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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.,

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

19 Plaintiffs,

20 v.

**STIPULATION AND [~~PROPOSED~~] ORDER
 REGARDING TIME TO RESPOND TO
 AMENDED COMPLAINT**

21 SHARP CORPORATION; SHARP
 22 ELECTRONICS CORPORATION;
 23 HITACHI DISPLAYS, LTD.; HITACHI
 24 ELECTRONIC DEVICES (USA), INC.;
 25 HITACHI, LTD.; EPSON IMAGING
 26 DEVICES CORPORATION; EPSON
 27 ELECTRONICS AMERICA, INC.;
 28 HANNSTAR DISPLAY
 CORPORATION; TOSHIBA AMERICA
 ELECTRONIC COMPONENTS, INC.;
 TOSHIBA AMERICA INFORMATION
 SYSTEMS, INC.; TOSHIBA
 CORPORATION; and TOSHIBA
 MOBILE DISPLAY CO., LTD.,

Defendants.

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

3 WHEREAS Dell filed a first amended complaint on April 8, 2011 (“Amended
4 Complaint”);

5 WHEREAS Defendants Hitachi Displays, Ltd., Hitachi Electronic Devices (USA), Inc.
6 and Hitachi, Ltd. (collectively, the “Hitachi Defendants”) and Defendants Sharp Corporation and
7 Sharp Electronics Corporation, filed a motion to dismiss Count Six of the Amended Complaint
8 alleging violations of New York’s Donnelly Act claims on April 22, 2011;

9 WHEREAS the Court granted Defendants’ motion to dismiss Count Six of the Amended
10 Complaint on May 17, 2011;

11 WHEREAS the Hitachi Defendants’ deadline to respond to Dell’s Amended Complaint
12 currently is June 10, 2011;

13 WHEREAS extending the Hitachi Defendants’ time to respond to the Amended
14 Complaint will not alter the date of any other event or deadline already fixed by the Court;

15 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among the
16 undersigned counsel, on behalf of their respective clients, Dell, on the one hand, and the Hitachi
17 Defendants on the other hand, as follows:

- 18
19
20 1. Hitachi Defendants will have until July 11, 2011 to answer Dell’s Amended
21 Complaint.

1 Dated: June 9, 2011

2 /s/ Kent M. Roger

3 Kent M. Roger (SBN 95987)
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11 *Ltd., and Hitachi Electronic Devices (USA), Inc.*

12 /s/ Debra D. Bernstein

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Products L.P.*

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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 Debra Bernstein concurs in this filing.


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

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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: June 20, 2011

By 

HON. SUSAN ILLSTON
UNITED STATES DISTRICT JUDGE