

1 Jeffrey H. Howard (*pro hac vice*)
 2 Jerome A. Murphy (*pro hac vice*)
 3 CROWELL & MORING LLP
 4 1001 Pennsylvania Avenue, N.W.
 5 Washington, D.C. 20004
 Telephone: 202-624-2500
 Facsimile: 202-628-5116
 Email: jhoward@crowell.com
jmurphy@crowell.com

6 Jason C. Murray (CA Bar No. 169806)
 7 Joshua C. Stokes (CA Bar No. 220214)
 8 Nathaniel J. Wood (CA Bar No. 223547)
 9 CROWELL & MORING LLP
 10 515 South Flower St., 40th Floor
 Los Angeles, CA 90071
 Telephone: 213-622-4750
 Facsimile: 213-622-2690
 Email: jmurray@crowell.com
jstokes@crowell.com

11 *Liaison Counsel for Undersigned Direct Action*
 12 *Plaintiffs*

13 [Additional counsel listed on signature page]

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

18 In re TFT-LCD (FLAT PANEL) ANTITRUST
 19 LITIGATION

Master Docket No. 07-m-1827 SI

MDL No. 1827

20 This Document Relates To:

21 *Best Buy Co., Inc., et al. v. AU Optronics*
 22 *Corporation, et al., Case No. 10-cv-04572 SI*

23 *Electrograph Systems, Inc., et al. v. Epson*
 24 *Imaging Devices Corporation, et al., Case No.*
 25 *10-cv-00117 SI*

26 *Target Corp., et al. v. AU Optronics*
 27 *Corporation, et al., Case No. 10-cv-04945 SI*

28 *Alfred H. Siegel, As Trustee of the Circuit*
City Stores, Inc. Liquidating Trust v. AU
Optronics Corporation, et al., Case No. 10-
cv05625 SI

**STIPULATION AND [~~PROPOSED~~]
 ORDER REGARDING BRIEFING
 SCHEDULE FOR LG DISPLAY'S
 MOTION FOR LEAVE TO AMEND**

1 *SB Liquidation Trust v. AU Optronics*
2 *Corporation, et al., Case No. 10-cv-05458 SI*

3 *Tracfone Wireless, Inc. v. AU Optronics*
4 *Corporation, et al., Case No. 10-cv-03205 SI*

5 *Costco Wholesale Corporation v. AU*
6 *Optronics Corporation, et al., Case No. 11-*
7 *cv00058 SI*

8 *Motorola Mobility, Inc. v. AU Optronics*
9 *Corporation, et al., C 09-5840 SI*

10 *AT&T Mobility LLC, et al. v. AU Optronics*
11 *Corporation, et al., No. 3:09-cv-4997 SI*

12 *State of Florida v. AU Optronics Corporation, et*
13 *al., Case No. 10-cv-3517 SI.*

14 *State of Missouri, et al. v. AU Optronics*
15 *Corporation, et al., Case No. 10-cv-03619 SI*

16 *State of Oregon, ex rel John Kroger, Attorney*
17 *General v. AU Optronics Corporation, et al.,*
18 *Case No. 3:10-4346 SI*

19

20

21

22

23

24

25

26

27

28

1 Defendants LG Display America, Inc. and LG Display Co., Ltd. (collectively, “LG
2 Display”) and the Direct Action Plaintiffs (“DAPs”) and State Attorneys General (“AGs”) in the
3 above captioned actions stipulate as follows:

