

4449

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

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

11 *Counsel for Plaintiff Motorola Mobility, Inc,*
 [Additional counsel listed on signature page]

12
 13 UNITED STATES DISTRICT COURT
 14 NORTHERN DISTRICT OF CALIFORNIA
 15 SAN FRANCISCO DIVISION

17 In re TFT-LCD (FLAT PANEL) ANTITRUST
 LITIGATION
 18
 19 This Document Relates To:
 20 *Motorola Mobility, Inc. v. AU Optronics
 Corporation, et al., C 09-5840 SI*

Master Docket No. 07-m-1827 SI

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

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

1 The undersigned Defendants in the above captioned-action and Plaintiff Motorola
2 Mobility, Inc. (“Motorola”) stipulate as follows:

3 WHEREAS various Defendants have served discovery on Motorola prior to October 31,
4 2011 seeking discovery of the basis for Motorola’s contentions in its complaint regarding
5 Defendants’ participation in a conspiracy to affect the price of LCDs, to which Motorola has
6 served responses and objections (“Contention Discovery”), and Defendants also served
7 discovery requests related to other subjects, to which Motorola has served responses and
8 objections;

9 WHEREAS the parties have been in negotiations regarding an extension of time for
10 Motorola to supplement certain responses to the previously served discovery and to update its
11 chart of conspiracy evidence it served on May 24, 2011 as “Attachment A” to its responses to
12 certain discovery requests;

13 WHEREAS Motorola may serve supplemental responses to discovery requests served by
14 any Defendant not joining this Stipulation and this Stipulation is without prejudice to (a)
15 Motorola’s ability to do so; or (b) the positions of any party not joining this stipulation with
16 respect to any such supplemental responses;

17 NOW THEREFORE, the parties stipulate and agree as follows:

18 1. Motorola will serve an updated Attachment A to include any supplemental
19 responses to the Contention Discovery by January 30, 2012 and the undersigned Defendants
20 shall have until March 1, 2012 to file motions to compel with respect to any supplemented
21 responses; and

22 2. Motorola will serve any supplemental responses it intends to provide related to
23 subjects other than the Contention Discovery by January 20, 2012, and undersigned Defendants
24 shall have until February 10, 2012 to file motions to compel with respect to any supplemented
25 responses.

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1 Dated: December 28, 2011

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/s/ Joshua C. Stokes

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

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5

6

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

9

10

11

12

13

14

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

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19

Counsel for Plaintiff Motorola Mobility, Inc.

20

21 Dated: December 28, 2011

By: /s/ Derek F. Foran

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MORRISON & FOERSTER LLP
Melvin Goldman
Stephen P. Freccero
Derek F. Foran
425 Market Street
San Francisco, California 94105-2482
Tel: (415) 268-7000
Fax: (415) 268-7522

27

*Counsel for Defendants Epson Imaging
Devices Corporation and Epson
Electronics America, Inc.*

28

1 Dated: December 28, 2011

By: /s/ Carl L. Blumenstein

2

NOSSAMAN LLP
Christopher A. Nedeau, Esq.
Carl L. Blumenstein, Esq.
Allison M. Dibley, Esq.
James A. Nickovich, Esq.
50 California Street, 34th Floor
San Francisco, CA 94111
Tel: (415) 398-3600
Fax: (415) 398-2438

3

4

5

6

7

*Counsel for Defendants AU Optronics
Corporation and AU Optronics
Corporation America*

8

9

10 Dated: December 28, 2011

By: /s/ Harrison J. Frahn IV

11

SIMPSON THACHER
& BARTLETT LLP
Harrison J. Frahn IV, Esq. (SBN 206822)
Jason M. Bussey, Esq. (SBN 227185)
2550 Hanover Street
Palo Alto, CA 94304
Telephone: (650) 251-5000
Facsimile: (650) 251-5002
hfrahn@stblaw.com
jbussey@stblaw.com

12

13

14

15

16

*Counsel for Defendants Chi Mei
Corporation, Chimei Innolux Corporation,
CMO Japan Co., Ltd., Chi Mei
Optoelectronics USA Inc., Nexgen
Mediatech Inc., and Nexgen Mediatech
USA Inc.*

