1	MELVIN R. GOLDMAN (CA SBN 34097)			
2	MGoldman@mofo.com STEPHEN P. FRECCERO (CA SBN 131093)			
3	SFreccero@mofo.com DEREK F. FORAN (CA SBN 224569)			
4	DForan@mofo.com MORRISON & FOERSTER LLP 425 Market Street			
5	San Francisco, California 94105-2482 Telephone: 415.268.7000			
6	Facsimile: 415.268.7522			
7 8	Attorneys for Defendants EPSON IMAGING DEVICES CORPORATION and EPSON ELECTRONICS AMERICA, INC.			
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11	UNITED STATES DISTRICT COURT			
12	NORTHERN DISTRICT OF CALIFORNIA			
13	SAN FRANCISCO DIVISION			
14				
15 16	IN RE TFT-LCD (FLAT PANEL) ANTITRUST LITIGATION	Master File No.: 3:07-MD-1827-SI Case No. 09-cv-5840-SI MDL No. 1827		
17	This Document Relates to:	STIPULATION AND [PROPOSED] ORDER ON BRIEFING SCHEDULE		
18	Motorola Mobility, Inc. v. AU Optronics	FOR SUMMARY JUDGMENT MOTION ADDRESSING		
19	Corporation, et al., C 09-5840 SI	PLAINTIFF'S CLAIMS FOR INJURIES IN FOREIGN MARKETS		
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1	The undersigned counsel, on behalf of Plaintiff Motorola Mobility, Inc. ("Motorola") and
2	defendants AU Optronics Corporation and AU Optronics Corporation America, Chi Mei
3	Corporation, Chimei Innolux Corporation, Chi Mei Optoelectronics USA, Inc., CMO Japan Co.,
4	Ltd., Nexgen Mediatech, Inc. and Nexgen Mediatech USA, Inc., Chunghwa Picture Tubes, Ltd.
5	and Tatung Company of America, Epson Imaging Devices Corporation and Epson Electronics
6	America, Inc., HannStar Display Corporation, LG Display America, Inc. and LG Display Co.,
7	Ltd., Philips Electronics North America Corporation, Samsung Electronics Co., Ltd., Samsung
8	Semiconductor, Inc., and Samsung Electronics America, Inc., Samsung SDI Co., Ltd. and
9	Samsung SDI America, Inc., Sanyo Consumer Electronics Co., Ltd., Sharp Corporation and
10	Sharp Electronics Corporation, and Toshiba Corporation, Toshiba Mobile Display Co., Ltd.,
11	Toshiba America Electronic Components, Inc. and Toshiba America Information Systems, Inc.
12	("Defendants"), parties to the above-entitled action, hereby stipulate as follows:
13	WHEREAS Defendants will file a Joint Motion for Summary Judgment addressing
14	Plaintiff's claims for injuries in foreign markets under the Foreign Trade Antitrust Improvement
15	Act (the "Motion");
16	WHEREAS the Motion involves issues of fact and law that cannot be adequately
17	presented in 25 pages;
18	WHEREAS Motorola and Defendants have agreed that an orderly schedule of the briefing
19	would be most efficient for the Court and the Parties;
20	THEREFORE the Parties agree as follows:
21	1. Defendants shall submit the Motion by April 4, 2012. The page limit for the
22	Memorandum in support of the Motion shall be 35 pages.
23	2. Motorola shall submit its Opposition to the Motion by May 18, 2012. The page
24	limit for the Opposition shall be 45 pages.
25	3. Defendants shall submit a Reply by June 15, 2012. The page limit for the Reply
26	shall be 30 pages.
27	4. The Motion shall be heard on July 13, 2012, or at such time as the Court may

Joint Stipulation and [Proposed] Order Re: Briefing Schedule Case No. 09-cv-5840-SI ; 3:07-MD-1827-SI sf-3120328

choose.

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1 2	Dated: March 27, 2012	MELVIN R. GOLDMAN STEPHEN P. FRECCERO DEREK F. FORAN
		MORRISON & FOERSTER LLP
3		By: /s/ Derek F. Foran
4		DEREK F. FORAN
5		Attorneys for Defendants Ensen Imaging Devices Comparation
6		Epson Imaging Devices Corporation and Epson Electronics America, Inc.
7		Also filed on behalf of AU Optronics
8		Corporation and AU Optronics Corporation America, Chi Mei
9		Corporation, Chimei Innolux Corporation, Chi Mei Optoelectronics USA, Inc., CMO
10		Japan Co., Ltd., Nexgen Mediatech, Inc. and Nexgen Mediatech USA, Inc.,
11		Chunghwa Picture Tubes, Ltd. and Tatung Company of America, Inc., HannStar
		Display Corporation, LG Display
12		America, Inc. and LG Display Co., Ltd., Philips Electronics North America
13		Corporation, Samsung Electronics Co., Ltd., Samsung Semiconductor, Inc., and
14		Samsung Electronics America, Inc.,
15		Samsung SDI Co., Ltd. and Samsung SDI America, Inc., and Sanyo Consumer
16		Electronics Co., Ltd., Sharp Corporation and Sharp Electronics Corporation, and
17		Toshiba Corporation, Toshiba Mobile Display Co., Ltd., Toshiba America
18		Electronic Components, Inc. and Toshiba America Information Systems, Inc.
19		g
20		JEFFREY H. HOWARD
21		JEROME A. MURPHY JASON C. MURRAY
22		JOSHUA C. STOKES CROWELL & MORING LLP
23		
24		By: /s/ Jason C. Murray
25		JASON C. MURRAY
26		Attorneys for Plaintiff
		Motorola Mobility, Inc.
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28	_	

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1	Attestation: I, Derek F. Foran, attest that concurrence in the filing of this document has been			
2	obtained from co-signatory Jason C. Murray.			
3	Dated: March 27, 2012 By:/s/ Derek F. Foran			
4	Dated: March 27, 2012 By: /s/ Derek F. Foran			
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6				
7	[PROPOSED ORDER]			
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9	Pursuant to the Parties' stipulation set forth above, IT IS SO ORDERED.			
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11	Super 2/27/12			
12	Dated: 3/27/12 Hon. Susan Illston	_		
13	United States District Judge			
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Joint Stipulation And [Proposed] Order Re: Briefing Schedule Case No. 09-cv-5840-SI ; $3\!:\!07\text{-MD}\text{-}1827\text{-SI}$ sf-3120328

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