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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

In re TFT-LCD (FLAT PANEL) ANTITRUST
 LITIGATION

This Document Relates To:

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

*Target Corporation, et al., v. AU Optronics
 Corporation, et al., 3:10-cv-4945 SI*

Master Docket No. 07-m-1827 SI

**THIRD STIPULATION AND
~~PROPOSED~~ ORDER REGARDING
 RULE 30(B)(6) DEPOSITION OF
 PHILIPS ELECTRONICS NORTH
 AMERICA CORPORATION AND
 FACT DISCOVERY CUT-OFF**

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

4 WHEREAS on November 2, 2011, Plaintiffs initially served a notice of deposition of
5 PENAC pursuant to Federal Rule of Civil Procedure 30(b)(6) ("November 2, 2011 30(b)(6)
6 Notice");

7 WHEREAS the Court previously extended the time for Plaintiffs to take the deposition of
8 PENAC to April 30, 2012;

9 WHEREAS PENAC is still diligently working to produce documents to Plaintiffs, and
10 expects to complete its production in March 2012;

11 WHEREAS Plaintiffs and PENAC have met and conferred regarding scheduling the Rule
12 30(b)(6) deposition of PENAC;

13 WHEREAS the parties agree that the discovery cutoff should be further extended in order
14 to permit PENAC time to complete its production and Plaintiffs time to review the produced
15 documents before the deposition; and

16 THEREFORE, PENAC and Plaintiffs, by their respective, undersigned counsel, stipulate
17 and agree as follows:

18 1. The fact discovery cutoff date of December 8, 2011 set forth in the Order
19 Modifying Pretrial Schedule for "Track One" Direct Action Plaintiff and State Attorney General
20 Cases (MDL Dkt. No. 3110) is extended up to and including June 1, 2012, solely as to the
21 deposition of PENAC.

22 2. PENAC shall retain its right to object to any subsequent notice and the topics
23 therein.

24 3. If disputes arise at the deposition, Plaintiffs will have five court days to move to
25 compel further responses.

26 4. Unless expressly provided herein, nothing in this Stipulation and Order is intended

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1 to modify any other Order of the Court or the Special Master, nor does this order prevent any
2 party from seeking further modifications to such orders.

3 Dated: March 22, 2012

4 /s/ Nathaniel J. Wood

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/s/ Brendan P. Cullen

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

IT IS SO ORDERED.

Dated: 3/22, 2012



Susan Illston, United States District Judge

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