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 13 and AU OPTRONICS CORPORATION AMERICA

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15 UNITED STATES DISTRICT COURT
 16 NORTHERN DISTRICT OF CALIFORNIA

17 ALFRED H. SIEGEL, AS TRUSTEE OF THE
 18 CIRCUIT CITY STORES, INC. LIQUIDATING
 19 TRUST,

20 Plaintiff,

21 v.

22 AU OPTRONICS CORPORATION; AU
 23 OPTRONICS CORPORATION AMERICA,
 24 INC; CHI MEI CORPORATION; CHI MEI
 25 OPTOELECTRONICS CORPORATION; CHI
 26 MEI OPTOELECTRONICS USA, INC.; CMO
 27 JAPAN CO. LTD.; NEXGEN MEDIATECH,
 28 INC.; NEXGEN MEDIATECH USA, INC.;
 CHUNGHWA PICTURE TUBES LTD.;
 TATUNG COMPANY OF AMERICA, INC.;
 EPSON IMAGING DEVICES
 CORPORATION; EPSON ELECTRONICS
 AMERICA, INC.; HANNSTAR DISPLAY
 CORPORATION; LG DISPLAY CO. LTD.; LG
 DISPLAY AMERICA, INC.; SAMSUNG
 ELECTRONICS CO., LTD.; SAMSUNG
 SEMICONDUCTOR, INC.; SAMSUNG
 ELECTRONICS AMERICA, INC.; SHARP
 CORPORATION; SHARP ELECTRONICS;
 TOSHIBA CORPORATION;
 TOSHIBA AMERICA ELECTRONICS
 COMPONENTS, INC.;
 TOSHIBA MOBILE DISPLAY CO., LTD.;
 TOSHIBA AMERICA INFORMATION
 SYSTEMS, INC.; HITACHI, LTD.; HITACHI

CASE NO. 10-cv-5625 SI

Master File No. 07-cv-1827 SI

MDL No. 1827 SI

**STIPULATION AND ~~PROPOSED~~ ORDER
 EXTENDING TIME TO RESPOND TO
 COMPLAINT**

1 DISPLAYS, LTD.; AND HITACHI
2 ELECTRONIC DEVICES (USA), INC.,

3 Defendants.

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

15
16 WHEREAS, Circuit City Trust and all Stipulating Defendants except Chunghwa Picture Tubes,
17 Ltd. and Tatung Company of America entered into a Stipulation of Extension of Time to Respond to
18 Complaint and Waiver of Service dated February 2, 2011, which provided that those defendants thereto
19 would accept service of the Complaint filed by Circuit City Trust and would have ninety (90) days in
20 which to respond to the Complaint (the "Initial Stipulation"). The Initial Stipulation was entered by the
21 Court on February 4, 2011 (Document 2410 in 3:07-md-01827).

22
23 WHEREAS, Circuit City Trust and Tatung Company of America entered into a Stipulation of
24 Extension of Time for Defendant Tatung Company of America to Respond to Complaint dated February
25 23, 2011, which provided that Tatung would have the same time period as provided in the Initial
26 Stipulation in which to respond to the Complaint filed by Circuit City Trust (the "Tatung Stipulation").
27 The Tatung Stipulation was entered by the Court on February 23, 2011 (Document 18 in 3:10-cv-
28 05625).

1 WHEREAS, on March 24, 2011, the Court entered an Order Granting Plaintiff's Motion for
2 Order to Serve Defendant Chunghwa Picture Tubes Through Its U.S. Counsel (Document 2584 in 3:07-
3 md-01827). Following that order, Circuit City Trust entered into a Stipulation of Extension of Time for
4 Defendant Chunghwa Picture Tubes to Respond to Complaint dated March 25, 2011, which provided
5 that Chunghwa would have the same time period as provided in the Initial Stipulation in which to
6 respond to the Complaint filed by Circuit City Trust (the "Chunghwa Stipulation"). The Chunghwa
7 Stipulation was entered by the Court on March 28, 2011 (Document 26 in 3:10-cv-05625).
8

9 WHEREAS, Circuit City Trust desires to file an Amended Complaint, a copy of which is
10 attached hereto as Exhibit A.

11 WHEREAS, in order to avoid potentially redundant motion practice, briefing and/or responsive
12 pleadings, Circuit City Trust and Stipulating Defendants agree and so stipulate that the Amended
13 Complaint should be filed and the Stipulating Defendants should have thirty (30) days from the date on
14 which it is filed to move to dismiss, answer or otherwise respond to the Amended Complaint. Circuit
15 City Trust and the Stipulating Defendants believe that proceeding in this way will create efficiency for
16 the Court and all parties.

17 THEREFORE, Circuit City Trust and Stipulating Defendants hereby agree:

- 18 1. The Amended Complaint of Circuit City Trust should be filed and accepted for filing by
19 the Court.
- 20 2. Defendants will have thirty (30) days from the date on which the Amended Complaint is
21 filed and accepted for filing by the Court in which to move to dismiss, answer or otherwise respond to
22 the Amended Complaint.

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24 Plaintiff and Stipulating Defendants further and jointly respectfully request that the Court enter
25 this stipulation as an order.

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1 Dated: May 3, 2011

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SO ORDERED:



Honorable Susan Illston

5/4/11

Date Entered

1 Dated: May 3, 2011

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