

1 Richard S. Taffet (*pro hac vice*)
 Jon R. Roellke (*pro hac vice*)
 2 Colin C. West (SBN 184095)
 Kristen A. Palumbo (SBN 215857)
 3 BINGHAM MCCUTCHEN LLP
 Three Embarcadero Center
 4 San Francisco, CA 94111-4067
 (415) 393-2000 (telephone)
 5 (415) 393-2286 (facsimile)
 colin.west@bingham.com

6 *Attorneys for Defendants*
 7 Sharp Corporation
 Sharp Electronics Corporation

8 [additional counsel and parties listed in signature block]
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10 UNITED STATES DISTRICT COURT
 11 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 12 (SAN FRANCISCO DIVISION)

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

MASTER CASE NO. 3:07-md-1827 SI, MQ
 MDL NO. 1827

16 This Document Relates To Individual Case No.
 3:10-cv-01064 SI

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 DELL INC. and DELL PRODUCTS L.P.,

Individual Case No. 3:10-cv-01064 SI

19 Plaintiffs,

**STIPULATION AND [~~PROPOSED~~]
 ORDER REGARDING EXTENSION OF
 TIME TO RESPOND TO DISCOVERY
 REQUESTS**

20 v.

21 SHARP CORPORATION, et. al.

22 Defendants.
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 25 WHEREAS, Defendants Toshiba America Electronic Components, Inc., Toshiba America
 26 Information Systems, Inc., Toshiba Corporation, and Toshiba Mobile Display Co., Ltd. (collectively,
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1 “Toshiba”) served discovery requests on Plaintiffs Dell Inc. and Dell Products L.P. (collectively,
2 “Dell”) on behalf of all the *Dell* defendants on November 4, 2011;

3 WHEREAS, Defendants AU Optronics Corporation and AU Optronics Corporation America,
4 Inc. (collectively, “AUO”) served discovery requests on Dell on behalf of AUO on September 6,
5 2011 and November 4, 2011;

6 WHEREAS, Defendants Epson Imaging Devices Corporation and Epson Electronics
7 America, Inc. (collectively, “Epson”) served discovery requests on Dell on behalf of Epson on
8 November 4, 2011;

9 WHEREAS, Dell served discovery requests on Defendants Sharp Corporation and Sharp
10 Electronics Corporation (collectively, “Sharp”), AUO, HannStar Display Corporation (“HannStar”),
11 Chi Mei Innolux Corporation, Chi Mei Optoelectronics Corporation, Chi Mei Optoelectronics USA,
12 Inc., CMO Japan Co., Ltd., Nexgen Mediatech, Inc., and Nexgen Mediatech USA, Inc. (collectively,
13 “CMO”) and Toshiba between October 19, 2011, and November 4, 2011;

14 WHEREAS, HannStar served on Dell a Second Set of Document Requests on October 27,
15 2011, and Sharp served on Dell a First Set of Interrogatories on October 4, 2011, and AUO served a
16 deposition notice on Dell pursuant to Federal Rule of Civil Procedure 30(b)(6) on November 22,
17 2011, and with respect to such discovery the parties are currently engaged in meet and confer efforts,
18 or expect to engage in meet and confer efforts, to resolve issues related to Dell’s objections and
19 responses thereto;

20 WHEREAS, the parties have negotiated extensions of time concerning the discovery requests
21 set forth above and the responses thereto;

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

23 The deadline for responding to the aforementioned discovery requests served on Dell by
24 AUO, and the Requests for Admissions and Interrogatories served by Toshiba on Dell, on November
25 4, 2011, is extended to February 7, 2012;

26 The deadline for responding to the discovery served by Epson on Dell on November 4, 2011,
27 is extended to January 13, 2012;

1 The deadline for responding to the Request for Production served by Toshiba on Dell on
2 November 4, 2011, is extended to January 9, 2012;

3 The deadline for responding to the discovery served by Dell on AUO on November 4, 2011,
4 is extended to February 6, 2012;

