

1 Richard S. Taffet (pro hac vice)
 2 Kenneth I. Schacter (pro hac vice)
 3 Jon R. Roellke (pro hac vice)
 4 Colin C. West (SBN 184095)
 5 Kristen A. Palumbo (SBN 215857)
 6 BINGHAM MCCUTCHEN LLP
 7 Three Embarcadero Center
 8 San Francisco, CA 94111-4067
 9 (415) 393-2000 (telephone)
 10 (415) 393-2286 (facsimile)
 11 colin.west@bingham.com

12 *Attorneys for Defendants*
 13 Sharp Corporation
 14 Sharp Electronics Corporation

15 [additional parties and counsel listed
 16 in signature block]

17 **UNITED STATES DISTRICT COURT**
 18 **NORTHERN DISTRICT OF CALIFORNIA**
 19 **SAN FRANCISCO DIVISION**

IN RE: TFT-LCD (FLAT PANEL) ANTITRUST LITIGATION) MDL Case No. 3:07-md-1827-SI
This Document Relates to Individual Cases No. 3:10-cv-01064 SI and 3:09-cv-5840-SI) Dell Case No. 3:10-cv-01064-SI) Motorola Case No. 3:09-cv-5840-SI
DELL INC. and DELL PRODUCTS L.P., Plaintiffs, v. SHARP CORPORATION, <i>et al.</i> , Defendants.) JOINT STIPULATION OF EXTENSION OF TIME FOR DELL AND MOTOROLA TO RESPOND TO DEFENDANTS' MOTIONS TO CERTIFY UNDER 28 U.S.C. § 1292(b) AND [PROPOSED] ORDER
MOTOROLA, INC., Plaintiffs, v. AU OPTRONICS CORPORATION, <i>et al.</i> , Defendants.) JOINT STIPULATION OF EXTENSION OF TIME FOR DELL AND MOTOROLA TO RESPOND TO DEFENDANTS' MOTIONS TO CERTIFY UNDER 28 U.S.C. § 1292(b) AND [PROPOSED] ORDER

1 WHEREAS plaintiffs Dell Inc. and Dell Products L.P. (collectively, “Dell”) have an individual
2 lawsuit (Case No. 3:10-cv-01064-SI) against defendants Sharp Corporation, Sharp Electronics
3 Corporation, Hitachi Displays, Ltd., Hitachi Electronic Devices (USA), Inc., Hitachi, Ltd., Epson
4 Imaging Devices Corporation, Epson Electronics America, Inc., HannStar Display Corporation,
5 Toshiba America Electronic Components, Inc., Toshiba America Information Systems, Inc., Toshiba
6 Corporation and Toshiba Mobile Display Co., Ltd. (collectively the “Dell Defendants”);

7 WHEREAS plaintiff Motorola, Inc. has an individual lawsuit (Motorola Case No. 3:09-cv-
8 5840-SI) against defendants AU Optronics Corporation, AU Optronics Corporation America, Inc., Chi
9 Mei Corporation, Chi Mei Optoelectronics Corporation, Chi Mei Optoelectronics Corporation USA,
10 Inc., CMO Japan Co. Ltd., Nexgen Mediatech, Inc., Nexgen Mediatech USA, Inc., Chunghwa Picture
11 Tubes Ltd., Tatung Company of America, Inc., HannStar Display Corporation, LG Display Co. Ltd.,
12 LG Display America, Inc., Samsung Electronics Co., Ltd., Samsung Semiconductor, Inc., Samsung
13 Electronics America, Inc., Sharp Corporation, Sharp Electronics Corporation, Toshiba Corporation,
14 Toshiba America Electronic Components, Inc., Toshiba Mobile Display Co., Ltd., Toshiba America
15 Information Systems, Inc., Epson Imaging Devices Corporation, and Epson Electronics America, Inc.
16 (collectively the “Motorola Defendants”);

17 WHEREAS the Dell Defendants and Motorola Defendants are collectively referred to herein as
18 the “Stipulating Defendants”;

19 WHEREAS on April 13, 2011, the Dell Defendants filed a Motion to Certify the Court’s March
20 16, 2011 Order granting in part and denying in part the Dell Defendants’ Joint Motion to Dismiss the
21 Dell Complaint for interlocutory appeal pursuant to 28 U.S.C. § 1292(b) (Dkt. No. 2648);

22 WHEREAS on April 13, 2011, the Motorola Defendants filed a Motion to Certify the Court’s
23 March 28, 2011 Order denying the Motorola Defendants’ Joint Motion to Dismiss the Second
24 Amended Motorola Complaint for interlocutory appeal pursuant to 28 U.S.C. § 1292(b) (Dkt. No.
25 2649);