4 WHEREAS LG Display filed a Motion for leave to amend their respective Answers and
5 to add Additional Defenses and a Counterclaim for Declaratory Relief in *Best Buy Co., Inc., et al.*
6 *v. AU Optronics Corporation, et al.*, Case No. 10-cv-04572 SI, *Electrograph Systems, Inc., et al.*
7 *v. Epson Imaging Devices Corporation, et al.*, Case No. 10-cv-00117 SI, *Target Corp., et al. v.*
8 *AU Optronics Corporation, et al.*, Case No. 10-cv-04945 SI, *Alfred H. Siegel, As Trustee of the*
9 *Circuit City Stores, Inc. Liquidating Trust v. AU Optronics Corporation, et al.*, Case No. 10-
10 *cv05625 SI, SB Liquidation Trust v. AU Optronics Corporation, et al.*, Case No. 10-cv-05458 SI,
11 *Tracfone Wireless, Inc. v. AU Optronics Corporation, et al.*, Case No. 10-cv-03205 SI, *Costco*
12 *Wholesale Corporation v. AU Optronics Corporation, et al.*, Case No. 11-cv00058 SI, *Motorola*
13 *Mobility, Inc. v. AU Optronics Corporation, et al.*, C 09-5840 SI, *AT&T Mobility LLC, et al. v.*
14 *AU Optronics Corporation, et al.*, No. 3:09-cv-4997 SI, *State of Florida v. AU Optronics*
15 *Corporation, et al.*, Case No. 10-cv-3517 SI, *State of Missouri, et al. v. AU Optronics*
16 *Corporation, et al.*, Case No. 10-cv-03619 SI, *State of Oregon, ex rel John Kroger, Attorney*
17 *General v. AU Optronics Corporation, et al.*, Case No. 3:10-4346 SI pursuant to Rule 15(a) of the
18 Federal Rules of Civil Procedure on March 22, 2012 (hereafter, “LG Display’s Motion to
19 Amend”);

20 WHEREAS the DAPs and AGs are currently required to file their Opposition to LG
21 Display’s Motion to Amend on or before April 5, 2012;

22 WHEREAS the hearing on LG Display’s Motion to Amend is scheduled to be to be heard
23 on May 18, 2012;

24 WHEREAS the parties desire to continue the briefing schedule for LG Display’s Motion
25 to Amend until after the April 20, 2012 hearing on duplicative recovery in the Indirect Purchaser
26 Plaintiff case, and believe that a continuance will allow for more efficient use of the Court’s and
27 the parties time by potentially streamlining issues for resolution;

28

1 IT IS HEREBY STIPULATED AND AGREED by the undersigned DAPs, AGs, and LG
2 Display, by and through their undersigned liaison counsel and subject to the concurrence of the
3 Court, as follows:

4 (1) The time for the undersigned DAPs and AGs served with LG Display's Motion to
5 Amend to file their Oppositions to LG Display's Motion shall be extended to and including April
6 27, 2012. The DAPs shall file a single opposition brief to LG Display's Motion to Amend.

7 (2) LG Display's time to file its Reply(ies) in support of its Motion shall be extended to
8 and including May 8, 2012.

9
10 DATED: April 5, 2012

11 *Liaison Counsel for Direct*
12 *Action Plaintiffs and Counsel*
13 *for Motorola Mobility, Inc.;*
14 *AT&T Mobility, LLC; AT&T*
15 *Corp.; AT&T Services, Inc.;*
16 *BellSouth Telecommunications,*
17 *Inc.; Pacific Bell Telephone*
18 *Company; AT&T Operations,*
19 *Inc.; AT&T DataComm, Inc.;*
20 *Southwestern Bell Telephone*
21 *Company; Target Corporation;*
22 *Sears, Roebuck and Co.;*
23 *Kmart Corporation; Old Comp*
24 *Inc.; Good Guys, Inc.;*
25 *RadioShack Corporation; and*
26 *Newegg Inc.*

By: /s/ Joshua C. Stokes

Jerome A. Murphy (*pro hac vice*)
Jeffrey H. Howard (*pro hac vice*)
CROWELL & MORING LLP
1001 Pennsylvania Avenue, N.W.
Washington, DC 20004
Telephone: (202) 623-2500
Facsimile: (202) 628-5116
Email: jmurphy@crowell.com
Email: jhoward@crowell.com

Jason C. Murray (CA Bar No. 169806)
Joshua C. Stokes (CA Bar No. 220214)
CROWELL & MORING LLP
515 South Flower St., 40th Floor
Los Angeles, CA 90071
Telephone: (213) 443-5582
Facsimile: (213) 622-2690
Email: jmurray@crowell.com
Email: jstokes@crowell.com

