

1 Christopher B. Hockett (SBN 121539)
 Neal A. Potischman (SBN 254862)
 2 Sandra West (SBN 250389)
 Samantha H. Knox (SBN 254427)
 3 Micah G. Block (SBN 270712)
 DAVIS POLK & WARDWELL LLP
 4 1600 El Camino Real
 Menlo Park, California 94025
 5 Telephone: (650) 752-2000
 Facsimile: (650) 752-2111

6 Jonathan D. Martin (*pro hac vice*)
 7 Bradley R. Hansen (*pro hac vice*)
 DAVIS POLK & WARDWELL LLP
 8 450 Lexington Avenue
 New York, New York 10017
 9 Telephone: (212) 450-4000
 Facsimile: (212) 701-5800

10 *Attorneys for Defendants*
 11 *Chi Mei Corporation, Chimei Innolux*
Corporation (f/k/a Chi Mei Optoelectronics
 12 *Corp.), Chi Mei Optoelectronics USA, Inc.,*
CMO Japan Co., Ltd., Nexgen Mediatech, Inc.
 13 *and Nexgen Mediatech USA, Inc.*

14 [Additional Defendants and Counsel listed
 on signature page]

15
 16 **UNITED STATES DISTRICT COURT**
FOR THE NORTHERN DISTRICT OF CALIFORNIA
 17 **SAN FRANCISCO DIVISION**

18 IN RE: TFT-LCD (FLAT PANEL)) CASE NO. 3:10-cv-04945-SI
 19 ANTITRUST LITIGATION)
) MDL NO. 3:07-md-1827-SI

20 This Document Relates to Individual)
 Case No. 3:10-cv-04945-SI)

21 TARGET CORP., *et al.*,)
 22)
 Plaintiffs,)

STIPULATION AND ~~PROPOSED~~
ORDER REGARDING TIME TO
RESPOND TO FIRST AMENDED
COMPLAINT

23 v.)
 24)
 AU OPTRONICS CORPORATION, *et al.*,)
 25)
 Defendants.)

26 _____)

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1 The undersigned counsel, on behalf of their respective clients, hereby respectfully request
2 an extension of Defendants' deadline to respond to the first amended complaint filed by Plaintiffs
3 Target Corporation; Sears, Roebuck and Co.; Kmart Corporation; Old Comp Inc.; Good Guys, Inc.;
4 RadioShack Corporation; and Newegg Inc. on May 18, 2011, in the above-captioned litigation.

5 WHEREAS the undersigned Defendants jointly filed a motion to dismiss the first amended
6 complaint on July 5, 2011;

7 WHEREAS Plaintiffs filed a motion for leave to file a second amended complaint on
8 August 5, 2011, which Defendants opposed;

9 WHEREAS the Court entered an order granting in part and denying in part Defendants'
10 joint motion to dismiss the first amended complaint on August 24, 2011, which included a ruling
11 dismissing Plaintiffs' New York state law claims to the extent they arose prior to December 23,
12 1998 and the Nevada state law claims to the extent they arose prior to October 1, 1999 (the
13 "Dismissed Claims");

14 WHEREAS Defendants' current deadline to answer the first amended complaint is
15 September 7, 2011;

16 WHEREAS the Court is scheduled to hear oral argument on Plaintiffs' motion for leave to
17 file a second amended complaint on September 9, 2011;

18 WHEREAS Plaintiffs and Defendants agree that it would serve the interests of the parties to
19 extend Defendants' deadline to respond to the first amended complaint until after the Court rules on
20 Plaintiffs' pending motion for leave to file a second amended complaint.

21 THEREFORE, Plaintiffs and Defendants, by their respective counsel, stipulate and agree as
22 follows:

23 -- If the Court grants Plaintiffs' motion for leave to file a second amended complaint,
24 (a) Plaintiffs agree to dismiss the Dismissed Claims with prejudice from the second amended
25 complaint and (b) Defendants will answer the second amended complaint within twenty-one (21)
26 days of the Court's order on the motion for leave to amend.

1 -- If the Court denies Plaintiffs' motion for leave to file a second amended complaint,
2 Defendants will file their answer to Plaintiffs' first amended complaint within twenty-one (21) days
3 of the Court's order on the motion for leave to amend.

