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17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION

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

CASE NO. 3:10-CV-5625-SI

MDL NO. 3:07-MD-1827-SI

21 THIS DOCUMENT RELATES TO:

**STIPULATION OF EXTENSION OF TIME  
 TO RESPOND TO COMPLAINT, WAIVER  
 OF SERVICE, AND [PROPOSED] ORDER**

22 3:10-CV-5625-SI

Date Action Filed: December 10, 2010

23 ALFRED H. SIEGEL, AS TRUSTEE OF THE  
 24 CIRCUIT CITY STORES, INC. LIQUIDATING  
 TRUST,

25 Plaintiff,

26 vs.

27 AU OPTRONICS CORPORATION, et al.,

28 Defendants.

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MASTER FILE NO. 3:07-MD-1827 SI

CASE NO. 3:10-CV-5625 SI

STIPULATION OF EXTENSION OF TIME TO RESPOND TO COMPLAINT, WAIVER OF SERVICE, AND  
 [PROPOSED] ORDER

1 WHEREAS plaintiff Alfred H. Siegel, as Trustee of the Circuit City Stores, Inc. Liquidating  
2 Trust, on behalf of Circuit City Stores, Inc. and its affiliated companies ("Circuit City Trust"), filed a  
3 complaint in the above-captioned case against defendants AU Optronics Corporation, AU Optronics  
4 Corporation America, Chi Mei Corporation, Chi Mei Optoelectronics Corporation, Chi Mei  
5 Optoelectronics USA, Inc., CMO Japan Co. Ltd., Nexgen Mediatech, Inc., Nexgen Mediatech USA,  
6 Inc., Epson Imaging Devices Corporation, Epson Electronics America, Inc., HannStar Display  
7 Corporation, LG Display Co. Ltd., LG Display America, Inc., Samsung Electronics Co., Ltd., Samsung  
8 Semiconductor, Inc., Samsung Electronics America, Inc., Sharp Corporation, Sharp Electronics  
9 Corporation, Toshiba Corporation, Toshiba America Electronic Components, Inc., Toshiba Mobile  
10 Display Co., Ltd., Toshiba America Information Systems, Inc., Hitachi, Ltd., Hitachi Displays, Ltd., and  
11 Hitachi Electronic Devices (USA), Inc. (collectively "Stipulating Defendants"), and other defendants, on  
12 December 10, 2010 ("Complaint");

13 WHEREAS Circuit City Trust wishes to avoid the burden and expense of serving process on the  
14 Stipulating Defendants;

15 WHEREAS the Stipulating Defendants desire a reasonable amount of time to respond to the  
16 Complaint; and

17 WHEREAS Circuit City Trust and the Stipulating Defendants believe that proceeding on a  
18 unified response date will create efficiency for the Court and the parties;

19 THEREFORE, Circuit City Trust and the Stipulating Defendants hereby agree:

20 1. The Stipulating Defendants waive service of the Complaint under Federal Rule of Civil  
21 Procedure 4(d). This stipulation does not constitute a waiver by the Stipulating Defendants of any other  
22 substantive or procedural defense, including but not limited to the defenses of lack of personal or subject  
23 matter jurisdiction and improper venue.

24 2. The Stipulating Defendants' deadline to move to dismiss, answer, or otherwise respond to the  
25 Complaint will be 90 days from the execution of this stipulation.

1 DATED: February 2, 2011

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9 Pursuant to General Order 45, Part X-B, the filer attests that concurrence in the filing of this  
10 document has been obtained from the signatories to this document.

11 PURSUANT STIPULATION, IT IS SO ORDERED.

12   
13 By: \_\_\_\_\_  
14 Judge of the U.S. District Court, N.D. California

15 Date: 2/4/11