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19 *Counsel for Plaintiffs*

20 [Additional counsel listed on signature page]

21 UNITED STATES DISTRICT COURT  
 22 NORTHERN DISTRICT OF CALIFORNIA  
 23 SAN FRANCISCO DIVISION

24 In re: TFT-LCD (FLAT PANEL)  
 25 ANTITRUST LITIGATION

Master Docket No. M:07-cv-1827-SI

26 This Document Relates to:

27 *Motorola Mobility, Inc. v. AU Optronics*  
 28 *Corporation, et al., Case No. 3:09-cv-5840-SI*

*Target Corporation, et al. v. AU Optronics*  
*Corporation, et al., Case No. CV:10-4945 SI*

*AT&T Mobility LLC, et al. v. AU Optronics*  
*Corporation, et al., C 09-4997 SI*

Defendants.

**STIPULATION AND [PROPOSED]  
 ORDER EXTENDING DISCOVERY  
 CUTOFF AS TO DEPOSITION OF WOO  
 JONG LEE**

1           Whereas, plaintiffs Motorola Mobility, Inc.; Target Corporation; Sears, Roebuck and Co.;  
2 Kmart Corporation; Old Comp Inc.; Good Guys, Inc.; RadioShack Corporation; Newegg Inc.;  
3 AT&T Mobility, LLC; AT&T Corp.; AT&T Services, Inc.; BellSouth Telecommunications, Inc.;  
4 Pacific Bell Telephone Company; AT&T Operations, Inc.; AT&T DataComm, Inc.; and  
5 Southwestern Bell Telephone Company ("Plaintiffs") have requested the depositions of Woo Jong  
6 Lee and Richard Ha, former employees of defendants Samsung SDI Co., Ltd. and Samsung SDI  
7 America, Inc. ("SDI");

8           Whereas, SDI has requested that Plaintiffs complete the deposition of another former SDI  
9 employee on December 7, 2011, before deciding whether to pursue the deposition of Mr. Lee;

10           Whereas the parties are in discussions regarding the deposition of Mr. Ha;

11           Whereas, the fact discovery cut-off in the Direct Action Plaintiffs' track one cases is  
12 December 8, 2011;

13           THEREFORE, SDI, by its counsel, and Plaintiffs, by their counsel, stipulate and agree as  
14 follows:

15           1.       The fact discovery cutoff date of December 8, 2011 set forth in the Order  
16 Modifying Pretrial Schedule for "Track One" Direct Action Plaintiff and State Attorney General  
17 Cases (MDL Dkt. No. 3110) is extended up to and including January 31, 2012, solely to allow  
18 Plaintiffs to seek and, as necessary and/or agreed, take the depositions of Woo Jong Lee and  
19 Richard Ha.

20           2.       If disputes arise at the deposition, Plaintiffs will have five court days to move to  
21 compel further responses.

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1 Dated: December 8, 2011

2 /s/ Nathaniel J. Wood

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15 *Mobility, LLC, AT&T Corp., AT&T Services, Inc.,*  
16 *BellSouth Telecommunications, Inc., Pacific Bell*  
17 *Telephone Company, AT&T Operations, Inc., AT&T*  
18 *DataComm, Inc., and Southwestern Bell Telephone*  
19 *Company; Target Corporation; Sears,*  
20 *Roebuck and Co.; Kmart Corporation; Old Comp*  
21 *Inc.; Good Guys, Inc.; RadioShack Corporation;*  
22 *and Newegg Inc.*

19 /s/ Michael W. Scarborough

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26 *Counsel for Defendants Samsung SDI America, Inc.*  
27 *and Samsung SDI Co., Ltd.*

1 **IT IS SO ORDERED.**

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3 Dated: 12/12, 2011

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Susan Illston, United States District Judge

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