

1 MORGAN, LEWIS & BOCKIUS LLP
 2 KENT M. ROGER, State Bar No, 95987
 3 HERMAN J. HOYING, State Bar No. 257495
 4 JENNIFER L. CALVERT, State Bar No. 258018
 5 One Market, Spear Street Tower
 6 San Francisco, CA 94105-1126
 7 Tel: 415.442.1000
 8 Fax: 415.442.1001
 9 kroger@morganlewis.com
 10 hhoying@morganlewis.com
 11 jennifer.calvert@morganlewis.com

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 STATE OF OREGON, *ex rel.* John Kroger,
 19 Attorney General,
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 21 Plaintiffs,
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 23 v.
 24
 25 AU OPTRONICS CORPORATION, *et al.*,
 26
 27 Defendants.

This Document Relates to Individual Case No.
 3:10-cv-4346 SI
 Master File No. 3:07-md-1827
 MDL No. 1827

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

1 WHEREAS plaintiff State of Oregon (“Oregon”) filed the above captioned lawsuit on
2 August 10, 2010;

3 WHEREAS Oregon filed a first amended complaint on April 15, 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 Chi Mei Corporation,
7 Chi Mei Innolux Corporation, CMO Japan Co., Ltd., and Chi Mei Optoelectronic USA, Inc.
8 (collectively, the “Chi Mei Defendants”) jointly filed with other defendants a motion to dismiss
9 Count III in its entirety and Count IV to the extent it seeks “disgorgement of profits” as a remedy
10 on June 6, 2011;

11 WHEREAS the Court denied Defendants’ joint motion to dismiss Counts III and IV of the
12 Amended Complaint on July 12, 2011;

13 WHEREAS all defendants, including the Hitachi Defendants and Chi Mei Defendants,
14 entered into a stipulation with Oregon on July 21, 2011 that Defendants’ deadline to answer the
15 Amended Complaint was August 12, 2011;

16 WHEREAS on July 21, 2011, the Court entered an order extending Defendants’ deadline
17 to answer the Amended Complaint until August 12, 2011;

18 WHEREAS the Hitachi Defendants and Chi Mei Defendants entered into a stipulation
19 with Oregon on August 11, 2011 that the Hitachi Defendants’ and Chi Mei Defendants’ deadline
20 to answer the Amended Complaint is September 12, 2011;

21 WHEREAS on August 24, 2011, the Court entered an order extending the Hitachi
22 Defendants’ and Chi Mei Defendants’ deadline to answer the Amended Complaint until
23 September 12, 2011;

24 WHEREAS on August 24, 2011, the Court entered an order extending the Hitachi
25 Defendants’ and Chi Mei Defendants’ deadline to answer the Amended Complaint until
26 September 12, 2011;

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WHEREAS the Hitachi Defendants and Chi Mei Defendants entered into a stipulation with Oregon on September 9, 2011 that the Hitachi Defendants' and Chi Mei Defendants' deadline to answer the Amended Complaint is September 26, 2011;

WHEREAS on September 13, 2011 the Court entered an order extending the Hitachi Defendants' and Chi Mei Defendants' deadline to answer the Amended Complaint until September 26, 2011;

WHEREAS extending the Hitachi Defendants' and Chi Mei Defendants' time to respond to the Amended Complaint will not alter the date of any other event or deadline already fixed by the Court;

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

Hitachi Defendants and Chi Mei Defendants will have until November 4, 2011 to answer Oregon's Amended Complaint. Hitachi Defendants and Chi Mei Defendants agree that they will work with Oregon to expedite discovery during the time period October 4 through November 4, 2011, unless changed circumstances make clear immediate responses to Oregon's requests for discovery are unnecessary.

1 Dated: September 23, 2011

HAGLUND KELLEY HORNGREN JONES & WILDER
LLP

3 /s/ Michael K. Kelley

4 Michael E. Haglund (SBN 772030)

5 Michael K. Kelley (SBN 853782)

6 Shay S. Scott (SBN 934214)

HAGLUND KELLEY HORNGREN JONES & WILDER
LLP

7 200 SW Market Street, Suite 1777

8 Portland, OR 97201

9 Tel: (503) 225-0777

10 Fax: (503) 225-1257

11 mhaglund@hk-law.com

12 *Counsel for State of Oregon*

13 OREGON SENIOR ASSISTANT ATTORNEY GENERAL

14 Tim D. Nord (SBN 882800)

15 1162 Court Street, NW

16 Salem, OR 97301-4096

17 Tel: (503) 947-4333

18 Fax: (503) 225-1257

19 tim.d.nord@state.or.us

20 *Counsel for State of Oregon*

21 MORGAN LEWIS & BOCKIUS LLP

22 /s/ Kent M. Roger

23 Kent M. Roger (SBN 95987)

24 Morgan Lewis & Bockius LLP

25 One Market, Spear Street Tower

26 San Francisco, CA 94105

27 Tel: (415) 442-1000

28 Fax: (415) 442-1001

kröger@morganlewis.com

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

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DAVIS POLK & WARDWELL LLP

/s/ Sandra West

Christopher B. Hockett (SBN 121539)

Neal A. Potischman (SBN 254862)

Sandra West (SBN 250389)

Samantha H. Knox (SBN 254427)

Micah G. Block (SBN 270712)

DAVIS POLK & WARDWELL LLP

1600 El Camino Real

Menlo Park, CA 94025

Tel: (650) 752-2000

Fax: (650) 752-2111

chris.hockett@davispolk.com

neal.potischman@davispolk.com

sandra.west@davispolk.com

samantha.knox@davispolk.com

micah.block@davispolk.com

Jonathan D. Martin (admitted pro hac vice)

Bradley R. Hansen (admitted pro hac vice)

DAVIS POLK & WARDWELL LLP

450 Lexington Avenue

New York, NY 10017

Tel: (212) 450-4000

Fax: (212) 701-5800

jonathan.martin@davispolk.com

bradley.hansen@davispolk.com

Attorneys for Defendants Chimei Innolux Corporation

(F/K/A Chi Mei Optoelectronics Corp.), Chi Mei

Optoelectronics USA, Inc., and CMO Japan Co., Ltd.

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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 Michael M. Kelley and Sandra West concur 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: September 27, 2011

By 

HON. SUSAN ILLSTON
UNITED STATES DISTRICT JUDGE