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1 Dated: December 28, 2011

By: /s/ Ramona Emerson

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K&L GATES LLP
Hugh F. Bangasser, Esq.
Ramona Emerson, Esq.
925 Fourth Avenue, Suite 2900
Seattle, WA 98104-1158
Tel: (206) 623-7580
Fax: (206) 623-7022

Counsel for Defendants Hannstar Display Corporation

8 Dated: December 28, 2011

By: /s/ Michael R. Lazerwitz

CLEARY GOTTLIEB STEEN &
HAMILTON LLP
Michael R. Lazerwitz, Esq.
Lee F. Berger, Esq.
Kelsey W. Shannon, Esq.
2000 Pennsylvania Avenue N.W.
Washington, DC 20006
Tel: (202) 974-1500
Fax: (202) 974-1999

Counsel for Defendants LG Display America, Inc. and LG Display Co., Ltd.

16 Dated: December 28, 2011

By: /s/ Brendan P. Cullen

SULLIVAN & CROMWELL LLP
Garrard R. Beeney, Esq.
Theodore Edelman, Esq.
125 Broad Street
New York, NY 10004-2498
Tel: (212) 558-4000
Fax: (212) 558-3588

Brendan P. Cullen, Esq.
Shawn J Lichaa, Esq.
1870 Embarcadero Road
Palo Alto, CA 94303
Tel: (650)461-5600
Fax: (650) 461-5745

Counsel for Defendants Philips Electronics North America Corporation

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Dated: December 28, 2011

By: /s/ Jeffrey Davidson

COVINGTON & BURLING LLP
Timothy C. Hester, Esq.
Robert D. Wick, Esq.
Derek Ludwin, Esq.
Jeffrey Davidson, Esq.
One Front Street
San Francisco, CA 94111
Tel: (415) 591-6000
Fax: (415) 591-6091

*Counsel for Defendants Samsung
Electronics Co., Ltd., Samsung
Semiconductor, Inc., and Samsung
Electronics America, Inc.*

Dated: December 28, 2011

By: /s/ Michael W. Scarborough

SHEPPARD MULLIN RICHTER &
HAMPTON LLP
Gary L. Halling
James L. McGinnis
Michael W. Scarborough
Mona Solouki
Tyler M. Cunningham
Four Embarcadero Center, 17th Floor
San Francisco, CA 94111-4106
Tel: (415) 434-9100
Fax: (415) 434-3947

*Counsel for Defendants Samsung SDI Co.,
Ltd. and Samsung SDI America, Inc.*

Dated: December 28, 2011

By: /s/ Alison A. Davis

DAVIS WRIGHT TREMAINE LLP
Allison A. Davis, Esq.
505 Montgomery Street, Suite 800
San Francisco, CA 94111
Tel: (415) 276-6500
Fax: (415) 276-6599

*Counsel for Defendants Sanyo Consumer
Electronics Co., Ltd.*

1 Dated: December 28, 2011

By: /s/ Colin West

2
3 BINGHAM MCCUTCHEN LLP
Colin West, Esq.
4 Three Embarcadero Center
San Francisco, CA 94111-4067
5 Tel: (415) 393-2000
Fax: (415) 393-2286

6 *Counsel for Defendants Sharp Corporation
and Sharp Electronics Corporation*

7
8 Dated: December 28, 2011

By: /s/ John H. Chung

9 WHITE & CASE LLP
10 Christopher M. Curran (*pro hac vice*)
John H. Chung (*pro hac vice*)
11 Martin M. Toto (*pro hac vice*)
Kristen J. McAhren (*pro hac vice*)
12 1155 Avenue of the Americas
New York, NY 10036
13 Tel: (212) 819-8200
Fax: (212) 354-8113

14 *Attorneys for Toshiba Corporation,
15 Toshiba Mobile Display Co., Ltd., Toshiba
America Electronic Components, Inc. and
16 Toshiba America Information Systems, Inc.*

17 **Pursuant to General Order 45, Part X-B, the filer attests that concurrence in**
18 **the filing of this document has been obtained from the other signatories.**

19
20 /s/ Joshua C. Stokes

21 **Joshua Stokes**

22 **IT IS SO ORDERED.**

23
24 Dated: _____, 2011

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26 Hon. Susan Illston, United States District Judge