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7 Attorneys for Defendants  
 Epson Imaging Devices Corporation and  
 8 Epson Electronics America, Inc.

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UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

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

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

This Document Relates to: No. 09-5840

MOTOROLA MOBILITY, INC.

Plaintiffs,

v.

AU OPTRONICS CORPORATION, et al.

Defendants.

**STIPULATION AND  
 [PROPOSED] ORDER  
 PERMITTING DEPOSITIONS  
 BEYOND FACT DISCOVERY  
 CUTOFF DATE**

1 Plaintiff Motorola Mobility, Inc. (“Motorola”) and Defendants Epson Imaging Devices  
2 Corporation and Epson Electronics America, Inc. (collectively “Epson”), parties to the above-  
3 entitled action (collectively, “Parties”), hereby stipulate as follows:

4 WHEREAS, the Parties have met and conferred to discuss scheduling the deposition of  
5 Motorola’s employees Tracy Guo, C.F. Cheng, and C.M. Lai, and Epson employee Hiroyuki  
6 Matsuura;

7 WHEREAS, the aforementioned individuals are not available for deposition before the  
8 fact discovery cutoff date of December 8, 2011;

9 NOW, THEREFORE, the Parties, through their undersigned respective counsel, stipulate  
10 and request that the Court order as follows:

11 1. That the fact discovery cutoff date of December 8, 2011 be extended for the sole  
12 purpose of the aforementioned, proposed depositions;

13 2. That Defendants may take the deposition of Ms. Guo on December 14-15, Mr.  
14 Cheng on December 20, and Mr. Lai on December 21;

15 3. That Direct Action Plaintiffs may take the deposition of Mr. Matsuura at a date to  
16 be determined outside the fact discovery cutoff; and

17 4. That the Parties continue to work in good faith with regards to scheduling  
18 additional depositions of their respective employees after the close of fact discovery. To allow  
19 sufficient time for the Parties to coordinate with respect to any remaining depositions, the  
20 deadline to move to compel further depositions of Motorola or Epson witnesses shall be extended  
21 to January 31, 2012.

22 Dated: December 9, 2011

MELVIN R. GOLDMAN  
STEPHEN P. FRECCERO  
DEREK F. FORAN  
MORRISON & FOERSTER LLP

23 By:           /s/ Derek F. Foran            
24 DEREK F. FORAN

25 Attorneys for Defendants  
26 Epson Imaging Devices Corporation  
27 and Epson Electronics America, Inc.  
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Dated: December 9, 2011

JEFFREY H. HOWARD  
JEROME A. MURPHY  
JASON C. MURRAY  
JOSHUA C. STOKES  
CROWELL & MORING LLP

By:           /s/ Joshua C. Stokes            
          JOSHUA C. STOKES

*Attorneys for Plaintiff  
Motorola Mobility, Inc.*

**Attestation:** The filer of this document attests that concurrence in the filing of this document has been obtained from the other signatory.


By:           /s/ Derek F. Foran            
          Derek F. Foran

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**PROPOSED ORDER**

Under the Parties' stipulation set forth above, IT IS SO ORDERED.

Dated: 12/16/11

  
\_\_\_\_\_  
Hon. Susan Illston  
United States District Judge