L. Heaven (*pro hac vice*)
14 CROWELL & MORING LLP
15 1001 Pennsylvania Avenue, N.W.
16 Washington, D.C. 20004
17 Telephone: 202-624-2500
18 Facsimile: 202-628-5116
19 Email: jmurphy@crowell.com
20 mmcburney@crowell.com
21 aheaven@crowell.com

22 *Attorney for Plaintiff Target Corporation*

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/s/ Joel Steven Sanders

Joel Steven Sanders
jsanders@gibsondunn.com
Rachel S. Brass
rbrass@gibsondunn.com
Christine A. Fujita
cfujita@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
555 Mission Street
Suite 3000
San Francisco, CA 94105-2933
Tel: 415-393-8200

*Counsel for Defendants Chunghwa Picture
Tubes, Ltd. and Chunghwa Picture Tubes
(Malaysia)*

/s/ Jeffrey L. Kessler

Jeffrey L. Kessler
jkessler@winston.com
A. Paul Victor
pvictor@winston.com
Eva W. Cole
ewcole@winston.com
Molly M. Donovan
mmdonovan@winston.com
WINSTON & STRAWN LLP
200 Park Avenue
New York, NY 10166-4193
Tel: (212) 294-6700

David L. Yohai
david.yohai@weil.com
Steven A. Reiss
steven.reiss@weil.com
Adam C. Hemlock
adam.hemlock@weil.com
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, NY 10153
Tel: (212) 310-8000

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Counsel for Defendants Panasonic Corporation, Panasonic Corporation of North America, and MT Picture Display Co., Ltd.

/s/ Hojoon Hwang

Hojoon Hwang
hojoon.hwang@mto.com
MUNGER, TOLLES & OLSON LLP
560 Mission Street, 27th Floor
San Francisco, CA 94105
Tel: (415) 512-4000

William D. Temko
william.temko@mto.com
Jonathan E. Altman
jonathan.altman@mto.com
Bethany W. Kristovich
bethany.kristovich@mto.com
MUNGER TOLLES & OLSON LLP
355 South Grand Avenue, 35th Floor
Los Angeles, CA 90071-1560
Tel. (213) 683-9100

Counsel for Defendants LG Electronics, Inc. and LG Electronics USA, Inc.

/s/ Mark C. Dosker

Mark C. Dosker
mark.dosker@squiresanders.com
Nathan Lane, III
nathan.lane@squiresanders.com
SQUIRE SANDERS LLP
275 Battery Street, Suite 2600
San Francisco, CA 94111
Tel: (415) 954-0200

Counsel for Defendant Technologies Displays Americas LLC and Videocon Industries, Ltd.

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27
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/s/ John Taladay

John Taladay
john.taladay@bakerbotts.com
Joseph Ostoyich
joseph.ostoyich@bakerbotts.com
Charles M. Malaise
Charles.malaise@bakerbotts.com
Erik T. Koons
erik.koons@bakerbotts.com
BAKER BOTTS LLP
The Warner
1299 Pennsylvania Avenue, NW
Washington, DC 20004-2400
Tel: (202) 639-7909

Jon V. Swenson
jon.swenson@bakerbotts.com
BAKER BOTTS LLP
1001 Page Mill Road
Building One, Suite 200
Palo Alto, CA 94304
Tel. (650) 739-7500

*Counsel for Defendants Koninklijke Philips
Electronics N.V., Philips Electronics North
America Corporation, Philips Electronics
Industries (Taiwan), Ltd., and Philips da
Amazonia Industria Electronica Ltda.*

/s/ Richard Snyder

Christine Laciak
christine.laciak@freshfields.com
Richard Snyder
richard.snyder@freshfields.com
Craig D. Minerva
craig.minerva@freshfields.com
Bruce C. McCulloch
bruce.mcculloch@freshfields.com
Terry Calvani
terry.calvani@freshfields.com
FRESHFIELDS BRUCKHAUS &
DERINGER US, LLP
700 13th Street, NW, 10th Floor

1 Washington, DC 20005-3960
2 Tel: (202) 777-4500

3 *Counsel for Defendant Beijing*
4 *Matsushita Color CRT Co., Ltd.*

5 /s/ Lucius B. Lau

6 Christopher M. Curran
7 ccurran@whitecase.com
8 Lucius B. Lau
9 alau@whitecase.com
10 Dana E. Foster
11 defoster@whitecase.com
12 WHITE & CASE, LLP
13 701 13th Street, NW
14 Washington, DC 20005
15 Tel: (202) 626-3600

