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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
 Case No. 09-cv-5840-SI
 MDL No. 1827

This Document Relates to:

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

**STIPULATION AND [PROPOSED]
 ORDER ON BRIEFING SCHEDULE
 FOR SUMMARY JUDGMENT
 MOTION ADDRESSING
 PLAINTIFF'S CLAIMS FOR
 INJURIES IN FOREIGN MARKETS**

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
28 choose.