5 The deadline for responding to the discovery served by Dell on Toshiba on November 4,
6 2011, is extended to December 22, 2011;

7 The deadline for responding to the discovery served by Dell on HannStar on November 4,
8 2011, is extended to December 21, 2011;

9 The deadline for responding to the discovery served by Dell on CMO on November 4, 2011,
10 is extended to January 9, 2012;

11 The deadline for responding to the discovery served by Dell on Sharp on October 19, 2011 is
12 extended to January 9, 2012;

13 The Rule 30(b)(6) deposition of Dell noticed for December 8, 2011, will not go forward on
14 that date, and the parties will meet and confer with respect to the deposition notice and Dell's
15 objections thereto;

16 Should the Rule 30(b)(6) deposition of Dell subsequently occur, either pursuant to the
17 agreement of the parties or pursuant to order of the Special Master or of the Court, that deposition
18 may proceed notwithstanding the presently existing December 8, 2011, discovery cut-off;

19 The deadline for the filing of any motions to compel with respect to the discovery identified
20 above, including discovery to which parties have already responded such as AUO's Responses to
21 Dell's and Motorola's First Set of Interrogatories, shall be extended to thirty (30) days after the date
22 on which the responses to that discovery are served;

23 The deadline for filing any motions to compel by AUO with respect to discovery requests
24 served on Dell on September 6, 2011 shall be extended to January 9, 2012, and

25 The deadline for the filing of any motions to compel with respect to the Document Requests
26 served on Dell by HannStar on October 27, 2011, and the Interrogatories served on Dell by Sharp on
27 October 4, 2011, shall be extended to January 9, 2012.

1 Other than the foregoing, the parties have not agreed to extend any other deadline or to
2 modify any other discovery limitation or deadline; the discovery cut-off in this case remains
3 December 8, 2011, for all other discovery.

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1 DATED: December 13, 2011

Respectfully submitted,

2 BINGHAM MCCUTCHEN LLP

3 By: /s/ Colin C. West

4 Colin C. West (SBN 184095)
5 BINGHAM MCCUTCHEN LLP
6 Three Embarcadero Center
7 San Francisco, CA 94111-4067
8 (415) 393-2000 (telephone)
9 (415) 393-2286 (facsimile)
10 colin.west@bingham.com

11 Richard S. Taffet (*pro hac vice*)
12 Kenneth I. Schacter (*pro hac vice*)
13 BINGHAM MCCUTCHEN LLP
14 399 Park Avenue
15 New York, NY 10022-4689
16 (212) 705-7000 (telephone)

17 Jon R. Roellke (*pro hac vice*)
18 BINGHAM MCCUTCHEN LLP
19 2020 K Street NW
20 Washington, DC 20006-1806
21 (202) 373-6000 (telephone)
22 jon.roellke@bingham.com

23 *Attorneys for Defendants Sharp Corporation and*
24 *Sharp Electronics Corp.*

1 DATED: December 13, 2011

By: /s/ Debra D. Bernstein

2 Michael P. Kenny, Esq.
3 Debra D. Bernstein, Esq.
4 Rodney J. Ganske, Esq.
5 ALSTON + BIRD LLP
6 1201 West Peachtree Street
7 Atlanta, Georgia 30309-3424
8 Tel: (404) 881-7000
9 Facsimile: (404) 881-7777
10 mike.kenny@alston.com
11 debra.bernstein@alston.com
12 rod.ganske@alston.com

13 Steven D. Hemminger (SBN 110665)
14 ALSTON + BIRD LLP
15 275 Middlefield Road, Suite 150
16 Menlo Park, CA 94025-4004
17 (650) 838-2000 (telephone)
18 (650) 838-2001 (facsimile)
19 steve.hemminger@alston.com

20 *Attorneys for Plaintiffs Dell Inc. and Dell Products*
21 *L.P.*

22 DATED: December 13, 2011

NOSSAMAN LLP

By: /s/ Christopher A. Nedeau

23 Christopher A. Nedeau (SBN 81297)
24 Carl L. Blumenstein (SBN 124158)
25 Allison M. Dibley (SBN 213104)
26 50 California Street, 34th Floor
27 San Francisco, California 94111
28 (415) 398-3600 / (415) 398-2438
cneadeau@nossaman.com
cblumenstein@nossaman.com
adibley@nossaman.com

