

BAKER & HOSTETLER LLP
ATTORNEYS AT LAW
CLEVELAND

1 Paul P. Eyre
Ernest E. Vargo
2 Michael E. Mumford
BAKER HOSTETLER LLP
3 PNC Center
1900 East Ninth Street, Suite 3200
4 Cleveland, OH 44114-3482
Telephone: (216) 621-0200
5 Facsimile: (216) 696-0740
Email: peyre@bakerlaw.com
6 evargo@bakerlaw.com
mmumford@bakerlaw.com

7
8 Tracy L. Cole
BAKER HOSTETLER LLP
45 Rockefeller Plaza
9 11th Floor
New York, NY 10111
10 Telephone: (212) 589-4228
Facsimile: (212) 589-4201
11 Email: tcole@bakerlaw.com

12 Attorneys for Defendant
Mitsui & Co. (Taiwan), Ltd.

14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN FRANCISCO DIVISION

<p>17 IN RE: TFT-LCD (FLAT PANEL) ANTITRUST LITIGATION</p> <p>18 This Document Relates to Individual Case 19 No. C 11-0829 SI</p>	<p>Master File No. 3:07-md-1827 SI</p> <p>MDL No. 1827</p>
<p>20 METROPCS WIRELESS, INC.,</p> <p>21 Plaintiff,</p> <p>22 v.</p> <p>23 AU OPTRONICS CORPORATION, et al.,</p> <p>24 Defendants.</p>	<p>Individual Case No. C 11-0829 SI</p> <p>STIPULATION OF EXTENSION OF TIME TO RESPOND TO COMPLAINT, WAIVER OF SERVICE, AND [PROPOSED] ORDER</p> <p>Clerk's Action Required</p>

25 WHEREAS, plaintiff MetroPCS Wireless, Inc. ("MetroPCS") filed a complaint in the
26 above-captioned case against AU Optronics Corporation, AU Optronics Corporation America,
27 Chi Mei Optoelectronics Corporation, Chi Mei Optoelectronics USA, Inc., CMO Japan Co., Ltd.,
28 Epson Electronics America, Inc., Epson Imaging Devices Corporation, Hannstar Display

1 Corporation, Hitachi Electronic Devices (USA), Inc., Hitachi, Ltd., Hitachi Displays, Ltd., Mitsui
2 & Co. (Taiwan), Ltd., Sanyo Consumer Electronics Co., Ltd., Sharp Corporation, Sharp
3 Electronics Corporation, Tatung Company of America, Inc., Toshiba America Electronic
4 Components, Inc., Toshiba America Information Systems, Inc., Toshiba Corporation, and
5 Toshiba Mobile Display Co., Ltd. (collectively, “Stipulating Defendants”), among other
6 defendants, on December 17, 2010 (“Complaint”);

7 WHEREAS, MetroPCS wishes to avoid the burden and expense of serving process on the
8 Stipulating Defendants;

9 WHEREAS, the Stipulating Defendants desire a reasonable amount of time to respond to
10 the Complaint; and

11 WHEREAS, MetroPCS and the Stipulating Defendants believe that proceeding on a
12 unified response date will create efficiency for the Court and the parties.

13 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among the
14 undersigned counsel, on behalf of their respective clients, MetroPCS, on the one hand, and the
15 Stipulating Defendants, on the other hand, as follows:

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

20 2. The Stipulating Defendants’ deadline to move to dismiss, answer, or otherwise
21 respond to the Complaint will be ninety (90) days from the execution of this stipulation. In
22 computing this time period, Rule 6 of the Federal Rules of Civil Procedure shall govern.

23
24
25
26
27
28

1 DATED: February 25, 2011

2

3 By: /s/ Christopher A. Nedeau
4 Christopher A. Nedeau (CA Bar No. 81297)
5 Carl L. Blumenstein (CA Bar No. 124158)
6 Katharine Chao (CA Bar No. 247571)
7 NOSSAMAN LLP
8 50 California Street, 34th Floor
9 San Francisco, California 94111-4799
10 (415) 398-3600 (Phone)
11 (415) 398-2438 (Facsimile)
12 *cnedeau@nossaman.com*
13 *cblumenstein@nossaman.com*
14 *kchao@nossaman.com*

15 *Counsel for Defendants AU Optronics Corporation and AU Optronics Corporation America*

16

17 By: /s/ Adam Raviv
18 Nathan L. Walker (CA Bar No. 206128)
19 WILMER CUTLER PICKERING HALE AND DORR LLP
20 950 Page Mill Road
21 Palo Alto, California 94304
22 (650) 858-6000 (Phone)
23 (650) 858-6100 (Facsimile)
24 *Nathan.Walker@wilmerhale.com*

25 Steven Cherry (*pro hac vice*)
26 Adam Raviv (*pro hac vice*)
27 WILMER CUTLER PICKERING HALE AND DOOR LLP
28 1875 Pennsylvania Avenue, N.W.
Washington, D.C. 20006
(202) 663-6000 (Phone)
(202) 663-6363 (Facsimile)
Steven.Cherry@wilmerhale.com
Adam.Raviv@wilmerhale.com

