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Attorneys for Defendant Mitsui & Co. (Taiwan), Ltd.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE: TFT-LCD (FLAT PANEL)  
ANTITRUST LITIGATION

Case No. 3:10-cv-00117-SI

Master File No. 3:07-md-1827-SI

This Document Relates to Individual Case No.  
3:10-cv-00117-SI

MDL No. 1827

ELECTROGRAPH SYSTEMS, INC., et al.,

Plaintiffs,

v.

EPSON IMAGING DEVICES  
CORPORATION, et al.,

Defendant.

**STIPULATION AND [PROPOSED]  
ORDER PERMITTING 30(b)(6)  
DEPOSITION OF MITSUI & CO.  
(TAIWAN), LTD. BEYOND  
DISCOVERY CUTOFF DATE**

1 Plaintiffs Electrograph Systems, Inc. and Electrograph Technologies, Corp. (together,  
2 “Plaintiffs”), and Defendant Mitsui & Co. (Taiwan), Ltd. (“Mitsui”), parties to the above-titled  
3 action (together, the “Parties”), hereby stipulate as follows:

4 WHEREAS, the Plaintiffs issued a Notice of Deposition Pursuant to Fed. R. Civ. P.  
5 30(b)(6) to Mitsui Taiwan on November 9, 2011.

6 WHEREAS, Mitsui Taiwan issued written objections to the Notice of Deposition on  
7 November 23, 2011.

8 WHEREAS, the Parties have met and conferred to discuss the location and scheduling of  
9 the noticed 30(b)(6) deposition.

10 WHEREAS, the Parties were unable to find a mutually agreeable date for the deposition  
11 prior to the discovery cutoff of December 8, 2011.

12 WHEREAS, Mitsui Taiwan has agreed to make its 30(b)(6) witness available after the  
13 discovery cutoff date as set forth below.

14 THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among the  
15 undersigned counsel, on behalf of their respective clients, Plaintiffs, on the one hand, and Mitsui  
16 Taiwan, on the other hand, that:

17 1. The discovery cutoff date of December 8, 2011 be extended for the sole purpose of  
18 the aforementioned noticed deposition, but not for any other discovery; and

19 2. That the Plaintiffs take the 30(b)(6) deposition of Mitsui Taiwan on a mutually  
20 agreed date in January 2012.

1 Dated: November 29, 2011

2 /s/ Michael E. Mumford

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*Inc. and Electrograph Technologies, Corp.*

Attestation: The filer of this document attests that the concurrence of the other signatories thereto has been obtained.

**[PROPOSED] ORDER**

IT IS SO ORDERED.

DATED this 30<sup>th</sup> day of Nov., 2011.

By:   
Hon. SUSAN ILLSTON