	Case 3:07-cv-00084-SI	Document 5	Filed 01/16/2007	Page 1 of 4				
1 2 3	JEROME C. ROTH (SBN 159483) MUNGER, TOLLES & OLSON LLP 560 Mission Street Twenty-Seventh Floor San Francisco, CA 94105-2907 Telephone: (415) 512-4000 Facsimile: (415) 512-4007 <i>jerome.roth@mto.com</i>							
4								
5 6	Attorneys for Defendant LG.PHILIPS LCD AMERICA, INC.							
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9								
10	UNITED STATES DISTRICT COURT							
11	NORTHERN DISTRICT OF CALIFORNIA							
12	Sara Cabezas, individually a	nd on bobalf of all)7-00084 (MMC)				
13	those similarly situated,			N FOR EXTENSION OF				
14	Plaintiff,		TIME ; ORDE					
15	VS.		Honorable Max	ine M. Chesney				
16	LG.Philips LCD Co. Ltd., Lo America, Inc.: Samsung Elec							
17	America, Inc.; Samsung Electronics Co. Ltd.; Sharp Corporation; Sharp Electronics Corporation; Toshiba Corporation; Toshiba							
18	Matsushita Display Technol Hitachi Ltd.; Hitachi Display	ogy Co., Ltd.;						
19 20	America Ltd.; Hitachi Electr (USA), Inc.; Sanyo Epson Ir	naging Devices						
20	Corporation; NEC Corporati Technologies, Ltd.; NEC Ele							
21 22	Inc.; IDT International Ltd.; International Display Techno							
22	International Display Techno AU Optronics Corporation A	America; Chi Mei						
23 24	Optoelectronics; Chi Mei Op USA, Inc.; Chunghwa Pictur Hannstar Display Corporatio	re Tubes Ltd.;						
25	Defendan							
26		ເວ.						
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28								
	1237441.1			TPULATION FOR EXTENSION CASE NO. C 07-00084 (MMC)				

1	WHEREAS plaintiff filed a complaint in the above-captioned case on or about				
2	December 15, 2006;				
3	WHEREAS plaintiff alleges antitrust violations by manufacturers of Liquid				
4	Crystal Display ("LCD") products;				
5	WHEREAS more than fifteen complaints have been filed to date in federal district				
6	courts throughout the United States by plaintiffs purporting to bringing class actions on behalf of				
7	indirect purchasers alleging antitrust violations by manufacturers of LCD products (collectively,				
8	"the LCD Cases");				
9	WHEREAS there is a motion pending before the Judicial Panel on Multidistrict				
10	Litigation to transfer the LCD Cases to the Northern District of California for coordinated or				
11	consolidated pretrial proceedings pursuant to 28 U.S.C. § 1407;				
12	WHEREAS plaintiff anticipates the possibility of Consolidated Amended				
13	Complaints in the LCD Cases;				
14	WHEREAS plaintiff and LG Philips LCD America, Inc. ("LPL America") have				
15	agreed that an orderly schedule for any response to the pleadings in the LCD Cases would be				
16	more efficient for the parties and for the Court;				
17	WHEREAS plaintiff agrees that the deadline for LPL America to respond to the				
18	Complaint shall be extended until the earlier of the following two dates: (1) forty-five days after				
19	the filing of a Consolidated Amended Complaint in the LCD Cases; or (2) forty-five days after				
20	plaintiff provides written notice to LPL America that he does not intend to file a Consolidated				
21	Amended Complaint, provided that such notice may be given only after the initial case				
22	management conference in the MDL transferee court in this case;				
23	WHEREAS plaintiff further agrees that this extension is available, without further				
24	stipulation with counsel for plaintiff, to all named defendants who notify plaintiff in writing of				
25	their intention to join this extension;				
26	WHEREAS this Stipulation does not constitute a waiver by LPL America or any				
27	defendant of any defense, including but not limited to the defenses of lack of personal or subject				
28					
	1 STIPULATION FOR EXTENSION				

