

1 PILLSBURY WINTHROP SHAW PITTMAN LLP
 JOHN M. GRENFELL (CA Bar No. 88500)
 2 john.grenfell@pillsburylaw.com
 JACOB R. SORENSEN (CA Bar No. 209134)
 3 jake.sorensen@pillsburylaw.com
 FUSAE NARA (pro hac vice)
 4 fusae.nara@pillsburylaw.com
 ANDREW D. LANPHERE (CA Bar No. 191479)
 5 andrew.lanphere@pillsburylaw.com
 50 Fremont Street
 6 San Francisco, CA 94105
 Telephone: (415) 983-1000
 7 Facsimile: (415) 983-1200

8 Attorneys for Defendants
 SHARP CORPORATION and
 9 SHARP ELECTRONICS CORPORATION

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

13	IN RE: TFT-LCD (FLAT PANEL) ANTITRUST LITIGATION
14	
15	This Document Relates To:
16	Case No. 09-cv-5609 SI
17	NOKIA CORPORATION and NOKIA, INC.,
18	Plaintiffs,
19	v.
20	AU OPTRONICS CORPORATION, et al.
21	Defendants.

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

**STIPULATION AND [PROPOSED]
 ORDER MODIFYING DEADLINE
 FOR FILING OF MOTIONS TO
 COMPEL**

22
 23 Plaintiffs Nokia Corporation and Nokia, Inc. and Defendants (collectively,
 24 “Parties”) hereby stipulate as follows:

25 **STIPULATION**

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

1 WHEREAS the Court has entered an Order extending the close of fact discovery set
2 forth in the Scheduling Order for the limited purpose of allowing sufficient time for
3 defendants to take the depositions of Nokia employees Juha Liukkonen and Timo Mustonen
4 (Dkt. No. 4254);

5 WHEREAS the parties have submitted a Stipulation and Proposed Order to the
6 Court extending the close of fact discovery set forth in the Scheduling Order for the limited
7 purpose of extending the deadline for which Nokia and certain other Direct Action
8 Plaintiffs in Track One have to respond to discovery requests served by defendants between
9 October 31 and November 4, 2011 and to update Exhibit A (chart of conspiracy evidence)
10 to previously served discovery responses (Dkt. 4313);

11 WHEREAS Nokia and defendants are currently meeting and conferring concerning
12 various issues related to: (1) Nokia's responses to defendants' written discovery served as
13 of December 8, 2011; (2) Nokia's production of documents as of December 8, 2011; (3) the
14 deposition testimony of Nokia's employees and Nokia pursuant to Fed. R. Civ. P. 30(b)(6)
15 as of December 8, 2011 (collectively, "Nokia's Discovery Responses"); and (4) defendants'
16 discovery responses, production of documents and sufficiency of deposition testimony
17 pursuant to Fed. R. Civ. P. 30(b)(6) (collectively, "Defendants' Discovery Responses");

18 WHEREAS Nokia and defendants hope to resolve some or all of these issues
19 informally, without the need to file motions to compel and seek the Court's involvement;

20 WHEREAS the current deadline for parties to file motions to compel with respect to
21 Nokia's Discovery Responses or Defendants' Discovery Responses is December 15, 2011;
22 and

23 WHEREAS in an effort to facilitate the informal resolution of any disputes, the
24 parties wish to extend the deadline for Nokia or defendants to file any motions to compel
25 with respect to Nokia's Discovery Responses or Defendants' Discovery Responses through
26 January 13, 2012.

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

1 The deadline for Nokia or defendants to file any motion to compel with respect to
2 Nokia's Discovery Responses or Defendants' Discovery Responses is extended through and
3 including January 13, 2012.

