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12 Attorneys for Defendants
 13 HITACHI, LTD., HITACHI DISPLAYS, LTD.,
 14 HITACHI ELECTRONIC DEVICES (USA), INC.

15 UNITED STATES DISTRICT COURT
 16 NORTHERN DISTRICT OF CALIFORNIA
 17 (SAN FRANCISCO DIVISION)

18 DELL INC. and DELL PRODUCTS L.P.,
 19
 20 Plaintiffs,
 21 v.
 22 SHARP CORPORATION; SHARP
 23 ELECTRONICS CORPORATION;
 24 HITACHI DISPLAYS, LTD.; HITACHI
 25 ELECTRONIC DEVICES (USA), INC.;
 26 HITACHI, LTD.; EPSON IMAGING
 27 DEVICES CORPORATION; EPSON
 28 ELECTRONICS AMERICA, INC.;
 HANNSTAR DISPLAY
 CORPORATION; TOSHIBA AMERICA
 ELECTRONIC COMPONENTS, INC.;
 TOSHIBA AMERICA INFORMATION
 SYSTEMS, INC.; TOSHIBA
 CORPORATION; and TOSHIBA
 MOBILE DISPLAY CO., LTD.,
 Defendants.

Case No. 3:10-CV-01064 SI
 MDL No. 1827

**STIPULATION AND [PROPOSED] ORDER
 REGARDING SCHEDULING**

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WHEREAS plaintiffs Dell Inc. and Dell Products L.P. (collectively, “Dell”) filed the above captioned lawsuit on March 12, 2010;

WHEREAS Dell filed a Notice of Related Case to *In re TFT-LCD (Flat Panel) Antitrust Litigation*, Case No. M:07-CV-1827-SI, MDL No. 1827, on March 12, 2010, and the case was reassigned to the Honorable Susan Illston on March 18, 2010;

WHEREAS, the Defendants have agreed to waive service and the parties have reached an agreement, pursuant to Civil L.R. 6-1(a), to extend the time within which the Defendants must move against, answer or otherwise respond to Dell’s Complaint;

WHEREAS, the Parties previously stipulated and the Court ordered (Dkt. 1801) Defendants to move against, answer or otherwise respond to Dell’s Complaint by July 6, 2010.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among the undersigned counsel, on behalf of their respective clients, Dell, on the one hand, and defendants Sharp Corporation; Sharp Electronics Corporation; Hitachi Displays, Ltd.; Hitachi Electronic Devices (USA), Inc.; Hitachi, Ltd.; Epson Imaging Devices Corporation; Epson Electronics America, Inc; Toshiba America Electronic Components, Inc.; Toshiba America Information Systems, Inc.; Toshiba Corporation; and Toshiba Mobile Display Co., Ltd. (collectively, “Defendants”) on the other hand, as follows:

1. Defendants will have until July 16, 2010, to move against, answer or otherwise respond to Dell’s Complaint.
2. Dell and Defendants agree to the following briefing schedule for any motion or motions to dismiss Dell’s Complaint (the “Motions”) and agree to file all motions or proposed orders as necessary to implement the agreed-upon schedule. To the extent the Court does not accept all or any part of the proposed schedule, Dell and

1 Defendants agree to work in good faith to establish a briefing schedule for the Motions
2 acceptable to all parties and the Court to replace that set forth below:

- 3 a. Dell will have until August 24, 2010 to file any response to the Motions;
4
5 b. Defendants will have until September 23, 2010 to file any reply brief(s) to
6 the Motions;
7
8 c. The hearing on the Motions will be noticed for October 7, 2010.

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10 3. Except as set forth above, all Local Rules shall remain in effect with respect to the
11 briefing on the Motions. Entering into this stipulation does not effect a waiver of any
12 defense under Federal Rule of Civil Procedure 12. This stipulation does not constitute
13 a waiver of any challenge to personal jurisdiction by any Defendant.

14 Dated: July 1, 2010

15 /s/ Kent M. Roger

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23 *Attorneys for Defendants Hitachi, Ltd., Hitachi Displays,*
24 *Ltd., and Hitachi Electronic Devices (USA), Inc.*

25 /s/ John Chung

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

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

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

FILER’S ATTESTATION

I, Kent M. Roger, am the ECF user whose identification and password are being used to file this Stipulation and [Proposed] Order. In compliance with General Order 45.X.B, I hereby attest that John Chung, Colin West, Jacob R. Sorensen, Steven P. Freccero, and Debra Bernstein concur in this filing.

/s/ Kent M. Roger
Kent M. Roger
*Attorneys for Defendants Hitachi Displays, Ltd.,
Hitachi Electronic Devices (USA), Inc., and
Hitachi, Ltd.*

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[PROPOSED] ORDER

Pursuant to the parties' stipulation set forth above and pursuant to Rule 6-1(a) of the Civil
Local Rules, IT IS SO ORDERED.

Dated:

By 

HON. SUSAN ILLSTON
UNITED STATES DISTRICT JUDGE