26 WHEREAS the Stipulating Defendants noticed hearings on their respective Motions to Certify
27 for May 20, 2011;

1 WHEREAS Dell and Motorola, Inc. each desire an additional amount of time to respond to the
2 Stipulating Defendants' respective Motions to Certify;

3 WHEREAS, given the similarity of issues raised in the Motions to Certify, Dell, Motorola, Inc.,
4 and the Stipulating Defendants agree that it would promote judicial economy for these motions to be
5 heard on the same day;

6 THEREFORE, Dell, Motorola, Inc., and the Stipulating Defendants hereby agree as follows:

- 7 • Dell and Motorola shall have until May 2, 2011 to respond to the Stipulating
8 Defendants' respective Motions to Certify (Dkt. Nos. 2648 and 2649);
- 9 • Stipulating Defendants shall have until May 13, 2011 to file replies in support of
10 Stipulating Defendants' respective Motions to Certify (Dkt. Nos. 2648 and 2649);
- 11 • The parties will request that the hearing date on these motions be reset for May 27,
12 2011 or the Court's soonest available hearing date thereafter.

13 Respectfully submitted,

14
15 Dated: April 27, 2011

16 By: /s/ Jon R. Roellke
17 Jon R. Roellke (pro hac vice)
18 BINGHAM MCCUTCHEN LLP
19 2020 K Street NW
20 Washington, DC 20006-1806
21 (202) 373-6000 (telephone)

22 Richard S. Taffet (pro hac vice)
23 Kenneth I. Schacter (pro hac vice)
24 BINGHAM MCCUTCHEN LLP
25 399 Park Avenue
26 New York, NY 10022-4689
27 (212) 705-7000 (telephone)

28 Colin C. West (SBN 184095)
BINGHAM MCCUTCHEN LLP
Three Embarcadero Center
San Francisco, CA 94111-4067
(415) 393-2000 (telephone)

*Attorneys for Defendants
Sharp Corporation, Sharp Electronics Corp.*

1 Dated: April 27, 2011

2 By: /s/ Melvin R. Goldman
3 Melvin R. Goldman
4 Stephen P. Freccero
5 Derek F. Foran
6 MORRISON & FOERSTER LLP
7 425 Market Street
8 San Francisco, CA 94105
9 (925) 295-3482 (telephone)

6 David L. Meyer
7 MORRISON & FOERSTER LLP
8 2000 Pennsylvania Avenue, NW
9 Suite 6000
10 Washington, DC 20006-1888

10 *Attorneys for Defendants*
11 *Epson Imaging Devices Corporation, Epson*
12 *Electronics America, Inc.*

13 Dated: April 27, 2011

13 By: /s/ John H. Chung
14 John H. Chung (pro hac vice)
15 WHITE & CASE LLP
16 1155 Avenue of the Americas
17 New York, NY 10036
18 (212) 819-8200 (telephone)

17 Christopher M. Curran (pro hac vice)
18 Kristen J. McAhren (pro hac vice)
19 WHITE & CASE LLP
20 701 Thirteenth Street, NW
21 Washington, DC 20005-3807
22 (202) 626-3600 (telephone)

21 *Attorneys for Defendants*
22 *Toshiba Corporation, Toshiba Mobile Display*
23 *Co., Ltd., Toshiba America Electronic*
24 *Components, Inc. and Toshiba America*
25 *Information Systems, Inc.*

1 Dated: April 27, 2011

By: /s/ Kent Michael Roger
Kent Michael Roger
Morgan Lewis & Bockius LLP
One Market, Spear Street Tower
San Francisco, California 94105
(415) 442-1140 (telephone)

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

8 Dated: April 27, 2011

By: /s/ Ramona M. Emerson
Hugh F. Bangasser (pro hac vice)
Ramona M. Emerson (pro hac vice)
Christopher M. Wyant (pro hac vice)
K&L GATES LLP
925 Fourth Avenue, Suite 2900
Seattle, WA 98104-1158
(206) 623-7580 (telephone)

Jeffrey L. Bornstein
K&L GATES LLP
Four Embarcadero Center, Suite 1200
San Francisco, CA 94111
(415) 882-8200 (telephone)