R. Bruce Holcomb (*pro hac vice*)
ADAMS HOLCOMB LLP
1875 Eye Street NW
Washington, DC 20006
Telephone: (202) 580-8820
Facsimile: (202) 580-8821
Email: holcomb@adamsholcomb.com

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

Counsel for SB Liquidation Trust

By: /s/ David H. Orozco
DIAMOND McCARTHY LLP
Allan Diamond, Esq.
James D. McCarthy, Esq.
Jason Fulton, Esq.
909 Fannin, Suite 1500
Houston, Texas 77010
Telephone: (713) 333-5104
Facsimile: (713) 333-5199
Email: adiamond@diamondmccarthy.com
jmccarthy@diamondmccarthy.com
jfulton@diamondmccarthy.com

SUSMAN GODFREY LLP
Marc M. Seltzer, Esq.
Ryan C. Kirkpatrick, Esq.
David H. Orozco, Esq.
Steven G. Sklaver, Esq.
1901 Avenue of the Stars
Suite 950
Los Angeles, CA 90067-6029
Telephone : (310) 789-3100
Facsimile: (310) 789-3150
Email: mseltzer@susmangodfrey.com
rkirkpatrick@susmangodfrey.com
dorozco@susmangodfrey.com
ssklaver@susmangodfrey.com

Counsel for Plaintiffs Alfred H. Siegel, as Trustee of the Circuit City Stores Inc. Liquidating Trust

By: /s/ Jonathan Ross
Jonathan Ross
SUSMAN GODFREY LLP
1000 Louisiana, Ste, 5100
Houston, TX 77002
Telephone: (713) 653-7813
Facsimile: (713) 654-6666

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

Counsel for Plaintiffs Electrograph Systems, Inc. and Electrograph Technologies Corp.

By: /s/ Philip J. Iovenio
BOIES, SCHILLER & FLEXNER LLP
William A. Isaacson (admitted pro hac vice)
Boies, Schiller & Flexner LLP
5301 Wisconsin Ave. NW, Suite 800
Washington, D.C. 20015
Telephone: (202) 237-2727
Facsimile: (202) 237-6131
Email: wisaacson@bsflp.com

BOIES, SCHILLER & FLEXNER LLP
Philip J. Iovenio (admitted pro hac vice)
10 North Pearl Street
4th Floor
Albany, NY 12207
Telephone: 518-434-0600
Facsimile: 518-434-0665
Email: piovieno@bsflp.com

Counsel for Plaintiffs Tracfone Wireless, Inc.

By: /s/ David B. Esau
CARLTON FIELDS
James Blaker Baldinger, Esq.
David B. Esau, Esq.
CityPlace Tower, Suite 1200
525 Okeechobee Boulevard
West Palm Beach, FL 33401
Telephone : (561) 659-7070
Facsimile: (561) 659-7368
Email: jbaldinger@carltonfields.com
desau@carltonfields.com

CARLTON FIELDS
Robert L. Ciotti, Esq.
4221 W Boy Scout Boulevard
10th Floor - Corporate Center III
Tampa, FL 33067-5736
Telephone : (813) 223-7000
Facsimile: (813) 229-4133
Email: rciotti@carltonfields.com

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

Counsel Counsel for Plaintiffs Best Buy Co., Inc.; Best Buy Purchasing LLC; Best Buy Enterprise Services, Inc.; Best Buy Stores, L.P.; Best Buy.com, LLC; and Magnolia Hi-Fi, Inc.

By: /s/ Roman M. Silberfeld
Roman M. Silberfeld
David Martinez
ROBINS, KAPLAN, MILLER & CIRESI LLP
2049 Century Park East, Suite 3400
Los Angeles, CA 90067-3208
Telephone: (310) 552-0130
Facsimile: (310) 229-5800

rkirkpatrick@susmangodfrey.com
dorozco@susmangodfrey.com
ssklaver@susmangodgrey.com

Counsel for Plaintiffs Costco Wholesale Corporation

By: /s/ David J. Burman
David J. Burman
PERKINS COIE LLP
1201 Third Avenue
Suite 4800
Seattle, WA 98101-3099
Telephone: (206) 359-8000
Facsimile: (206) 359-9000

