

1 Harrison J. Frahn IV (SBN 206822)
 hfrahn@stblaw.com
 2 SIMPSON THACHER & BARTLETT LLP
 2550 Hanover Street
 3 Palo Alto, CA 94304
 4 Telephone: (650) 251-5000
 Facsimile: (650) 251-5002
 5

6 *Attorneys for Defendants*
Chi Mei Optoelectronics Corporation,
 7 *Chi Mei Optoelectronics USA, Inc., and*
CMO Japan Co., Ltd.
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9 UNITED STATES DISTRICT COURT
 10 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 11 SAN FRANCISCO DIVISION
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 14 IN RE: TFT-LCD (FLAT PANEL)
 ANTITRUST LITIGATION
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CASE NO. 3:11-cv-00711-SI
 MDL NO. 3:07-md-1827-SI

16 This Document Relates to Individual
 Case No. 3:11-cv-00711-SI
 17

**STIPULATION AND [~~PROPOSED~~]
 ORDER REGARDING TIME TO
 RESPOND TO AMENDED COMPLAINT**

18 THE STATE OF NEW YORK,

19 Plaintiff,

20 vs.

21 AU OPTRONICS CORPORATION, *et al.*,

22 Defendants.
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1 The undersigned counsel, on behalf of their respective clients, hereby respectfully request
2 an extension of the deadline for Defendants Chimei Innolux Corporation (f/k/a Chi Mei
3 Optoelectronics Corporation), Chi Mei Optoelectronics USA, Inc., and CMO Japan Co., Ltd.
4 (collectively, the “Chi Mei Defendants”), and Defendants Hitachi, Ltd., Hitachi Displays, Ltd., and
5 Hitachi Electronic Devices (USA), Inc. (collectively, the “Hitachi Defendants”), to respond to the
6 amended complaint filed by Plaintiff State of New York on March 15, 2011, in the above-captioned
7 litigation (the “Amended Complaint”).

8 WHEREAS the Chi Mei Defendants and Hitachi Defendants, jointly with other Defendants
9 in this action, filed a motion to dismiss the Amended Complaint on May 5, 2011;

10 WHEREAS the Court entered an order granting in part and denying in part Defendants’
11 joint motion to dismiss the Amended Complaint on August 9, 2011 (the “August 9, 2011 Order”);

12 WHEREAS on August 25, 2011, the Court entered an order extending Defendants’ deadline
13 to answer the Amended Complaint to September 14, 2011;

14 WHEREAS on September 14, 2011, the Court entered an order extending Defendants’
15 deadline to answer the Amended Complaint to October 25, 2011;

16 WHEREAS on October 21, 2011, Plaintiff, the Chi Mei Defendants, and the Hitachi
17 Defendants filed a joint stipulation to extend the Chi Mei and Hitachi Defendants’ deadline to
18 answer the Amended Complaint to November 22, 2011;

19 WHEREAS on October 26, 2011, the Court entered an order modifying the pretrial and trial
20 schedule in the above-captioned litigation;

21 WHEREAS on November 15, 2011, the Court entered an order (i) granting Plaintiff’s
22 motion for leave to file a motion for reconsideration and (ii) granting in part and denying in part
23 reconsideration of the August 9, 2011 Order.

24 WHEREAS Plaintiff State of New York and the Chi Mei Defendants have agreed to a
25 settlement in principle of the above-captioned litigation;

26 WHEREAS Plaintiff State of New York and the Hitachi Defendants have agreed to a
27 settlement in principle of the above-captioned litigation, subject to board approval;

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1 WHEREAS the parties would benefit from additional time to continue to negotiate the
2 terms of that settlement;

3 WHEREAS further extending the time for the Chi Mei Defendants and Hitachi Defendants
4 to answer the Amended Complaint would not alter the date of any other event or deadline already
5 fixed by the Court;

6 THEREFORE, Plaintiff State of New York and the Chi Mei Defendants and Hitachi
7 Defendants, by their respective counsel, stipulate and agree as follows:

8 The Chi Mei Defendants and Hitachi Defendants will have until December 9, 2011 to
9 answer the Amended Complaint.

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11 Dated: November 22, 2011

Respectfully submitted,

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13 ERIC T. SCHNEIDERMAN
Attorney General of the State of New York

14 By: /s/ Richard L. Schwartz
15 Richard L. Schwartz

16 Richard L. Schwartz*
17 Acting Bureau Chief, Antitrust Bureau
18 Amy McFarlane*
Assistant Attorney General
19 120 Broadway, 26th Floor
New York, New York 10271
20 (212) 416-8282 (voice)
(212) 416-6015 (fax)
21 Richard.Schwartz@ag.ny.gov

22 *Attorneys for Plaintiff State of New York*

23 * Automatic *Pro Hac Vice* Admission Pursuant to Pretrial
24 Order No. 1, Dated July 3, 2007 (Waiving Civil L.R. 11-3)

25 SIMPSON THACHER & BARTLETT LLP

26 By: /s/ Harrison J. Frahn IV
27 Harrison J. Frahn IV

28 Harrison J. Frahn IV (SBN 206822)

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hfrah@stblaw.com
SIMPSON THACHER & BARTLETT LLP
2550 Hanover Street
Palo Alto, CA 94304
Telephone: (650) 251-5000
Facsimile: (650) 251-5002

*Attorneys for Defendants
Chi Mei Optoelectronics Corporation,
Chi Mei Optoelectronics USA, Inc., and
CMO Japan Co., Ltd.*

MORGAN LEWIS & BOCKIUS LLP

By: /s/ Kent M. Roger
Kent M. Roger (SBN 95987)

Kent M. Roger (SBN 95987)
One Market, Spear Street Tower
San Francisco, California 94105
Telephone: (415) 442-1001
Facsimile: (415) 442-1001

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

1 Pursuant to General Order 45, Part X-B, the filer attests that concurrence in the filing of this
2 document has been obtained from all parties whose signatures are indicated by a “confirmed”
3 signature (/s/) within this e-filed document.

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Dated: November 22, 2011


/s/ Harrison J. Frahn IV
Harrison J. Frahn IV (SBN 206822)

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[PROPOSED] ORDER

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

Dated: 11/22, 2011

By 
HON. SUSAN ILLSTON
UNITED STATES DISTRICT JUDGE