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 14 STATE OF WISCONSIN

14 [additional parties and counsel listed in signature block]

15 UNITED STATES DISTRICT COURT
 16 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 17 (SAN FRANCISCO DIVISION)
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19
 20 IN RE: TFT-LCD (FLAT PANEL)
 21 ANTITRUST LITIGATION

MASTER FILE NO. 3:07-md-1827 SI, MQ
 MDL NO. 1827
 CASE NO. 3:10-cv-3619-SI

22 This Document Relates to
 23 Case No. 3:10-cv-3619 SI
 24 STATE OF WISCONSIN
 25 *Ex rel.* J.B. Van Hollen, Attorney General

**STIPULATION EXTENDING TIME FOR
 DISCOVERY WITH RESPECT TO THE
 STATE OF WISCONSIN AND
 [PROPOSED] ORDER**

26 Plaintiffs,

27 v.

28 AU Optronics Corporation, et al.,

Defendants.

1 Plaintiff State of Wisconsin (“Plaintiff”) and Defendants LG Display Co., Ltd., LG Display
2 America, Inc., AU Optronics Corporation, and AU Optronics Corporation America (“Defendants”),
3 parties to the above-entitled action (collectively referred to herein as the “Parties”), hereby stipulate
4 as follows:

5 **STIPULATION**

6 WHEREAS Defendant LG Display America, Inc. served an amended notice for the 30(b)(6)
7 deposition of the State of Wisconsin, scheduled for December 2, 2011; and

8 WHEREAS the Plaintiff’s designated deponent suddenly and unexpectedly became unable to
9 sit for the deposition scheduled for December 2, 2011;

10 WHEREAS the Parties agreed in response to extend the discovery cutoff date to January 9,
11 2012, with respect (1) any discovery served upon the State of Wisconsin prior to the date of this
12 stipulation; (2) the deposition of the designated Rule 30(b)(6) deponent for the State of Wisconsin;
13 and (3) any discovery that directly relates to issues or concerns raised during the deposition of
14 Wisconsin’s designated Rule 30(b)(6) deponent;

15 WHEREAS Defendants took the deposition of Wisconsin’s designated deponent on
16 December 21, 2011; and

17 WHEREAS Defendants have reasserted ongoing discovery requests that relate to issues or
18 concerns raised during the deposition of Wisconsin’s designated deponent;

19 NOW, THEREFORE, the Parties, through their undersigned respective counsel, stipulate and
20 request that the Court order that the discovery cutoff date of January 9, 2012, be extended through
21 and including January 31, 2012, solely with respect to the following discovery upon the Plaintiff
22 State of Wisconsin:

- 23 1. Any discovery served upon the State of Wisconsin prior to the date of this stipulation;
 - 24 2. Any discovery that directly relates to issues or concerns raised during the deposition of
25 Wisconsin’s designated Rule 30(b)(6) deponent.
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1 DATED: January 6, 2012
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3 By: /s/ Michael R. Lazerwitz
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15 *LG Display America, Inc.*

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27 *Counsel for Defendants AU Optronics Corporation*
28 *and AU Optronics Corporation America*

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1 **Attestation:** The filer of this document attests that concurrence in the filing of this document has
2 been obtained from each of the other signatories.
3

4 By: /s/ Michael R. Lazerwitz
5 Michael R. Lazerwitz
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[PROPOSED] ORDER

Under the parties' stipulation set forth above, IT IS SO ORDERED.

Dated _____

Hon. Susan Illston
United States District Judge

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