16 *Counsel for Defendants Toshiba*
17 *Corporation, Toshiba America, Inc.,*
18 *Toshiba America Information Systems, Inc.,*
19 *Toshiba America Consumer Products,*
20 *L.L.C., and Toshiba America Electronic*
21 *Components, Inc.*

22 /s/ Eliot A. Adelson

23 Eliot A. Adelson
24 eadelson@kirkland.com
25 James Maxwell Cooper
26 max.cooper@kirkland.com
27 KIRKLAND & ELLIS LLP
28 555 California Street, 27th Floor
San Francisco, CA 94104
Telephone: (415) 439-1400
Facsimile: (415) 439-1500

James H. Mutchnik
jmutchnik@kirkland.com
Kate Wheaton
kate.wheaton@kirkland.com
KIRKLAND & ELLIS LLP
300 North LaSalle
Chicago, Illinois 60654

1 Telephone: (312) 862-2000
2 Facsimile: (312) 862-2200
3 *Counsel for Defendants Hitachi, Ltd.,*
4 *Hitachi Displays, Ltd., Hitachi Asia, Ltd.,*
5 *Hitachi America, Ltd., and Hitachi*
6 *Electronic Devices (USA), Inc.,*

7 */s/ James L. McGinnis*

8 Gary L. Halling
9 ghalling@sheppardmullin.com
10 James L. McGinnis
11 jmcginnis@sheppardmullin.com
12 Michael Scarborough
13 mscarborough@sheppardmullin.com
14 SHEPPARD MULLIN RICHTER &
15 HAMPTON LLP
16 Four Embarcadero Center, 17th Floor
17 San Francisco, CA 94111
18 Tel: (415) 434-9100

19 *Counsel for Defendants Samsung SDI*
20 *America, Inc., Samsung SDI Co., Ltd.,*
21 *Samsung SDI Mexico S.A. de C.V., Samsung*
22 *SDI Brasil Ltda., Shenzhen Samsung SDI*
23 *Co., Ltd., Tianjin Samsung SDI Co., Ltd.,*
24 *and Samsung SDI (Malaysia) Sdn. Bhd.*

25 */s/ Terrence J. Truax*

26 Brent Caslin
27 bcaslin@jenner.com
28 JENNER & BLOCK LLP
633 West 5th Street, Suite 3600
Los Angeles, CA 90071-2054
Tel: (213) 239-5100

Terrence J. Truax
ttruax@jenner.com
Michael T. Brody
mbrody@jenner.com
Shaun M. Van Horn
svanhorn@jenner.com
Gabriel A. Fuentes
gfuentes@jenner.com
Molly M. Powers

1 mpowers@jenner.com
2 JENNER & BLOCK LLP
3 353 North Clark Street
4 Chicago, IL 60654
5 Tel: (312) 222-9350

6 *Counsel for Mitsubishi Electric*
7 *Corporation, Mitsubishi Electric &*
8 *Electronics USA, Inc. and Mitsubishi*
9 *Electric Visual Solutions America,*
10 *Inc.*

11 */s/ Kathy Osborn*

12 Calvin L. Litsey
13 calvin.litsey@faegrebd.com
14 FAEGRE BAKER DANIELS LLP
15 1950 University Avenue, Suite 450
16 East Palo Alto, CA 94303-2279
17 Tel: (650) 324-6700

18 Kathy Osborn
19 kathy.osborn@faegrebd.com
20 Ryan M. Hurley
21 ryan.hurley@faegrebd.com
22 FAEGRE BAKER DANIELS LLP
23 300 N. Meridian Street, Suite 2700
24 Indianapolis, IN 46204
25 Tel: (317) 237-0300

26 Jeffrey S. Roberts
27 Jeff.roberts@faegrebd.com
28 FAEGRE BAKER DANIELS LLP
3200 Wells Fargo
1700 Lincoln Street
Denver, CO 80203
Tel: (303) 607-3500

Stephen M. Judge
Steve.judge@faegrebd.com
FAEGRE BAKER DANIELS LLP
202 S. Michigan Street, Suite 1400
South Bend, IN 46601
Tel: (574) 234-4149

Counsel for Defendants Technicolor SA and
Technicolor USA, Inc.

1 Pursuant to General Order No. 45, § X-B, the filer asserts that concurrence in the filing of
2 this document has been obtained from each of the above signatories.

3
4 Dated: November 5, 2014

By: /s/ Jason C. Murray
Jason C. Murray

5 **IT IS SO ORDERED.**

6
7 Dated: 11/24/2014

