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 CORPORATION AMERICA

15 UNITED STATES DISTRICT COURT
 16 NORTHERN DISTRICT OF CALIFORNIA
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18 GENERAL DIGITAL CORPORATION,
 on behalf of itself and all others similarly
 19 situated,
 20 Plaintiff,
 21 v.
 22 LG PHILIPS LCD CO., LTD., ET AL.,
 23 Defendants.

CASE NO. C-07-0452-MJJ
 MDL 1827 In Re TFT-LCD (Flat Panel)
 Antitrust Litigation (Pending)

**STIPULATION AND [PROPOSED]
 ORDER FOR EXTENSION OF TIME TO
 RESPOND TO COMPLAINT**

24 WHEREAS plaintiff filed a complaint in the above-captioned case on January 23, 2007;
 25 WHEREAS plaintiff alleges antitrust violations by manufacturers of Liquid Crystal
 26 Display (“LCD”) products;
 27 WHEREAS more than 10 complaints have been filed to date in federal district courts
 28 throughout the United States by plaintiffs purporting to bring class actions on behalf of direct

1 purchasers alleging antitrust violations by manufacturers of LCD products (collectively, “the LCD
2 Cases”);

3 WHEREAS there is a motion pending before the Judicial Panel on Multidistrict Litigation
4 to transfer the LCD Cases to the Northern District of California for coordinated or consolidated
5 pretrial proceedings pursuant to 28 U.S.C. § 1407;

6 WHEREAS plaintiff anticipates the possibility of Consolidated Amended Complaints in
7 the LCD Cases;

8 WHEREAS plaintiff and defendant AU Optronics Corporation America (“AUO
9 America”) have agreed that an orderly schedule for any response to the pleadings in the LCD
10 Cases would be more efficient for the parties and for the Court;

11 WHEREAS plaintiff agrees that the deadline for AUO America to respond to the
12 Complaint shall be extended until the earlier of the following dates: (1) 45 days after the filing of
13 a Consolidated Amended Complaint in the LCD Cases; or (2) 45 days after plaintiff provides
14 written notice to AUO America that it does not intend to file a Consolidated Amended Complaint,
15 provided that such notice may be given only after the initial case management conference in the
16 MDL transferee court in this case;

17 WHEREAS plaintiff further agrees that this extension is available, without further
18 stipulation with counsel for plaintiff, to all named defendants who notify plaintiff in writing of
19 their intention to join this extension;

20 WHEREAS this Stipulation does not constitute a waiver by AUO America or any
21 defendant of any defense, including but not limited to the defenses of lack of personal jurisdiction
22 or subject matter jurisdiction, insufficiency of service of process, or improper venue.

23 PLAINTIFF AND DEFENDANT AUO AMERICA, BY AND THROUGH THEIR
24 RESPECTIVE COUNSEL OF RECORD, STIPULATE AS FOLLOWS:

25 1. The deadline for AUO America to respond to the Complaint shall be extended until
26 the earlier of the following dates: (1) 45 days after the filing of a Consolidated Amended
27 Complaint in the LCD Cases; or (2) 45 days after plaintiff provides written notice to AUO
28 America that it does not intend to file a Consolidated Amended Complaint, provided that such

