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10 **[Additional moving parties and counsel listed**  
 11 **on signature pages]**

12 UNITED STATES DISTRICT COURT  
 13 NORTHERN DISTRICT OF CALIFORNIA  
 14 (SAN FRANCISCO DIVISION)

16 IN RE: TFT-LCD (FLAT PANEL)  
 ANTITRUST LITIGATION

No. 3:07-md-1827 SI  
 MDL No. 1827

18 This Document Relates to Individual Case  
 No. 10-cv-4572 SI

**STIPULATION AND ~~[PROPOSED]~~**  
**ORDER RE DISCOVERY AND MOTION**  
**TO COMPEL DEADLINES**

20 BEST BUY CO., INC., et al.,  
 21 Plaintiffs,

Honorable Susan Illston

22 v.

23 AU OPTRONICS CORPORATION, et al.,  
 24 Defendants.

26 Plaintiffs and the Stipulating Defendants, through the undersigned counsel, request that  
 27 the Court enter the following stipulated order.  
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**STIPULATION**

WHEREAS discovery closed in this case on December 8, 2011, as set forth in the Stipulation and Order Modifying Pretrial Schedule for “Track One” Direct Action Plaintiff and State Attorney General Actions (Dkt. No. 3110, the “Scheduling Order”);

WHEREAS the parties submitted a Stipulation and Proposed Order to the Court extending the close of fact discovery set forth in the Scheduling Order for the limited purpose of extending the deadline for Best Buy and certain other Direct Action Plaintiffs in Track One to respond to discovery requests served by defendants between October 31 and November 4, 2011, as well as negotiating the proper scope of those responses;

WHEREAS Best Buy and Stipulating Defendants are currently meeting and conferring concerning various issues related to: (1) Best Buy’s responses to the Stipulating Defendants’ written discovery served by Best Buy on or before December 2, 2011; (2) Best Buy’s production of documents and responses to transactional data questions as of December 8, 2011; and (3) the depositions of certain Best Buy employees or former employees that Defendants intend to conduct (collectively, “Best Buy’s Discovery Responses”).

WHEREAS Best Buy and Stipulating Defendants hope to resolve some or all of these issues informally, without the need to file motions to compel and seek the Court’s involvement;

WHEREAS the current deadline for parties to file motions to compel with respect to Best Buy’s Discovery Responses or Defendants’ Discovery Responses is December 15, 2011; and

WHEREAS in an effort to facilitate the informal resolution of any disputes, the parties wish to extend the deadline for Defendants to file any motions to compel with respect to Best Buy’s Discovery Responses through January 13, 2012;

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

1. The deadline for the Stipulating Defendants to file any motion to compel with respect to Best Buy’s Discovery Responses is extended through and including January 13, 2012.

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2. That the date set forth in the Pretrial and Trial Schedule Order, as modified by the July 12 Stipulation, for close of fact discovery in the above-captioned action is hereby extended until January 31, 2012 solely for the limited purpose of permitting Defendants to take depositions of certain Best Buy witnesses. This stipulation does not extend the discovery cut-off for any other discovery.

**IT IS SO STIPULATED.**

Dated: December 14, 2011.

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**Pursuant to General Order 45, Part X-B, the filer attests that concurrence in the filing of this document has been obtained from the above-referenced counsel.**

**ORDER**

Having considered the foregoing stipulation, and good cause appearing,

**IT IS SO ORDERED.**

12/16/11  
Date Entered

  
Judge Susan Illston

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**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 4<sup>th</sup> 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 14, 2011, I served a copy of:

**STIPULATION AND [PROPOSED] ORDER RE DISCOVERY AND MOTION TO COMPEL DEADLINES**

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 14th day of December, 2011.

\_\_\_\_\_  
Christopher M. Wyant

\_\_\_\_\_  
/s/ Christopher M. Wyant  
(Signature)