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11	Counsel for Plaintiff Motorola Mobility, Inc.		
12	[Additional counsel listed on signature page]		
13	LINITED STATES D	JSTRICT COLIRT	
14	UNITED STATES DISTRICT COURT		
15		NORTHERN DISTRICT OF CALIFORNIA	
16	SAN FRANCISCO DIVISION		
17	I THE LOD (FLAT DANIEL) AND TO THE LOS OF	Master Docket No. 07-m-1827 SI	
18	In re TFT-LCD (FLAT PANEL) ANTITRUST LITIGATION	Master Docket No. 07-III-1827 SI	
19	This Document Relates To:	STIPULATION AND [PROPOSED] ORDER REGARDING RULE 30(B)(6)	
20	Motorola Mobility, Inc. v. AU Optronics Corporation, et al., C 09-5840 SI	DEPOSITION OF PHILIPS ELECTRONICS NORTH AMERICA	
21	Target Corporation, et al., v. AU Optronics	CORPORATION AND FACT DISCOVERY CUT-OFF	
22	Corporation, et al., 3:10-cv-4945 SI		
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CROWELL & MORING LLP ATTORNEYS AT LAW		MASTER DOCKET NO. 07-M-1827 SI	

1	Defendant Philips Electronics North America Corporation ("PENAC") and Plaintiffs		
2	Motorola Mobility, Inc.; Target Corp.; Sears, Roebuck and Co.; Kmart Corp.; Old Comp Inc.;		
3	Good Guys, Inc.; RadioShack Corp; and Newegg Inc. ("Plaintiffs") stipulate as follows:		
4	WHEREAS Plaintiffs have noticed the deposition of PENAC pursuant to Federal Rule of		
5	Civil Procedure 30(b)(6);		
6	WHEREAS the discovery cut-off in the Direct Action Plaintiffs' track one cases is		
7	December 8, 2011;		
8	WHEREAS PENAC was added to Plaintiffs' respective actions in the past few months;		
9	WHEREAS the parties have had limited time to conduct discovery;		
10	WHEREAS PENAC is still diligently working to produce documents to Plaintiffs;		
11	WHEREAS Plaintiffs and PENAC have met and conferred regarding scheduling the Rule		
12	30(b)(6) deposition of PENAC; and		
13	WHEREAS the parties are discussing a potential resolution to the above-captioned		
14	actions;		
15	THEREFORE, PENAC, by its counsel, and Plaintiffs, by the undersigned counsel,		
16	stipulate and agree as follows:		
17	1. The fact discovery cutoff date of December 8, 2011 set forth in the Order		
18	Modifying Pretrial Schedule for "Track One" Direct Action Plaintiff and State Attorney General		
19	Cases (MDL Dkt. No. 3110) is extended up to and including February 29, 2012, solely as to the		
20	deposition of PENAC.		
21	2. If disputes arise at the deposition, Plaintiffs will have five court days to move to		
22	compel further responses.		
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1	3. Unless expressly provided herein, nothing in this Stipulation and Order is intended	
2	to modify any other Order of the Court or the Special Master, nor does this order prevent any	
3	party from seeking further modifications to such orders.	
4		
5	Dated: December 6, 2011	
6	/s/ Nathanial J. Wood	
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25	Counsel for Plaintiffs Motorola Mobility, Inc. and Jaco Electronics, Inc.	
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2		/s/ Brendan P. Cullen
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11		Counsel for Defendants Philips Electronics North America Corporation and Koninklijke Philips
12		Electronics N.V.
13		
14	Pursuant to General Order 45, Part X-B, the filer attests that concurrence in the	
15	filing of this document has been obtain	ined from the other signatories.
16	16 IT IS SO ORDERED.	
17	II IS SO GIADEIAED.	
18	Dated: 12/12 , 2011	
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20		Suran Selston
21		Susan Illston, United States District Judge
22	DCACTIVE-16775344.1	
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