4 Dated: September 6, 2011

Respectfully submitted,

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6
7 By: /s/ Jerome A. Murphy
Jerome A. Murphy (*pro hac vice*)

8 Jason C. Murray (CA Bar No. 169806)
9 CROWELL & MORING LLP
10 515 South Flower St., 40th Floor
Los Angeles, CA 90071
11 Telephone: 213-443-5582
Facsimile: 213-622-2690
12 Email: jmurray@crowell.com

13 Jeffrey H. Howard (*pro hac vice*)
14 Jerome A. Murphy (*pro hac vice*)
CROWELL & MORING LLP
15 1001 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
16 Telephone: 202-624-2500
Facsimile: 202-628-5116
17 Email: jhoward@crowell.com
jmurphy@crowell.com

18 Kenneth L. Adams (*pro hac vice*)
19 R. Bruce Holcomb (*pro hac vice*)
20 Christopher T. Leonardo (*pro hac vice*)
ADAMS HOLCOMB LLP
21 1875 Eye Street NW
Washington, DC 20006
22 Telephone: 202-580-8822
23 Email: adams@adamsholcomb.com
holcomb@adamsholcomb.com
24 leonardo@adamsholcomb.com

25 *Attorneys for Plaintiffs Target Corporation; Sears,*
26 *Roebuck and Co.; Kmart Corporation; Old Comp*
27 *Inc.; Good Guys, Inc.; RadioShack Corporation; and*
28 *Newegg Inc.*

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DAVIS POLK & WARDWELL LLP

By: /s/ Christopher B. Hockett
Christopher B. Hockett (SBN 121539)

Christopher B. Hockett (SBN 121539)
Neal A. Potischman (SBN 254862)
Sandra West (SBN 250389)
Samantha H. Knox (SBN 254427)
Micah G. Block (SBN 270712)
1600 El Camino Real
Menlo Park, California 94025
(650) 752-2000 / (650) 752-2111
chris.hockett@davispolk.com
neal.potischman@davispolk.com
sandra.west@davispolk.com
samantha.knox@davispolk.com
micah.block@davispolk.com

Jonathan D. Martin (*pro hac vice*)
Bradley R. Hansen (*pro hac vice*)
DAVIS POLK & WARDWELL LLP
450 Lexington Avenue
New York, New York 10017
(212) 450-4000 / (212) 701-5800
jonathan.martin@davispolk.com
bradley.hansen@davispolk.com

*Attorneys for Defendants Chi Mei Corporation,
Chimei Innolux Corporation (f/k/a Chi Mei
Optoelectronics Corp.), Chi Mei Optoelectronics USA,
Inc., CMO Japan Co., Ltd., Nexgen Mediatech, Inc.
and Nexgen Mediatech USA, Inc.*

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NOSSAMAN LLP

By: /s/ Christopher A. Nedeau
Christopher A. Nedeau (SBN 81297)

Christopher A. Nedeau (SBN 81297)
Carl L. Blumenstein (SBN 124158)
Allison M. Dibley (SBN 213104)
50 California Street, 34th Floor
San Francisco, California 94111
(415) 398-3600 / (415) 398-2438
cnedeau@nossaman.com
cblumenstein@nossaman.com
adibley@nossaman.com

*Attorneys for Defendants AU Optronics Corporation
and AU Optronics Corporation America*

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Rachel S. Brass
Rachel S. Brass (SBN 219301)

Joel S. Sanders (SBN 107234)
Rachel S. Brass (SBN 219301)
Rebecca Justice Lazarus (SBN 227330)
555 Mission Street, Suite 3000
San Francisco, California 94105
(415) 393-8200 / (415) 393-8306
jsanders@gibsondunn.com
rbrass@gibsondunn.com
rjustice@gibsondunn.com

*Attorneys for Defendants Chunghwa Picture Tubes,
Ltd., and Tatum Company of America*

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MORRISON & FOERSTER LLP

By: /s/ Stephen P. Freccero
Stephen P. Freccero (SBN 131093)

Melvin R. Goldman (SBN 34097)
Stephen P. Freccero (SBN 131093)
Derek F. Foran (SBN 224569)
425 Market Street
San Francisco, California 94105
(415) 268-7000 / (415) 268-7522
mgoldman@mofo.com
sfreccero@mofo.com
dforan@mofo.com

Attorneys for Defendants Epson Imaging Devices Corporation and Epson Electronics America, Inc.