Attorneys for Defendants AU Optronics
Corporation and AU Optronics Corporation
America

1 DATED: December 13, 2011

SIMPSON THACHER & BARTLETT LLP

2 By: /s/ Harrison J. Frahn IV

3 James G. Kreissman (SBN 206740)
4 Harrison J. Frahn IV (SBN 206822)
5 Jason M. Bussey (SBN 227185)
6 Michael R. Lizano (SBN 246222)
7 Arka D. Chatterjee (SBN 268546)
8 2550 Hanover Street
9 Palo Alto, CA 94304
10 Telephone: (650) 251-5000
11 Facsimile: (650) 251-5002
12 jkreissman@stblaw.com
13 hfrahn@stblaw.com
14 jbussey@stblaw.com
15 mlizano@stblaw.com
16 a chatterjee@stblaw.com

17 *Attorneys for Defendants Chimei Innolux*
18 *Corporation, Chi Mei Optoelectronics*
19 *Corporation, Chi Mei Optoelectronics USA, Inc.,*
20 *CMO Japan Co., Ltd., Nexgen Mediatech Inc., and*
21 *Nexgen Mediatech USA, Inc.*

22 DATED: December 13, 2011

MORRISON & FOERSTER LLP

23 By: /s/ Stephen P. Freccero

24 Melvin R. Goldman (SBN 34097)
25 Stephen P. Freccero (SBN 131093)
26 Derek F. Foran (SBN 224569)
27 425 Market Street
28 San Francisco, California 94105
(415) 268-7000 / (415) 268-7522
mgoldman@mofocom
sfreccero@mofocom
dforan@mofocom

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

1 DATED: December 13, 2011

K&L GATES LLP

2 By: /s/ Ramona M. Emerson

3 Hugh F. Bangasser (*pro hac vice*)
4 Ramona M. Emerson (*pro hac vice*)
5 Christopher M. Wyant (*pro hac vice*)
6 K&L GATES LLP
7 925 Fourth Avenue, Suite 2900
8 Seattle, WA 98004-1158
9 (206) 623-7580 (Phone)
10 (206) 623-7022 (Facsimile)
11 hugh.bangasser@klgates.com
12 ramona.emerson@klgates.com
13 chris.wyant@klgates.com

Attorneys for Defendant HannStar Display Corporation

10 DATED: December 13, 2011

WHITE & CASE LLP

11 By: /s/ John H. Chung

12 Christopher M. Curran (*pro hac vice*)
13 John H. Chung (*pro hac vice*)
14 Martin M. Toto (*pro hac vice*)
15 Kristen J. McAhren (*pro hac vice*)
16 1155 Avenue of the Americas
17 New York, NY 10036
18 (212) 819-8200 / (212) 354-8113
19 ccuran@whitecase.com
20 jchung@whitecase.com
21 mtoto@whitecase.com
22 kmcahren@whitecase.com

*Attorneys for Defendants Toshiba Corporation;
Toshiba Mobile Display Co., Ltd.; Toshiba
America Electronic Components, Inc.; and Toshiba
America Information Systems, Inc.*

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

3
4 By: /s/ Colin West
5 Colin C. West (SBN 184095)
6 BINGHAM MCCUTCHEN LLP
7 Three Embarcadero Center
8 San Francisco, CA 94111-4067
9 (415) 393-2000 (telephone)
10 (415) 393-2286 (facsimile)
11 colin.west@bingham.com
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1 **IT IS SO RECOMMENDED.**

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3 Dated: _____, 2011

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5 _____
6 Martin Quinn, Special Master

7 **IT IS SO ORDERED.**

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9 Dated: _____ 12/16 _____, 2011

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12 _____
13 Hon. Susan Illston, United States District Judge