Attorneys for Plaintiff State of Florida

By: /s/ Nicholas J. Weilhammer
Nicholas J. Weilhammer
STATE OF FLORIDA
Pro Hac Vice
Office of the Attorney General
State of Florida
PL-01, The Capitol
Tallahassee, FL 32399-1050
Tel: (850) 414-3300
Fax: (850) 488-9134

Attorneys for Plaintiff State of Missouri

By: /s/ Anne E. Schneider
Anne E. Schneider
STATE OF MISSOURI
Assistant Attorneys General
Missouri Attorney General Office
P. O. Box 899
Jefferson City, MO 65102

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

*Attorneys for Plaintiff State of
Arkansas*

By: /s/ Kevin Wells
Kevin Wells
STATE OF ARKANSAS
Assistant Attorney General
Arkansas Attorney General Office
323 Center Street, Suite 500
Little Rock, AR 72201

*Attorneys for Plaintiff State of
Michigan*

By: /s/ M. Elizabeth Lippitt
M. Elizabeth Lippitt
STATE OF MICHIGAN
Assistant Attorney General
Michigan Attorney General Office
Corporate Oversight Division
525 West Ottawa Street, 6th Floor
Lansing, MI 48933

*Attorneys for Plaintiff State of West
Virginia*

By: /s/ Douglas L. Davis
Douglas L. Davis
STATE OF WEST VIRGINIA
Assistant Attorney General
West Virginia Attorney General Office
812 Quarrier St., First Floor
Charleston, WV 25301

*Attorneys for Plaintiff State of
Wisconsin*

By: /s/ Gwendolyn J. Cooley
Gwendolyn J. Cooley
STATE OF WISCONSIN
Assistant Attorney General
Wisconsin Department of Justice
PO Box 7857
Madison, WI 53707

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

Attorneys for Plaintiff State of Oregon

By: /s/ Michael E. Haglund
Michael E. Haglund (pro hoc vice)
Michael K. Kelley (pro hoc vice)
STATE OF OREGON
HAGLUND KELLEY JONES & WILDER LLP
Special Assistant Attorneys General for
the State of Oregon
200 SW Market Street, Suite 1777
Portland, Oregon 97201

Tim D. Nord, OSB No. 882800
Oregon Senior Assistant Attorney General
1162 Court Street, NE
Salem, OR 97301-4096
Telephone: (503) 943-4400
Facsimile: (503) 225-1257

Counsel for Defendants LG Display Co., Ltd. and LG Display America, Inc.

By: /s/ Lee F. Berger
Holly A. House (SB# 136045)
hollyhouse@paulhastings.com
Kevin C. McCann (SB# 120874)
kevinmccann@paulhastings.com
Sean D. Unger (SB# 231694)
seanunger@paulhastings.com
PAUL HASTINGS LLP
55 Second Street
Twenty-Fourth Floor
San Francisco, CA 94105-3441
Telephone: (415) 856-7000
Facsimile: (415) 856-7100

Lee F. Berger (SB# 222756)
leeberger@paulhastings.com
PAUL HASTINGS LLP
875 15th Street, N.W.
Washington, DC 20005
Telephone: (202) 551-1772
Facsimile: (202) 551-0172

Gregory J. Weingart (State Bar No. 157997)
Hailyn J. Chen (State Bar No. 237436)
MUNGER, TOLLES & OLSON LLP
355 South Grand Avenue
Los Angeles, CA 90071-1560
Telephone: (213) 683-9100
Facsimile: (213) 687-3702

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

Michael R. Lazerwitz (pro hac vice)
CLEARY GOTTLIEB STEEN & HAMILTON
LLP
One Liberty Plaza
New York, NY 10006
Telephone: (212) 225-2000
Facsimile: (212) 225-3999

IT IS SO ORDERED.

DATED: April 6 2012



Hon. Susan Illston, United States District Judge

Attestation: The filer of this document attests that the concurrence of the signatories thereto has been obtained.

DCACTIVE-18025086.4