*Attorneys for Defendant
HannStar Display Corporation*

19 Dated: April 27, 2011

By: /s/ Michael R. Lazerwitz
Michael R. Lazerwitz (pro hac vice)
Jeremy J. Calsyn (SBN 205062)
Lee F. Berger (SBN 222756)
CLEARY GOTTLIEB STEEN & HAMILTON
LLP
2000 Pennsylvania Ave., NW
Washington, DC 20006
(202) 974-1500 (telephone)
(202) 974-1999 (facsimile)
mlazerwitz@cgsh.com

*Attorneys for Defendants
LG Display Co., Ltd. and LG Display America,
Inc.*

1 Dated: April 27, 2011

2 By: /s/ Christopher A. Nedeau
3 Christopher A. Nedeau
4 Carl L. Blumenstein
5 Allison Dibley
6 NOSSAMAN LLP
7 50 California Street, 34th Floor
8 San Francisco, CA 94111
9 (415) 438-7274 (telephone)

10 *Attorneys for Defendants*
11 *AU Optronics Corporation and AU Optronics*
12 *Corporation America, Inc.*

13 Dated: April 27, 2011

14 By: /s/ Patrick J. Ahern
15 Patrick J. Ahern
16 BAKER & MCKENZIE, L.L.P.
17 130 East Randolph Drive
18 Chicago, Illinois 60601
19 (312) 861-3735 (telephone)

20 *Attorneys for Defendants*
21 *Chunghwa Picture Tubes, Ltd. and Tatung*
22 *Company of America, Inc.*

23 Dated: April 27, 2011

24 By: /s/ Christopher B. Hockett
25 Christopher B. Hockett
26 DAVIS, POLK & WARDWELL LLP
27 1600 El Camino Real
28 Menlo Park, CA 94025
(650) 752-2000 (telephone)

Attorneys for Defendants
Chi Mei Corporation, Chi Mei Optoelectronics
Corporation, Chi Mei Optoelectronics USA, Inc.
CMO Japan Co. Ltd., Nexgen Mediatech, Inc. and
Nexgen Mediatech USA, Inc.

1 Dated: April 27, 2011

2 By: /s/ Robert D. Wick
3 Robert D. Wick (pro hac vice)
4 COVINGTON & BURLING LLP
5 One Front Street, 35th Floor
6 San Francisco, CA 94111
7 (415) 591-6000 (telephone)

8 Timothy C. Hester (pro hac vice)
9 Derek Ludwin (pro hac vice)
10 Theodore P. Metzler (pro hac vice)
11 COVINGTON & BURLING LLP
12 1201 Pennsylvania Ave. NW
13 Washington, D.C. 20004
14 (202) 662-6000 (telephone)

15 *Attorneys for Defendants*
16 *Samsung Electronics Co., Ltd.,*
17 *Samsung Semiconductor, Inc. and*
18 *Samsung Electronics America, Inc.*

19 Dated: April 27, 2011

20 By: /s/ Rodney J. Ganske
21 Michael P. Kenny, Esq.
22 mike.kenny@alston.com
23 Debra D. Bernstein, Esq.
24 debra.bernstein@alston.com
25 Rodney J. Ganske, Esq.
26 rod.ganske@alston.com
27 **ALSTON & BIRD LLP**
28 1201 West Peachtree Street
Atlanta, Georgia 30309-3424
Tel: (404) 881-7000
Facsimile: (404) 881-7777

Steven D. Hemminger (SBN 110665)
steve.hemminger@alston.com
ALSTON & BIRD LLP
275 Middlefield Road
Suite 150
Menlo Park, CA 94025-4004
Telephone: (650) 838-2000
Facsimile: (650) 838-2001
Facsimile: (650) 838-2001

*Attorneys for Plaintiffs Dell Inc. and Dell
Products L.P.*

1 Dated: April 27, 2011

By: /s/ Joshua C. Stokes

2 Joshua C. Stokes (SBN 121539)
3 Jason C. Murray (SBN 169806)
4 Joshua C. Stokes (SBN 220214)
5 CROWELL & MORING LLP
6 515 South Flower St., 40th Floor
7 Los Angeles, CA 90071
8 Telephone: 213-443-5582
9 Facsimile: 213-622-2690

10 Jeffrey H. Howard (*pro hac vice*)
11 Jerome A. Murphy (*pro hac vice*)
12 CROWELL & MORING LLP
13 1001 Pennsylvania Avenue, N.W.
14 Washington, D.C. 20004
15 Telephone: 202-624-2500
16 Facsimile: 202-628-5116

17 *Attorneys for Plaintiff Motorola, Inc.*

18 **Attestation:** The filer of this document attests that the concurrence of the signatories
19 thereto has been obtained.

20 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

21 Dated: 5/2/11, 2011



22 _____
23 Honorable Susan J. Illston
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