

1 HUGH F. BANGASSER (*PRO HAC VICE*)
 2 RAMONA M. EMERSON (*PRO HAC VICE*)
 3 CHRISTOPHER M. WYANT (*PRO HAC*
 4 *VICE*)
 5 K&L GATES LLP
 925 Fourth Avenue, Suite 2900
 Seattle, WA 98104-1158
 Phone: (206) 623-7580
 Fax: (206) 623-7022

6 JEFFREY L. BORNSTEIN, State Bar No.
 #99358
 7 K&L Gates LLP
 8 Four Embarcadero Center, Suite
 1200
 San Francisco, CA 94111
 9 Phone: (415) 249-1059
 Fax: (415) 882-8220

10 Attorneys for Defendants
 11 HANNSTAR DISPLAY CORPORATION

12 **[Additional moving parties and counsel**
 13 **listed on signature pages]**

14 IN THE UNITED STATES DISTRICT COURT
 15 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 16 SAN FRANCISCO DIVISION

17 IN RE TFT-LCD (FLAT PANEL)
 18 ANTITRUST LITIGATION

Master File No. 3:10-4346 SI

MDL No. 3:07-MD-1827 SI

19 This document Related to Individual
 Case No. 3:10-4346 SI

**STIPULATION AND [~~PROPOSED~~]
 ORDER MODIFYING TRIAL
 SCHEDULE**

20 STATE OF OREGON, *ex rel.* John Kroeger,
 21 Attorney General,

Judge: Susan Illston

22 Plaintiff,

23 vs.

24 AU OPTRONICS CORPORATION, et al.,

25 Defendants.

1 The undersigned counsel, on behalf of the State of Oregon, ex rel. John Kroger, and
2 Defendants party to the above-captioned action (collectively “Parties”) hereby stipulate and agree
3 as follows:

4 WHEREAS the Parties have conferred regarding the schedule set in the Court’s Order re
5 Pretrial and Trial Schedule (Dkt. 2165) and modified by stipulation and order on July 12, 2011
6 (Dkt. 3110) (the “July 12 Stipulation”);

7 WHEREAS the Parties agree to the extension of dates set in the Pretrial and Trial Schedule
8 in order to allow sufficient time for discovery and related work;

9 NOW, THEREFORE, the Parties, through their undersigned respective counsel, stipulate
10 and agree as follows:

11 That the pretrial dates set forth in the Pretrial and Schedule, as modified by the July 12
12 Stipulation, are hereby amended solely as to State of Oregon v. Au Optronics Corporation, et al.,
13 Case No. 3:10-cv-04346-SI;

14 That State of Oregon v. Au Optronics Corporation, et al., Case No. 3:10-cv-04346-SI, shall
15 be considered as filed after December 1, 2010 solely for the purposes of the Pretrial and Trial
16 Schedule, as modified by the July 12 Stipulation, and for no other purpose; and

17 The Parties further stipulate that the close of fact discovery shall be amended and extended
18 to March 8, 2012. As to the other pretrial dates, the Parties agree to meet and confer no later than
19 January 6, 2012 to agree on a modified pretrial schedule.

20 IT IS SO STIPULATED.

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

1 Respectfully submitted this 6th day of December, 2011.

2
3 HAGLUND KELLEY HORNGREN JONES &
4 WILDER LLP

5 By: /s/ Michael K. Kelley

6 Michael E. Haglund (State Bar No. 772030)
7 Michael K. Kelley (State Bar No. 853782)
8 Shay S. Scott (State Bar No. 934214)
9 200 SW Market Street, Suite 1777
10 Portland, OR 97201
11 (503) 225-0777 (Phone)
12 (503) 225-1257 (Facsimile)
13 *mhaglund@hk-law.com*
14 Counsel for State of Oregon

15 OREGON SENIOR ASSISTANT ATTORNEY
16 GENERAL

17 Tim D. Nord (State Bar No. 882800)
18 1162 Court Street, NW
19 Salem, OR 97301-4096
20 (503) 947-4333 (Phone)
21 (503) 225-1257 (Facsimile)
22 *tim.d.nord@state.or.us*
23 Attorneys for STATE OF OREGON

24 K&L GATES LLP

25 By: /s/ Christopher M. Wyant

26 Hugh F. Bangasser, (*Pro Hac Vice*)
27 Ramona M. Emerson, (*Pro Hac Vice*)
28 Christopher M. Wyant, (*Pro Hac Vice*)
Jeffrey L. Bornstein, Bar No. 99358
925 Fourth Avenue, Suite 290
Seattle, WA 98104
Tel: (206) 623-7580
Fax: (206) 623-7022
chris.wyant@klgates.com

Attorneys for Defendants
HANNSTAR DISPLAY CORPORATION

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

NOSSAMAN LLP

By: /s/ Christopher A. Nedeau
Christopher A. Nedeau (Bar No. 81297)
50 California Street, 34th Floor
San Francisco, CA 94111
Tel: (415) 398-3600
Fax: (415) 398-2438
cnedeau@nossaman.com