*Counsel for Chi Mei Optoelectronics Corporation, Chi Mei Optoelectronics USA, Inc.,
CMO Japan Co., Ltd.*

29

30

31

32

33

34

35

1 By: /s/ Stephen P. Freccero
Melvin R. Goldman (CA Bar No. 34097)
2 Stephen P. Freccero (CA Bar No. 131093)
Derek F. Foran (CA Bar No. 224569)
3 MORRISON & FOERSTER LLP
425 Market Street
4 San Francisco, CA 94105-2482
(415) 268-7000 (Phone)
5 (415) 268-7522 (Facsimile)
mgoldman@mofo.com
6 *sfreccero@mofo.com*
dforan@mofo.com

7
8 *Counsel for Defendants Epson Electronics America, Inc. and Epson Imaging Devices Corporation*

9
10 By: /s/ Ramona M. Emerson
Hugh F. Bangasser (*pro hac vice*)
11 Ramona M. Emerson (*pro hac vice*)
Christopher M. Wyant (*pro hac vice*)
12 Jeffrey L. Bornstein (CA Bar No. 99358)
K&L GATES LLP
13 925 Fourth Avenue, Suite 2900
Seattle, WA 98104
14 (206) 623-7580 (Phone)
15 (206) 370-6371 (Facsimile)
romana.emerson@klgates.com

16
17 *Counsel for Defendant Hannstar Display Corporation*

18 By: /s/ Kent M. Roger
Kent M. Roger (CA Bar No. 95987)
19 Michelle Kim-Szrom (CA Bar No. 252901)
Jennifer L. Calvert (CA Bar No. 258018)
20 MORGAN LEWIS & BOCKIUS LLP
One Market, Spear Street Tower
21 San Francisco, CA 94105-1126
(415) 442-1000 (Phone)
22 (415) 442-1001 (Facsimile)
croger@morganlewis.com
23 *mkim-szrom@morganlewis.com*
24 *jennifer.calvert@morganlewis.com*

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

26
27
28

1 By: /s/ Michael E. Mumford
Paul P. Eyre
2 Ernest E. Vargo
Michael E. Mumford
3 BAKER & HOSTETTLER LLP
PNC Center
4 1900 East Ninth Street, Suite 3200
Cleveland, Ohio 44114-3482
5 (216) 621-0200 (Phone)
(216) 696-0740 (Facsimile)
6 *peyre@bakerlaw.com*
evargo@bakerlaw.com
7 *mmumford@bakerlaw.com*

8 *Counsel for Defendant Mitsui & Co. (Taiwan), Ltd.*

9
10 By: /s/ Allison A. Davis
Allison A. Davis (CA Bar No. 139203)
11 DAVIS WRIGHT TREMAINE LLP
505 Montgomery Street, Suite 800
12 San Francisco, CA 94111-6533
(415) 276-6500 (Phone)
13 (415) 276-6599 (Facsimile)
allisondavis@dwt.com

14 *Counsel for Defendant Sanyo Consumer Electronics Co., Ltd.*

15
16 By: /s/ Jacob R. Sorenson
John M. Grenfell (CA Bar No. 88500)
17 Jacob R. Sorensen (CA Bar No. 209134)
Fusae Nara (*pro hac vice*)
18 PILLSBURY WINTHROP SHAW PITTMAN LLP
50 Fremont Street
19 San Francisco, CA 94105
(415) 983-1000 (Phone)
20 (415) 983-1200 (Facsimile)
john.grenfell@pillsburylaw.com
21 *jake.sorensen@pillsburylaw.com*
fusae.nara@pillsburylaw.com

22 *Counsel for Defendants Sharp Corporation and Sharp Electronics Corporation*

23
24
25
26
27
28

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/ Rachel S. Brass
Rachel S. Brass
GIBSON, DUNN & CRUTCHER LLP
555 Mission Street, Suite 3000
San Francisco, CA 94105-2933
(415) 393-8200 (Phone)
(415) 393-8306 (Facsimile)
rbrass@gibsondunn.com

Counsel for Defendant Tatum Company of America, Inc.

By: /s/ John H. Chung
John H. Chung
WHITE & CASE LLP
1155 Avenue of the Americas
New York, NY 10036-2787
(212) 819-8200 (Phone)
(212) 354-8113 (Facsimile)
jchung@whitecase.com

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

By: /s/ Philip J. Iovieno
William A. Isaacson
BOIES, SCHILLER & FLEXNER LLP
5301 Wisconsin Avenue, N.W., Suite 800
Washington, D.C. 20015
(202) 237-2727 (Phone)
(202) 237-6131 (Facsimile)
wisaacson@bsfllp.com

Philip J. Iovieno
Anne M. Nardacci
BOIES, SCHILLER & FLEXNER LLP
10 North Pearl Street, 4th Floor
Albany, NY 12207
(518) 434-0600 (Phone)
(518) 434-0665 (Facsimile)
piovieno@bsfllp.com
anardacci@bsfllp.com

Counsel for Plaintiff MetroPCS Wireless, 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

[PROPOSED] ORDER

IT IS SO STIPULATED.

DATED this 28th day of February, 2011.

By: 
Hon. SUSAN ILLSTON