

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

6 *Attorneys for Defendants*
 7 LG DISPLAY AMERICA, INC.
 AND LG DISPLAY CO., LTD

8 [additional parties and counsel listed in signature block]

9
 10 **UNITED STATES DISTRICT COURT**
 11 **NORTHERN DISTRICT OF CALIFORNIA**
 12 **(SAN FRANCISCO DIVISION)**

13 IN RE TFT-LCD (FLAT PANEL)
 14 ANTITRUST LITIGATION

Master File No. 3:07-md-1827 SI, MQ

MDL No. 1827

No. C 10-5458 SI

**STIPULATION AND [~~PROPOSED~~]
 ORDER REGARDING DATE FOR
 DEFENDANTS' ANSWER TO SB
 LIQUIDATION TRUST'S FIRST
 AMENDED COMPLAINT**

17 This Document Relates to:
 18 Case No.: 10-cv-5458 SI
 19 SB LIQUIDATION TRUST,
 Plaintiff,
 20 vs.
 21 AU OPTRONICS CORPORATION, et
 22 al.,
 23 Defendants

24 WHEREAS plaintiff Syntax-Brilliant Liquidation Trust, filed a First Amended
 25 Complaint in the above-captioned case against Defendants AU Optronics Corporation, AU
 26 Optronics Corporation America, Inc., Chi Mei Corporation, Chi Mei Optoelectronics USA,
 27 Inc., CMO Japan Co., Ltd., Nexgen Mediatech, Inc., Nexgen Mediatech USA, Inc.,
 28 Chunghwa Picture Tubes Ltd., Tatung Company of America, Inc., Epson Imaging Devices

1 Corporation, Epson Electronics America, Inc., HannStar Display Corporation, LG Display
2 Co. Ltd., LG Display America, Inc., Samsung Electronics Co., Ltd., Samsung
3 Semiconductor, Inc., Samsung Electronics America, Inc., Sharp Corporation, Sharp
4 Electronics Corporation, Toshiba Corporation, Toshiba America Electronic Components,
5 Inc., Toshiba America Information Systems, Inc., Toshiba Mobile Display Co., Ltd., Hitachi
6 Displays, Ltd., Hitachi Electronic Devices (USA), Inc., and Hitachi, Ltd. (“Stipulating
7 Defendants”), on June 21, 2011;

8 WHEREAS the Court denied the Stipulating Defendants’ motion to dismiss the First
9 Amended Complaint on September 19, 2011;

10 WHEREAS the Stipulating Defendants’ deadline to respond to the First Amended
11 Complaint currently is October 3, 2011;

12 WHEREAS extending the Stipulating Defendants’ time to respond to the First
13 Amended Complaint will not alter the date of any other event or deadline already fixed by
14 the Court;

15 THEREFORE, SB Liquidation Trust and the Stipulating Defendants hereby agree:

16 1. The Stipulating Defendants’ deadline to answer to the First Amended
17 Complaint shall be October 25, 2011.

18
19 DATED: September 26, 2011

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

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

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

By: /s/ Christopher A. Nedeau
Christopher A. Nedeau
Carl L. Blumenstein
Allison Dibley
NOSSAMAN LLP
50 California Street, 34th Floor
San Francisco, CA 94111
(415) 398-3600 (Phone)
(415) 398-2438 (Facsimile)
cnedeau@nossaman.com

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

By: /s/ Christopher B. Hockett
Christopher B. Hockett (Bar No. 121539)
Neal A. Potischman (Bar No. 254862)
Sandra West (Bar No. 250389)
Samantha H. Knox (Bar No. 254427)
Micah G. Block (Bar No. 270712)
DAVIS POLK & WARDWELL LLP
1600 El Camino Real
Menlo Park, California 94025
(650) 752-2000 (Phone)
(650) 752-2111 (Facsimile)
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)
450 Lexington Avenue
New York, New York 10017
(212) 450-3000 (Phone)
(212) 701-5800 (Facsimile)
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., Nexgen
Mediatech, Inc., Nexgen Mediatech USA,
Inc., and CMO Japan Co., Ltd*

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

By: /s/ Derek F. Foran
Melvin R. Goldman (Bar No. 34097)
Stephen P. Freccero (Bar. No 131093)
Derek F. Foran (Bar No. 224569)
MORRISON & FOERSTER LLP
425 Market Street
San Francisco, CA 94105-2482
(415) 268-7000 (Phone)
(415) 268-7522 (Facsimile)
sfreccero@mofo.com

