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10
 11 **UNITED STATES DISTRICT COURT**
 12 **NORTHERN DISTRICT OF CALIFORNIA**
 13

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

Master File No. M07-1827 SI

MDL No. 1827

15 This Document Relates To: Case No. 09-5840

**STIPULATION OF EXTENSION OF TIME
 TO RESPOND TO COMPLAINT, WAIVER
 OF SERVICE, AND ~~PROPOSED~~ ORDER**

16 MOTOROLA MOBILITY, INC.,
 17
 18 Plaintiff,

19 v.

20 AU OPTRONICS CORPORATION, *et al.*,
 21 Defendants.

1 Whereas, plaintiff Motorola Mobility, Inc. (“Motorola”) filed a third amended
2 complaint (“TAC”) in the above-captioned case against defendants AU Optronics Corporation,
3 AU Optronics Corporation America, Chi Mei Corporation, Chimei Innolux Corporation, Chi Mei
4 Optoelectronics USA, Inc., CMO Japan Co. Ltd., Chunghwa Picture Tubes Ltd., Epson
5 Electronics America, Inc., Epson Imaging Devices Corporation, HannStar Display Corporation,
6 LG Display Co. Ltd., LG Display America, Inc., Nexgen Mediatech, Inc., Nexgen Mediatech
7 USA, Inc., Samsung Electronics America, Inc., Samsung Electronics Co., Ltd., Samsung
8 Semiconductor, Inc., Sharp Corporation, Sharp Electronics Corporation, Tatung Company of
9 America, Inc., Toshiba America Electronic Components, Inc., Toshiba Corporation, Toshiba
10 Mobile Display Co., Ltd., Toshiba America Information Systems, Inc., and newly named
11 defendants Philips Electronics North America Corporation, Samsung SDI Co. Ltd., Samsung
12 SDI America, Inc., and Sanyo Consumer Electronics Co. Ltd. (the “Newly Named Defendants,”
13 and together, with the other defendants, the “Stipulating Defendants”) on July 22, 2011;

14 Whereas, Motorola wishes to avoid the burden and expense of serving process on
15 the Newly Named Defendants; and

16 Whereas, the Stipulating Defendants wish to confirm a date certain for their time
17 to respond to the TAC.

18 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and
19 among the undersigned counsel, on behalf of their respective clients, Motorola, on the one hand,
20 and the Stipulating Defendants, on the other hand, as follows:

21 1. The Newly Named Defendants waive service of the TAC under Federal
22 Rule of Civil Procedure 4(d). This stipulation does not constitute a waiver by the Newly Named
23 Defendants of any other substantive or procedural defense, including but not limited to the
24 defenses of lack of personal or subject matter jurisdiction and improper venue.

1 2. The deadline for all Stipulating Defendants, other than the Newly Named
2 Defendants, to move to dismiss, answer, or otherwise respond to the TAC will be August 15,
3 2011.

4 3. The deadline for the Newly Named Defendants to move to dismiss,
5 answer, or otherwise respond to the TAC will be September 12, 2011.

6
7 DATED: August 10, 2011

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*Counsel for Defendants Sharp Corporation and Sharp
Electronics Corporation*

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Inc., Toshiba Corporation, and Toshiba Mobile Display
Co., Ltd.*

1 **IT IS SO ORDERED.**

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3 Dated: 8/11, 2011

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Susan Illston, United States District Judge

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1 I, Brendan P. Cullen, am the ECF User whose ID and password are being used to file this
2 Stipulation of Extension of Time to Respond to Complaint, Waiver of Service, and [Proposed] Order. In
3 compliance with General Order 45, X.B., I hereby attest that the signed parties have concurred in this
4 filing.

5
6 Dated: August 10, 2011

/s/ Brendan P. Cullen
Brendan P. Cullen