Attorneys for Defendants
AU OPTRONICS CORPORATION AND AU
OPTRONICS CORPORATION AMERICA

SIMPSON THACHER & BARTLETT LLP

By: /s/ Harrison J. Frahn IV
Harrison J. Frahn IV
2550 Hanover Street
Palo Alto, CA 94304
Telephone: (650) 251-5000
Facsimile: (650) 251-5002
Email: *hfracn@stblaw.com*

Attorneys for Defendants CHIMEI INNOLUX
CORPORATION (F/K/A CHI MEI
OPTOELECTRONICS CORP.), CHI MEI
OPTOELECTRONICS USA, INC., AND CMO
JAPAN CO., LTD.

MORGAN, LEWIS & BOCKIUS LLP

By: /s/ Kent M. Roger
Kent M. Roger (Bar No. 95987)
One Market, Spear Street Tower
San Francisco, CA 94105
Tel: (415) 442-1140
Fax: (415) 442-1001
kruger@morganlewis.com

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

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

MORRISON & FOERSTER LLP

By: /s/ Stephen P. Freccero
Stephen P. Freccero (Bar No. 131093)
425 Market Street
San Francisco, CA 94105-2482
Tel: (415) 268-7000
Fax: (415) 268-7522
SFreccero@mofa.com

Attorneys for Defendants
EPSON IMAGING DEVICES
CORPORATION AND EPSON
ELECTRONICS AMERICA, INC.

CLEARY GOTTlieb STEEN & HAMILTON
LLP

By: /s/ Michael R. Lazerwitz
Michael R. Lazerwitz (PRO HAC VICE)
Jeremy J. Calsyn (State Bar No. 205062)
Lee F. Berger (State Bar No. 222756)
CLEARY GOTTlieb
STEEN & HAMILTON LLP
One Liberty Plaza
New York, NY 10006
(212) 225-2000 (Phone)
(212) 225-3999 (Facsimile)
mlazerwitz@cgsh.com

Attorneys for Defendants LG DISPLAY CO.,
LTD., and LG DISPLAY AMERICA, INC.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

COVINGTON & BURLING LLP

By: /s/ Robert D. Wick
Robert D. Wick
1201 Pennsylvania Avenue, N.W.
Washington, D.C. 20006
Tel: (202) 662-6000
Fax: (202) 662-6291
rwick@cov.com

Attorneys for Defendants
SAMSUNG ELECTRONICS AMERICA, INC.,
SAMSUNG SEMICONDUCTOR, INC., and
SAMSUNG ELECTRONICS CO., LTD.

PILLSBURY WINTHROP SHAW PITTMAN LLP

By: /s/ John M. Grenfell
John M. Grenfell (State Bar No. 88500)
50 Fremont Street
San Francisco, CA 94105
Tel: (415) 983-1000
Fax: (415) 983-1200
john.grenfell@pillsburylaw.com

Attorneys for Defendants
SHARP CORPORATION AND SHARP
ELECTRONICS CORPORATION

WHITE & CASE LLP

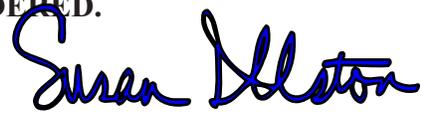
By: /s/ John H. Chung
John H. Chung, (*Pro Hac Vice*)
1155 Avenue of the Americas
New York, NY 10036
Tel: (212) 819-8200
Fax: (212) 354-8113
jchung@ny.whitecase.com

Attorneys for Defendants
TOSHIBA CORPORATION, TOSHIBA
MOBILE DISPLAY TECHNOLOGY CO.,
LTD., TOSHIBA AMERICA INFORMATION
SYSTEMS, INC., TOSHIBA AMERICA
ELECTRONIC COMPONENTS, INC.

ATTESTATION: *The filer of this document attests that the concurrence of the signatories thereto has been obtained:*

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PURSUANT TO STIPULATION, IT IS SO ORDERED.



12/6/11

Date Entered

Honorable Judge Susan Illston

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE BY E-MAIL
(Federal Rules of Civil Procedure Rule 5(b))

I declare that I am employed with the law firm of K&L Gates, LLP, whose address is 925 4th Avenue, Suite 2900, Seattle, Washington 98104-1158. I am not a party to the case, and I am over the age of eighteen years.

I further declare that on December 6, 2011, I served a copy of:

STIPULATION AND [PROPOSED] ORDER MODIFYING TRIAL SCHEDULE

by electronically mailing a true and correct copy to all parties of record through the CM-ECF system in accordance with Federal Rules of Civil Procedure Rule 5(b).

I declare under penalty of perjury that the above is true and correct.

Executed at Seattle, Washington, this 6th day of December, 2011.

/s/ Christopher M. Wyant
Christopher M. Wyant