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

By: /s/ Ramona M. Emerson
Hugh F. Bangasser (*pro hac vice*)
Ramona M. Emerson (*pro hac vice*)
K&L GATES LLP
925 Fourth Avenue, Suite 2900
Seattle, WA 98004-1158
(206) 623-7580 (Phone)
(206) 623-7022 (Facsimile)
Ramona.Emerson@klgates.com

Jeffrey L. Bornstein (Bar No. 99358)
K&L GATES LLP
Four Embarcadero Center, Suite 1200
San Francisco, CA 94111
(415) 249-1059 (Phone)
(415) 882-8220 (Facsimile)

*Counsel for Defendant HannStar Display
Corporation*

By: /s/ Kent M. Roger
Kent M. Roger (Bar No. 95987)
Jennifer L. Calvert (Bar No. 258018)
MORGAN LEWIS & BOCKIUS LLP
One Market, Spear Street Tower
San Francisco, CA 94105-1126
(415) 442-1000 (Phone)
(415) 442-1001 (Facsimile)
croger@morganlewis.com

*Attorneys for Defendants Hitachi, Ltd.,
Hitachi Displays, Ltd. and Hitachi
Electronic Devices (USA), Inc.*

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

By: /s/ Robert Wick
Robert Wick (*pro hac vice*)
Neil Roman (*pro hac vice*)
Derek Ludwin (*pro hac vice*)
COVINGTON & BURLING LLP
1201 Pennsylvania Ave., NW
Washington, DC 20004
(202) 662-6000 (Phone)
(202) 662-6291 (Facsimile)
rwick@cov.com

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

By: /s/ John M. Grenfell
John M. Grenfell (Bar No. 88500)
Jacob R. Sorensen (Bar No. 209134)
Fusae Nara (*pro hac vice*)
Andrew D. Lanphere (Bar No. 191479)
PILLSBURY WINTHROP SHAW
PITTMAN LLP
50 Fremont Street
San Francisco, CA 94105
(415) 983-1000 (Phone)
(415) 983-1200 (Facsimile)
john.grenfell@pillsburylaw.com

*Attorneys for Defendants Sharp
Corporation and Sharp Electronics Corp.*

By: /s/ Rachel S. Brass
Joel S. Sanders (Bar No. 107234)
Rachel S. Brass (Bar No. 219301)
Rebecca Justice Lazarus (Bar No. 227330)
GIBSON, DUNN & CRUTCHER LLP
555 Mission Street, Suite 3000
San Francisco, CA 94105
(415) 393-8200 (Phone)
(415) 393-8306 (Facsimile)
rbrass@gibsondunn.com

*Counsel for Defendants Chunghwa Picture
Tubes, Ltd. and Tatung Company of
America*

1 By: /s/ John H. Chung
2 John H. Chung (*pro hac vice*)
3 WHITE & CASE LLP
4 1155 Avenue of the Americas
5 New York, NY 10036-2787
6 (212) 819-8200 (Phone)
7 (212) 354-8113 (Facsimile)
8 *jchung@whitecase.com*

9 Christopher M. Curran (*pro hac vice*)
10 Kristen J. McAhren (*pro hac vice*)
11 WHITE & CASE LLP
12 701 Thirteenth Street, NW
13 Washington, DC 20005-3807
14 (202) 626-3600 (Phone)
15 (202) 639-9355 (Facsimile)
16 *ccurran@whitecase.com*
17 *kmcahren@whitecase.com*

18 *Attorneys for Defendants Toshiba*
19 *Corporation, Toshiba Mobile Display Co.,*
20 *Ltd., Toshiba America Electronic*
21 *Components, Inc. and Toshiba America*
22 *Information Systems, Inc.*

23 By: /s/ Steve G. Sklaver
24 Marc M. Seltzer (Bar No. 54534)
25 Steve G. Sklaver (Bar No. 237612)
26 Ryan C. Kirckpatrick (Bar No.243824)
27 SUSMAN GODFREY LLP
28 1901 Avenue of the Stars, Suite 950
Los Angeles, California 90067-6029
Telephone: (310) 789-3100
Facsimile: (310)789-3150
mseltzer@susmangodfrey.com
Ssklaver@susmangodfrey.com
rkirkpatrick@susmangodfrey.com

Attorneys for Plaintiff SB Liquidation Trust

23 **Attestation:** The filer of this document attests that concurrence in the filing of this
24 document has been obtained from each of the other signatories.
25

26
27 By: /s/ Michael R. Lazerwitz
28 Michael R. Lazerwitz

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

[PROPOSED] ORDER

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



Dated: 9/27 , 2011

By: _____

Hon. Susan Illston
United States District Judge