

1 Michael R. Lazerwitz (PRO HAC VICE)
 Jeremy J. Calsyn (State Bar No. 205062)
 2 Lee F. Berger (State Bar No. 222756)
 CLEARY GOTTLIEB STEEN & HAMILTON LLP
 3 One Liberty Plaza
 New York, NY 10006
 4 (212) 225-2000 (Phone)
 (212) 225-3999 (Facsimile)
 5 *mlazerwitz@cgsh.com*

6 Counsel for Defendants
 LG DISPLAY AMERICA, INC.
 7 LG DISPLAY CO., LTD.

8
 9 Jason C. Murray (State Bar No. 169806)
 Nathaniel J. Wood (State Bar No. 223547)
 10 CROWELL & MORING LLP
 515 South Flower St., 40th Floor
 11 Los Angeles, CA 90071
 (213) 443-5582 (Phone)
 12 (213) 622-2690 (Facsimile)
 13 *jmurray@crowell.com*

14 Counsel for Plaintiff
 NEWEGG INC.

15
 16 UNITED STATES DISTRICT COURT
 17 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 18 (SAN FRANCISCO DIVISION)

19
 20 IN RE: TFT-LCD (FLAT PANEL)
 ANTITRUST LITIGATION

MASTER CASE NO. 3:07-md-1827 SI, MQ
 CASE NO. 10-cv-4945-SI, MQ
 MDL NO. 1827

21 This Document Relates To:

22 Case No. 10-cv-4945 SI, MQ

23 Target Corp., et al.,

24 Plaintiffs,

25 v.

26 AU Optronics Corporation, et al.,

27 Defendants.

28
**STIPULATION AND ~~[PROPOSED]~~
 ORDER PERMITTING DEPOSITION OF
 MANDY WANG BEYOND DISCOVERY
 CUTOFF DATE**

1
2 Plaintiff Newegg Inc. ("Plaintiff") and Defendants LG Display Co., Ltd. and LG Display
3 America, Inc. ("LG Display Defendants"), parties to the above-entitled action (collectively referred to
4 herein as the "Parties"), hereby stipulate as follows:

5
6 **STIPULATION**

7 WHEREAS, the Parties have met and conferred to discuss scheduling the deposition of
8 Plaintiff's employee, Mandy Wang, for several weeks now;

9 WHEREAS, Ms. Wang is not available for a deposition before the discovery cutoff date of
10 December 8, 2011;

11 WHEREAS, Plaintiff has agreed to make Ms. Wang available for a deposition after the
12 discovery cutoff as set forth below, if the LG Display Defendants choose to notice her deposition;

13 NOW, THEREFORE, the Parties, through their undersigned respective counsel, stipulate and
14 request that the Court order as follows:

15 1. That the discovery cutoff date of December 8, 2011, be extended for the sole purpose
16 of the aforementioned, proposed deposition; and

17 2. That the LG Display Defendants may take the deposition of Mandy Wang on or
18 between January 16, 2012 and January 31, 2012, or, if Ms. Wang remains unavailable during that
19 period, on a date or dates to be determined by mutual agreement between the Parties.

20
21 DATED: November 28, 2011

22
23 By: s/ Michael R. Lazerwitz
24 Michael R. Lazerwitz (PRO HAC VICE)
25 Jeremy J. Calsyn (State Bar No. 205062)
26 Lee F. Berger (State Bar No. 222756)
27 CLEARY GOTTlieb STEEN & HAMILTON LLP
28 One Liberty Plaza
New York, NY 10006
(212) 225-2000 (Phone)
(212) 225-3999 (Facsimile)
mlazerwitz@cgsh.com

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

3
4 By: *s/ Nathaniel J. Wood*
5 Jason C. Murray (State Bar No. 169806)
6 Nathaniel J. Wood (State Bar No. 223547)
7 CROWELL & MORING LLP
8 515 South Flower Street, 40th Floor
9 Los Angeles, CA 90071
10 (213) 422-5582 (Phone)
11 (213) 622-2690 (Facsimile)
12 jmurray@crowell.com

13 *Counsel for Plaintiff Newegg Inc.*

14 **Attestation:** The filer of this document attests that concurrence in the filing of this document has
15 been obtained from each of the other signatories.

16
17 By: */s/ Michael R. Lazerwitz*
18 Michael R. Lazerwitz
19
20
21
22
23
24
25
26
27
28

[PROPOSED] ORDER

Under the parties' stipulation set forth above, IT IS SO ORDERED.



Dated 11/29/11

Hon. Susan Illston
United States District Judge

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