

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

5
 6 JEFFREY L. BORNSTEIN, State Bar No. #99358
 K&L Gates LLP
 Four Embarcadero Center, Suite 1200
 7 San Francisco, CA 94111
 Phone: (415) 249-1059
 8 Fax: (415) 882-8220

9 Attorneys for Defendants
 HANNSTAR DISPLAY CORPORATION

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.,

Honorable Susan Illston

21 Plaintiffs,

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”), and the parties previously submitted a stipulation to the Court extending the deadline for Defendants to file motions to compel as to certain discovery to January 13, 2012;

WHEREAS the Court previously entered a Stipulation and Proposed Order 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; 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 January 13, 2012; 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 27, 2012;

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

1 1. The deadline for the Stipulating Defendants to file any motion to compel with
2 respect to Best Buy's Discovery Responses is extended through and including January 27, 2012.
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4 **IT IS SO STIPULATED.**

5 Dated: January 13, 2012.

ROBINS KAPLAN MILLER & CIRESI, LLP

7 By: /s/ David Martinez
David Martinez

8 Roman M. Silberfeld (Bar No. 62783)
9 David Martinez (Bar No. 193183)
2049 Century Park East, Suite 3400
10 Los Angeles California, 90067-3208
11 Phone: (310) 552-0130
Fax: (310) 229-5800
DMartinez@rkmc.com

12 Attorneys for Plaintiffs

14 K&L GATES LLP

15 By: /s/ Christopher Wyant
16 Hugh F. Bangasser, (*Pro Hac Vice*)
17 Ramona M. Emerson, (*Pro Hac Vice*)
Christopher M. Wyant, (*Pro Hac Vice*)

18 K&L GATES LLP
925 Fourth Avenue, Suite 2900
19 Seattle, WA 98104-1158
Phone: (206) 623-7580
20 Fax: (206) 623-7022

21 JEFFREY L. BORNSTEIN, STATE BAR NO. 99358
K&L GATES LLP
22 Four Embarcadero Center, Suite 1200
San Francisco, CA 94111
23 Phone: (415) 249-1059
24 Fax: (415) 882-8220

25 Attorneys for Defendant HANNSTAR
26 DISPLAY CORPORATION

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NOSSAMAN LLP

By: /s/ Christopher Nedeau
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

Attorneys for Defendants
AU OPTRONICS CORPORATION AND
AU OPTRONICS CORPORATION
AMERICA

HILLIS CLARK MARTIN & PETERSON
P.S.

By: /s/ Michael R. Scott
Michael R. Scott (pro hac vice)
Michael J. Ewart (pro hac vice)
Hillis Clark Martin & Peterson P.S.
1221 Second Avenue, Suite 500
Seattle WA 98101-2925
Telephone: (206) 623-1745
Facsimile: (206) 623-7789
mrs@hcmp.com; mje@hcmp.com

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

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MORRISON & FOERSTER LLP

By: /s/ Stephen Freccero
Stephen P. Freccero

Melvin R. Goldman (Bar No. 34097)
Stephen P. Freccero (Bar No. 131093)
Derek F. Foran (Bar No. 224569)
425 Market Street
San Francisco, CA 94105-2482
Tel: (415) 268-7000
Fax: (415) 268-7522

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

MORGAN, LEWIS & BOCKIUS LLP

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

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

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PAUL HASTINGS LLP

By: /s/ Holly House
Holly House (SBN 136045)
Kevin C. McCann (SBN 120874)
55 Second Street, Twenty-Fourth Floor
San Francisco, CA 94105-3441
(415) 856-7000 / (415) 856-7100
hollyhouse@paulhastings.com
kevinmccan@paulhastings.com

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

PILLSBURY WINTHROP SHAW PITTMAN
LLP

By /s/ John Grenfell
John M. Grenfell

John M. Grenfell (State Bar No. 88500)
Jacob R. Sorensen (State Bar No. 209134)
50 Fremont Street
San Francisco, CA 94105
Tel: (415) 983-1000
Fax: (415) 983-1200

Attorneys for Defendants
SHARP CORPORATION AND SHARP
ELECTRONICS CORPORATION

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GIBSON DUNN & CRUTCHER LLP

By: /s/ Rachel Brass
Rachel S. Brass

Joel S. Sanders (Bar No. 107234)
Rachel S. Brass (Bar No. 219301)
Rebecca Justice Lazarus (Bar No. 227330)
555 Mission Street, Suite 3000
San Francisco, CA 94105-2933
Tel: (415) 393-8200
Fax: (415) 393-8306

Attorneys for Defendants
CHUNGHWA PICTURE TUBES, LTD.
AND TATUNG COMPANY OF
AMERICA, INC.

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.

1/18/12

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 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 January 13, 2012, 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 13th day of January, 2012.

Christopher M. Wyant

/s/ Christopher M. Wyant
(Signature)