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 Epson Imaging Devices Corporation,
 8 and Epson Electronics America, Inc.

9
 10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA
 12 SAN FRANCISCO DIVISION
 13

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

MDL File No. 3:07-md-1827-SI
 MDL No. 1827

15
 16 This Document Relates to:

17 *Motorola Mobility, Inc. v. AU Optronics*
 18 *Corporation, et al., C 09-5840 SI*

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

21 *Target Corp., et al. v. AU Optronics Corp., et al.,*
Case No. CV-04945 SI

22 *Dell Inc. and Dell Products L.P. v. Sharp Corp.*
 23 *et al., Case No. CV 10-1064 SI*

**STIPULATION AND ~~PROPOSED~~
 ORDER MODIFYING FACT
 DISCOVERY CUTOFF DATE AND
 EXTENSION OF TIME TO MOVE
 TO COMPEL**

1 Plaintiffs Motorola Mobility, Inc. (“Motorola”); AT&T Mobility, LLC, AT&T Corp.,
2 AT&T Services, Inc., Pacific Bell Telephone Company, AT&T Operations, Inc., AT&T
3 DataComm, Inc., Southwestern Bell Co., (“AT&T”)¹; Target Corp.; Sears Roebuck and Co.;
4 Kmart Corp.; Old Comp Inc.; Good Guys, Inc.; RadioShack Corp.; Newegg Inc.; Dell Inc., and
5 Dell Products L.P.’s (“Dell”) (collectively, “Plaintiffs”) and Defendants Epson Imaging Devices
6 Corporation and Epson Electronics America, Inc. (collectively, “Epson Defendants”) hereby
7 stipulate as follows:

8 **STIPULATION**

9 WHEREAS discovery closes in this case on December 8, 2011, as set forth in the
10 Stipulation and Order Modifying Pretrial Schedule for “Track One” Direct Action Plaintiff and
11 State Attorney General Actions (Dkt. No. 3110, the “Scheduling Order”);

12 WHEREAS Plaintiffs Motorola and Dell served Direct Action Plaintiffs’ First Set of
13 Interrogatories To Epson Defendants and Direct Action Plaintiffs’ First Set of Requests For
14 Admission To Epson Defendants on June 16, 2011;

15 WHEREAS Plaintiffs served their Joint Set of Requests for Production of Documents and
16 Interrogatories on Epson Defendants in the above-captioned cases on November 2, 2011;

17 WHEREAS Epson Defendants and Motorola continue to meet and confer over several
18 outstanding discovery issues and are attempting to answer questions regarding their respective
19 data productions informally without the need for formal discovery;

20 WHEREAS Plaintiffs and Epson Defendants have conferred and agreed to the extension
21 of the close of fact discovery set forth in the Scheduling Order for the limited purposes identified
22 below;

23 NOW, THEREFORE, the Parties, through their undersigned respective counsel, stipulate
24 and agree as follows:

25
26 _____
27 ¹ This stipulation is without prejudice to the Administrative Motion To Modify AT&T’s
28 Trial Schedule filed on December 8, 2011, or to Defendants’ opposition thereto.

1 Dated: December 13, 2011

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6 By: /s/ Joshua Stokes

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9 AT&T Corp., AT&T Services, Inc.,
10 Pacific Bell Telephone Company,
11 AT&T Operations, Inc., AT&T
12 DataComm, Inc., Southwestern Bell
Co., Target Corp., Sears, Roebuck and
Co., Kmart Corp., Old Comp Inc.,
Good Guys, Inc., RadioShack Corp.,
Newegg Inc.

13 Dated: December 13, 2011

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22 Attorneys for Plaintiffs Dell Inc. and
23 Dell Products L.P.
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IT IS SO ORDERED.

Dated: 12/16, 2011



The Honorable Susan Illston
Judge of the District Court

ATTESTATION: Pursuant to N.D. Cal. General Order 45, Part X-B, the filer attests that concurrence in the filing of this document has been obtained from each signatory hereto.

Dated: December 13, 2011

By: /s/ Derek Foran
Derek Foran