

1 Jeffrey H. Howard (*pro hac vice*)  
 2 Jerome A. Murphy (*pro hac vice*)  
 3 CROWELL & MORING LLP  
 4 1001 Pennsylvania Avenue, N.W.  
 5 Washington, D.C. 20004  
 Telephone: 202-624-2500  
 Facsimile: 202-628-5116  
 Email: [jhoward@crowell.com](mailto:jhoward@crowell.com)  
[jmurphy@crowell.com](mailto:jmurphy@crowell.com)

6 Jason C. Murray (CA Bar No. 169806)  
 7 Joshua C. Stokes (CA Bar No. 220214)  
 8 CROWELL & MORING LLP  
 9 515 South Flower St., 40th Floor  
 Los Angeles, CA 90071  
 Telephone: 213-622-4750  
 Facsimile: 213-622-2690  
 Email: [jmurray@crowell.com](mailto:jmurray@crowell.com)  
[jstokes@crowell.com](mailto:jstokes@crowell.com)

11 *Counsel for Plaintiff Motorola Mobility, Inc. and*  
 12 *Target Corp, et al.*

13 UNITED STATES DISTRICT COURT  
 14 NORTHERN DISTRICT OF CALIFORNIA  
 15 SAN FRANCISCO DIVISION

17 In re TFT-LCD (FLAT PANEL) ANTITRUST  
 18 LITIGATION

Master Docket No. 07-m-1827 SI

19 This Document Relates To:

**STIPULATION AND [PROPOSED]  
 ORDER EXTENDING PLAINTIFFS'  
 TIME TO MOVE TO COMPEL AS  
 TO CERTAIN DISCOVERY**

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

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

1 Defendant Philips Electronics North America Corporation (“PENAC”) and Plaintiffs  
2 Motorola Mobility, Inc. (“Motorola”); Target Corp.; Sears Roebuck and Co.; Kmart Corp.; Old  
3 Comp Inc.; Good Guys, Inc.; RadioShack Corp.; Newegg Inc. (collectively, “Plaintiffs”),  
4 stipulate as follows:

5 WHEREAS Plaintiffs served a Joint Set of Interrogatories and a Joint Set of Requests for  
6 Production of Documents on PENAC and certain other defendants on November 2, 2011 (the  
7 “Discovery”);

8 WHEREAS PENAC provided Responses and Objections to the Discovery on December  
9 2, 2011;

10 WHEREAS the parties have begun to meet and confer regarding PENAC’s Responses and  
11 Objections to the Discovery, and require additional time to complete the meet and confer process;

12 WHEREAS PENAC may wish to supplement its Responses and Objections upon  
13 completing the meet and confer process;

14 WHEREAS PENAC is currently reviewing Plaintiffs’ responses to discovery served by  
15 PENAC;

16 WHEREAS the current deadline to file motions to compel in the above-captioned cases is  
17 December 15, 2011, and the parties have agreed to provide each other with additional time to  
18 move to compel further responses;

19 THEREFORE, PENAC and Plaintiffs, by their respective undersigned counsel, stipulate  
20 and agree as follows:

21 The deadline for PENAC and Plaintiffs to move to compel further responses shall be  
22 extended to January 31, 2012.

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1 Dated: December 15, 2011

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3 /s/ Joshua C. Stokes

4 Jason C. Murray (CA Bar No. 169806)  
5 Joshua C. Stokes (CA Bar No. 220214)  
6 CROWELL & MORING LLP  
7 515 South Flower St., 40th Floor  
8 Los Angeles, CA 90071  
9 Telephone: 213-622-4750  
10 Facsimile: 213-622-2690  
11 Email: jmurray@crowell.com  
12 jstokes@crowell.com

13 Jeffrey H. Howard (*pro hac vice*)  
14 Jerome A. Murphy (*pro hac vice*)  
15 CROWELL & MORING LLP  
16 1001 Pennsylvania Avenue, N.W.  
17 Washington, D.C. 20004  
18 Telephone: 202-624-2500  
19 Facsimile: 202-628-5116  
20 Email: jhoward@crowell.com  
21 jmurphy@crowell.com

22 Kenneth L. Adams (*pro hac vice*)  
23 R. Bruce Holcomb (*pro hac vice*)  
24 Christopher T. Leonardo (*pro hac vice*)  
25 ADAMS HOLCOMB LLP  
26 1875 Eye Street NW  
27 Washington, DC 20006  
28 Telephone: 202-580-8822  
Facsimile: 202-580-8821  
Email: adams@adamsholcomb.com  
holcomb@adamsholcomb.com  
leonardo@adamsholcomb.com

*Counsel for Plaintiff Motorola Mobility, Inc., Target Corporation; Sears, Roebuck and Co.; Kmart Corporation; Old Comp Inc.; Good Guys, Inc.; RadioShack Corporation; and Newegg Inc.*

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/s/ Brendan P. Cullen  
Brendan P. Cullen (SBN 194057)  
SULLIVAN & CROMWELL LLP  
1870 Embarcadero Road  
Palo Alto, California 94303  
Telephone: (650) 461-5600  
Facsimile: (650) 461-5700  
cullenb@sullcrom.com

Garrard R. Beeney (NY Reg. No. 1656172)  
SULLIVAN & CROMWELL LLP  
125 Broad Street  
New York, New York 10004-2498  
Telephone: (212) 558-4000  
Facsimile: (212) 558-3588  
beeneyg@sullcrom.com

*Counsel for Defendant Philips Electronics North  
America Corporation*

**IT IS SO ORDERED.**

Dated: 12/16, 2011

  
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Hon. Susan Illston, United States District Judge

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