

1 David P. Germaine (*Admitted Pro Hac Vice*)
 2 VANEK, VICKERS & MASINI, P.C.
 3 111 South Wacker Drive, Suite 4050
 4 Chicago, Illinois 60606
 Telephone: (312) 224-1500
 Facsimile: (312) 224-1510
 E-mail: dgermaine@vaneklaw.com

5
 6 *Counsel for Plaintiff, ATS Claim, LLC*
 [additional counsel listed on signature page]

7
 8 UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 9 SAN FRANCISCO DIVISION

10 IN RE TFT-LCD (FLAT PANEL) ANTITRUST
 LITIGATION

No. M 07-1827 SI-FS

MDL No. 1827

11 This Document Relates To: Case No.: 09-1115 SI

12 ATS Claim, LLC

13 Plaintiff,

14 vs.

15 Epson Electronics America, Inc., et al

16 Defendants.

**STIPULATION OF DISMISSAL
 AND [PROPOSED] ORDER**

Honorable Susan Illston

18 Plaintiff ATS Claim, LLC (“ATS”), and Defendants AU Optronics Corporation, AU
 19 Optronics Corporation America (collectively “AUO”), Hannstar Display Corporation (“HannStar”),
 20 Hitachi, Ltd., Hitachi Displays, Ltd., Hitachi Electronic Devices (USA) , Inc. (collectively “Hitachi”),
 21 and LG Display Co., Ltd. and LG Display America, Inc. (collectively “LG Display”), by their
 22 respective attorneys and under Rule 41(a)(2) of the Federal Rules of Civil Procedure, hereby stipulate
 23 to the dismissal of the present action with prejudice and state as follows:
 24

- 25 1. ATS, AUO, HannStar, Hitachi, and LG Display seek the dismissal of this action with
 26 prejudice.
 27

28
 STIPULATION OF DISMISSAL AND [PROPOSED] ORDER
 MASTER FILE NO. M07-1827 SI (CASE NO. 09-1115 SI)

1 Dated: November 2, 2010

K&L GATES LLP

2
3 By: /s/Ramona M. Emerson

4 Hugh F. Bangasser
5 Ramona M. Emerson
6 925 Fourth Avenue, Suite 2900
7 Seattle, WA 98104
8 Telephone: (206) 623-7580
9 Facsimile: (206) 623-7022

10 Jeffrey L. Bornstein
11 Four Embarcadero Center, Suite 1200
12 San Francisco, CA 94111
13 Telephone: (415) 882-8200
14 Facsimile: (415) 882-8220

15 *Counsel for Defendant HannStar Display Corporation*

16 Dated: November 2, 2010

MORGAN LEWIS & BOCKIUS, LLP

17
18 By: /s/Kent M. Roger

19 Kent M. Roger
20 One Market Plaza, Spear Street Tower
21 San Francisco, CA 94105
22 Telephone: (415) 442-1000
23 Facsimile: (415) 442-1001

24 *Counsel for Defendants Hitachi, Ltd., Hitachi Displays,*
25 *Ltd., Hitachi Electronic Devices (USA), Inc.*

26 Dated: November 2, 2010

CLEARY GOTTlieb STEEN & HAMILTON LLP

27
28 By: /s/Michael R. Lazerwitz

Michael R. Lazerwitz
Jeremy J. Calsyn
Lee F. Berger
2000 Pennsylvania Ave., NW
Washington, D.C. 20006
Telephone: (202) 974-1500
Facsimile: (202) 974-1919

Counsel for Defendants LG Display Co., Ltd., LG
Display America, Inc.

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO DIVISION

4 IN RE TFT-LCD (FLAT PANEL) ANTITRUST
5 LITIGATION

No. M 07-1827 SI-FS

MDL No. 1827

6 This Document Relates To: Case No.: 09-1115 SI

7 ATS Claim, LLC

Plaintiff,

8 vs.

9 Epson Electronics America, Inc., et al

10 Defendants.

**STIPULATION OF DISMISSAL
AND [PROPOSED] ORDER**

Honorable Susan Illston

11
12 The Court having considered the stipulation of the parties, and good cause appearing therefor,
13 orders as follows:

- 14 1. ATS Claim, LLC's action is dismissed with prejudice as against Defendants AU
15 Optronics Corporation, AU Optronics Corporation America, HannStar Display
16 Corporation, Hitachi, Ltd., Hitachi Displays, Ltd., Hitachi Electronic Devices (USA), Inc.,
17 LG Display Co., Ltd., and LG Display America, Inc. pursuant to FRCP 41(a)(2).
18 2. Each party shall bear their own costs and attorneys' fees.

19 **IT IS SO ORDERED.**

20 Dated: _____

21
22 

23
24 _____
25 Hon. Susan Y. Illston
26 United States District Judge