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Attorneys for Defendants  
 Daewoo Electronics Corporation and  
 Daewoo Electronics America Inc.

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 16 UNITED STATES DISTRICT COURT  
 17 NORTHERN DISTRICT OF CALIFORNIA  
 18 SAN FRANCISCO DIVISION

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 20  
 21 FUNAI ELECTRIC COMPANY, LTD.,  
 22 Plaintiff,  
 23 vs.  
 24 DAEWOO ELECTRONICS CORPORATION,  
 25 ET AL.,  
 26 Defendants.

Case No. C 04-1830 JCS

**STIPULATION AND ~~PROPOSED~~ ORDER  
 REGARDING FEES, EXPENSES AND  
 COSTS TO BE AWARDED TO FUNAI**

1 Plaintiff Funai Electric Company, Ltd. (“Funai”) and Defendants Daewoo Electronics  
2 Corporation (“DEC”) and Daewoo Electronics America Inc. (“DEAM”) (collectively “Defendants”)  
3 hereby stipulate and request entry of this proposed order as follows:

4 WHEREAS, on January 5, 2009, this Court entered its Order Re Post Trial Motions,  
5 awarding Funai attorneys’ fees, expenses and costs according to proof;

6 WHEREAS, on March 10, 2009, the Court of Appeals for the Federal Circuit docketed the  
7 Defendants’ appeal and Funai’s cross-appeal;

8 WHEREAS, on June 12, 2009, Funai submitted its Renewed Application for Attorneys’ Fees  
9 [D.I.s 940 and 957], which application is still pending;

10 WHEREAS, on June 18, 2009, the Clerk of this Court taxed costs in the amount of  
11 \$47,852.74;

12 WHEREAS, on June 25, 2009, Funai submitted its Motion for Review of Clerk’s Taxation of  
13 Costs [D.I. 953], which motion is still pending;

14 WHEREAS, on July 24, 2009, Funai submitted its Renewed Application for Expenses  
15 [D.I. 977], which application is still pending;

16 IT IS HEREBY STIPULATED THAT:

17 1. Funai shall be awarded a total of \$3,952,147.26 in attorneys’ fees and expenses under  
18 35 U.S.C. § 285, and taxed costs in the amount of \$47,852.74.

19 2. Upon signed judicial approval of this Stipulation, Funai hereby withdraws its  
20 Renewed Application for Attorneys’ Fees, Motion for Review of Clerk’s Taxation of Costs and  
21 Renewed Application for Expenses.

22 3. Within two weeks from signed judicial approval of this Stipulation, Daewoo intends,  
23 by and through its counsel, to deposit an additional \$4,000,000.00 with the Clerk of Court for the  
24 Southern District of Florida in order to obtain a stay of enforcement as to the \$3,952,147.30 award of  
25 attorneys’ fees, expenses and the \$47,852.74 in taxed costs.

26 4. Upon deposit of the funds described in paragraph 3 above, all enforcement  
27 proceedings as to Funai’s attorneys’ fees, expenses and costs awards shall be stayed.

28 5. To the extent the Court of Appeals for the Federal Circuit vacates, reverses, remands

1 or otherwise modifies this Court's findings of liability regarding one or more of the patents-in-suit,  
2 or vacates, reverses, remands or otherwise modifies this Court's findings regarding Funai's claim for  
3 successor liability, Funai and Defendants agree that any party is entitled to seek a re-calculation of  
4 the stipulated amounts herein and request this Court to either increase or decrease the award of  
5 attorneys' fees, expenses or taxed costs, as appropriate under the circumstances.

6  
7 Dated: August 11, 2009

8  
9 MORGAN LEWIS & BOCKIUS LLP

KIRKLAND & ELLIS LLP

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12 By: /s/ Michael J. Lyons

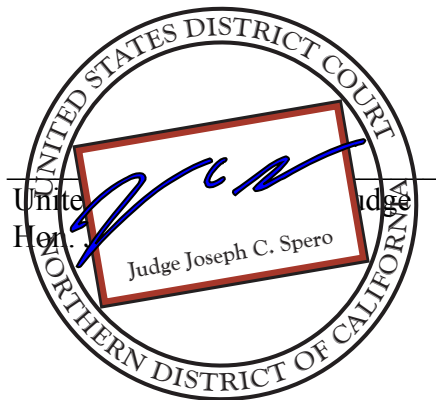
By: Jenny N. Lee

13 Michael J. Lyons  
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17 Funai Electric Company, Ltd.

Perry R. Clark  
Jenny N. Lee  
Sarah Forney  
Marc Tarlock  
Attorneys for Defendants  
Daewoo Electronics Corporation, et al.

18 PURSUANT TO STIPULATION, IT IS SO ORDERED.

19  
20 Dated: August 12, 2009



1 Pursuant to General Order No. 45, Section X(B) regarding signatures, I, Michael J. Lyons,  
2 attest that concurrence in the filing of this document has been obtained from each of the other  
3 signatories. I declare under penalty of perjury under the laws of the United States of America that  
4 the foregoing is true and correct. Executed this 11th day of August 2009, at Palo Alto.

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7 /s/ Michael J. Lyons  
8 Michael J. Lyons  
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