4 Dated: December 12, 2011.

5 PILLSBURY WINTHROP SHAW PITTMAN LLP
6 JOHN M. GRENFELL
7 JACOB R. SORENSEN
8 FUSAE NARA
9 ANDREW D. LANPHERE
10 50 Fremont Street
11 San Francisco, CA 94105
12 Phone: (415) 983-1000
13 Fax: (415) 983-1200

14 By: /s/ Andrew Lanphere

15 Attorneys for Defendants SHARP
16 CORPORATION and SHARP ELECTRONICS
17 CORPORATION

18 GIBSON, DUNN & CRUTCHER LLP
19 JOEL S. SANDERS (State Bar No. 107234)
20 RACHEL S. BRASS (State Bar No. 219301)
21 REBECCA JUSTICE LAZARUS (State Bar No.
22 227330)
23 SERENA G. LIU (State Bar No. 265977)
24 555 Mission Street, Suite 3000
25 San Francisco, CA 94105-2933
26 TEL: (415) 393-8200
27 FAX: (415) 393-8306

28 By: /s/ Rachel S. Brass

Attorneys for Defendants CHUNGHWA
PICTURE TUBES, LTD. and TATUNG
COMPANY OF AMERICA, INC.

MORRISON & FOERSTER LLP
MELVIN R. GOLDMAN (State Bar No. 34097)
STEPHEN P. FRECCERO (State Bar No.
131093)
DEREK F. FORAN (State Bar No. 224569)
425 Market Street
San Francisco, CA 94105-2482
TEL: (415) 268-7000
FAX: (415) 268-7522

By: /s/ Derek F. Foran

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Attorneys for Defendants SEIKO EPSON CORPORATION, EPSON IMAGING DEVICES CORPORATION and EPSON ELECTRONICS AMERICA, INC.

MORGAN LEWIS & BOCKIUS LLP
KENT M. ROGER (State Bar No. 95987)
MICHELLE KIM-SZROM (State Bar No. 252901)
One Market, Spear Street Tower
San Francisco, CA 94105-1126
Phone: (415) 442-1000
Fax: (415) 442-1001

By: /s/ Kent M. Roger

Attorneys for Defendants HITACHI, LTD., HITACHI DISPLAYS, LTD. and HITACHI ELECTRONIC DEVICES (USA), INC.

SHEPPARD MULLIN RICHTER & HAMPTON LLP
GARY L. HALLING (State Bar No. 66087)
JAMES L. MCGINNIS (State Bar No. 95788)
MICHAEL W. SCARBOROUGH (State Bar No. 203524)
Four Embarcadero Center, 17th Floor
San Francisco, CA 94111-4106
TEL: (415) 434-9100
FAX: (415) 434-3947

By: /s/ Michael W. Scarborough

Attorneys for Defendants SAMSUNG SDI CO., LTD. and SAMSUNG SDI AMERICA, INC.

COVINGTON & BURLING LLP
TIMOTHY C. HESTER (*pro hac vice*)
ROBERT D. WICK (*pro hac vice*)
1201 Pennsylvania Avenue, NW
Washington, DC 20004
Tel: (202) 662-6000
Fax: (202) 662-6291

By: /s/ Robert D. Wick

Attorneys for Defendants SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS AMERICA, INC., and SAMSUNG SEMICONDUCTOR, INC.

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WHITE & CASE LLP
CHRISTOPHER M. CURRAN (*pro hac vice*)
JOHN H. CHUNG (*pro hac vice*)
KRISTEN J. MCAHREN (*pro hac vice*)
1155 Avenue of the Americas
New York, NY 10036
Phone: (212) 819-8200
Fax: (212) 354-8113

By: /s/ John H. Chung

Attorneys for Defendants TOSHIBA CORPORATION, TOSHIBA MOBILE DISPLAY CO., LTD., TOSHIBA AMERICA ELECTRONIC COMPONENTS, INC., and TOSHIBA AMERICA INFORMATION SYSTEMS, INC.

ALSTON + BIRD LLP
RANDALL ALLEN (State Bar No. 264067)
275 Middlefield Road, Suite 150
Menlo Park, CA 94025
Tel: (650) 838-2000
Fax: (650) 838-2001

ALSTON + BIRD LLP
LISA BOJKO
VALARIE WILLIAMS
B. PARKER MILLER
1201 West Peachtree Street
Atlanta, GA 30309
Tel: (404) 881-4605
Fax: (404) 253-8385

By: /s/ Lisa Bojko

Attorneys for Plaintiffs NOKIA, INC. and NOKIA CORPORATION

IT IS SO ORDERED.

Dated Entered: 12/16/11



The Honorable Susan Illston
District Court Judge

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.