K&L GATES LLP

By: /s/ Ramona M. Emerson
Ramona M. Emerson (*pro hac vice*)

Hugh F. Bangasser (*pro hac vice*)
Ramona M. Emerson (*pro hac vice*)
Christopher M. Wyant (*pro hac vice*)
925 Fourth Avenue, Suite 2900
Seattle, Washington 98104
(206) 623-7580 / (206) 623-7022
hugh.bangasser@klgates.com
ramona.emerson@klgates.com
chris.wyant@klgates.com

Jeffrey L. Bornstein (SBN 99358)
K&L GATES LLP
Four Embarcadero Center, Suite 1200
San Francisco, California 94111
(415) 249-1059 / (415) 882-8200
jeff.bornstein@klgates.com

Attorneys for Defendant HannStar Display Corporation

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28

CLEARY GOTTLIEB STEEN & HAMILTON LLP

By: /s/ Michael R. Lazerwitz
Michael R. Lazerwitz (*pro hac vice*)

Michael R. Lazerwitz (*pro hac vice*)
Jeremy J. Calsyn (SBN 205062)
Lee F. Berger (SBN 222756)
One Liberty Plaza
New York, New York 10006
(212) 225-2000 / (212) 225-3999
mlazerwitz@cgsh.com
jcalsyn@cgsh.com
lberger@cgsh.com

*Attorneys for Defendants LG Display Co., Ltd., and
LG Display America, Inc.*

COVINGTON & BURLING LLP

By: /s/ Robert D. Wick
Robert D. Wick (*pro hac vice*)

Robert D. Wick (*pro hac vice*)
Neil K. Roman (*pro hac vice*)
Theodore P. Metzler (*pro hac vice*)
1201 Pennsylvania Ave. NW
Washington, D.C. 20004
(202) 662-6000
rwick@cov.com
nroman@cov.com
tmetzler@cov.com

*Attorneys for Defendants Samsung Electronics Co.,
Ltd., Samsung Semiconductor, Inc., and Samsung
Electronics America, Inc.*

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PILLSBURY WINTHROP SHAW PITTMAN LLP

By: /s/ Jacob R. Sorenson
Jacob R. Sorensen (SBN 209134)

John M. Grenfell (SBN 88500)
Jacob R. Sorensen (SBN 209134)
Fusae Nara (*pro hac vice*)
Andrew D. Lanphere (SBN 191479)
50 Fremont Street
San Francisco, California 94105
(415) 983-1000 / (415) 983-1200
john.grenfell@pillsburylaw.com
jake.sorensen@pillsburylaw.com
fusae.nara@pillsburylaw.com
andrew.lanphere@pillsburylaw.com

*Attorneys for Defendants Sharp Corporation and
Sharp Electronics Corporation*

WHITE & CASE LLP

By: /s/ John H. Chung
John H. Chung (*pro hac vice*)

John H. Chung (*pro hac vice*)
1155 Avenue of the Americas
New York, New York 10036
(212) 819-8200 / (212) 354-8113
jchung@whitecase.com

Christopher M. Curran (*pro hac vice*)
Kristen J. McAhren (*pro hac vice*)
WHITE & CASE LLP
701 Thirteenth Street, NW
Washington, D.C. 20005
(202) 626-3600 / (202) 639-9355
ccurran@whitecase.com
kmcahren@whitecase.com

*Attorneys for Defendants Toshiba America Electronic
Components, Inc., Toshiba Corporation, Toshiba
Mobile Display Co., Ltd., and Toshiba America
Information Systems, Inc.*

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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 all parties whose signatures are indicated by a "confirmed" signature (/s/) within this e-filed document.

Dated: September 6, 2011


Christopher B. Hockett /SDW
Christopher B. Hockett (SBN 121539)

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[PROPOSED] ORDER

Having considered the foregoing stipulation, and for good cause appearing,
IT IS SO ORDERED.

Dated: 9/7, 2011



The Honorable Susan Illston
United States District Judge