1	matter jurisdiction, insufficiency of process, insufficiency of service of process, or improper						
2	2 venue.	venue.					
3	3 PLAINTIFF AND DEFENDANT I	PLAINTIFF AND DEFENDANT LPL AMERICA, BY AND THROUGH THEIR					
4	RESPECTIVE COUNSEL OF RECORD, HEREBY STIPULATE AS FOLLOWS:						
5	1. The deadline for LPL America to respond to the Complaint shall be						
6	extended until the earlier of the following two dates (1) forty-five days after the filing of a						
7	Consolidated Amended Complaint in the LCD Cases; or (2) forty-five days after the plaintiff						
8	provides written notice that he does not intend to file a Consolidated Amended Complaint,						
9	provided that such notice may be given only after the initial case management conference in the						
10	MDL transferee court in this case.						
11	2. This extension is available, without further stipulation with counsel for						
12	plaintiff or further order of the Court, to all named defendants who notify plaintiff in writing of						
13	their intention to join this extension.						
14	IT IS SO STIPULATED.						
15	5						
16	6 DATED: January 12, 2007 H	Respectfully submitted,					
	MUNGER, TOLLES & OLSON LLP						
17	7	AUNGER, TOLLES & OLSON LLP					
17 18		AUNGER, TOLLES & OLSON LLP					
	8	By:/s/ Jerome C. Roth					
18	9 E	By: /s/ Jerome C. Roth JEROME C. ROTH Attorneys for Defendant					
18 19	, 8 9 1	By: /s/ Jerome C. Roth JEROME C. ROTH					
18 19 20	 8 9 0 1 Of Counsel: 	By: /s/ Jerome C. Roth JEROME C. ROTH Attorneys for Defendant					
18 19 20 21	 F F F Of Counsel: Michael R. Lazerwitz Jeremy J. Calsyn 	By: /s/ Jerome C. Roth JEROME C. ROTH Attorneys for Defendant					
 18 19 20 21 22 	 ⁷ 8 9 9 1 0 1 1 0 f Counsel: 2 1 2 3 4 1 4 1 4 1 4 1 	By: /s/ Jerome C. Roth JEROME C. ROTH Attorneys for Defendant					
 18 19 20 21 22 23 	 9 9 9 1 0f Counsel: 1 1 1 1 0f Counsel: 2 1 2 1 2 3 4 1 4 4 4 4 5 1 2 4 4<td>By: /s/ Jerome C. Roth JEROME C. ROTH Attorneys for Defendant</td>	By: /s/ Jerome C. Roth JEROME C. ROTH Attorneys for Defendant					
 18 19 20 21 22 23 24 	 9 9 9 1 0f Counsel: 2 Michael R. Lazerwitz 3 Jeremy J. Calsyn Lee F. Berger 4 CLEARY GOTTLIEB STEEN & HAMILTON LLP 5 2000 Pennsylvania Avenue, NW Washington, DC 20006 6 Telephone: (202) 974-1500 	By: /s/ Jerome C. Roth JEROME C. ROTH Attorneys for Defendant					
 18 19 20 21 22 23 24 25 	 9 9 9 1 0 1 1 0 of Counsel: 2 2 3 3 4 4	By: /s/ Jerome C. Roth JEROME C. ROTH Attorneys for Defendant					
 18 19 20 21 22 23 24 25 26 	 9 9 1 0 1 1 0f Counsel: 2 1 1 2 3 3 4 4 5 4 5 5 2000 Pennsylvania Avenue, NW 4 5 4 4 5 4 5 4 5 5 6 7 6 7 	By: /s/ Jerome C. Roth JEROME C. ROTH Attorneys for Defendant					

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1	DATED: January 12, 2007		FURTH LEHMAN	NN & GRANT LLP		
2						
3				/s/ Jon T. King		
4			TH	IAEL P. LEHMANN IOMAS P. DOVE 'OPHER L. LEBSOCK		
5				JON T. KING prneys for Plaintiff		
6			Sz	ARA CABEZAS		
7						
8						
9	PURSUANT TO STIPULAT	TION IT IS SO				
10	ORDERED:	1010, 11 15 50				
11	Dated:		<u> </u>	Maxine M. Chesing		
12				nited States District Court		
13	CERTIFICATION I, Jerome C. Roth, am the ECF User whose identification and password are being used to file this Stipulation For Extension Of Time. In compliance with General Order 45.X.B, I hereby attest that Jon T. King has concurred in this filing.					
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