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 PANASONIC CORPORATION OF NORTH AMERICA
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UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

DR. DAN OLIVER and JEANNIE OLIVER,
 Plaintiffs, on their own behalves
 and on behalf of all others
 similarly situated,
 v.
 SD-3C, LLC; PANASONIC CORP.;
 PANASONIC CORP. OF NORTH AMERICA;
 TOSHIBA CORP.; TOSHIBA AMERICA
 ELECTRONIC COMPONENTS, INC.; and
 SANDISK CORP.,
 Defendants.

No. CV-11-1260 JSW

**JOINT STIPULATION AND
 [PROPOSED] ORDER TO STAY
 DISCOVERY PURSUANT TO LOCAL
 RULE 6-2(A)**

1 Pursuant to Local Rule 6-2(a), the indirect purchaser plaintiffs (collectively “Plaintiffs”) and
2 Defendants SD-3C, LLC, Panasonic Corporation, Panasonic Corporation of North America,
3 Toshiba Corporation, Toshiba America Electronic Components, Inc., and SanDisk Corporation
4 (collectively, “Defendants”), hereby stipulate and agree, subject to the approval of the Court, that:

5 (1.) All discovery in this action shall be stayed through the ninetieth (90th) day after the
6 Court enters an Order resolving the pending motion to dismiss in the related action of *Samsung*
7 *Electronics Co., Ltd. v. Panasonic Corporation, et al.*, No. 3:10-cv-03098-JSW (“*Samsung*”),
8 unless Plaintiffs file an amended complaint within those 90 days, in which case discovery shall be
9 stayed through the ninetieth (90th) day after the amended complaint is filed;

10 (2.) Notwithstanding the above, this stay of discovery shall expire if (1) other plaintiffs
11 file class actions making similar allegations and Defendants fail to obtain a similar stay of
12 proceedings and discovery, or (2) there has been no ruling on the pending motion to dismiss in the
13 *Samsung* action by July 30, 2011;

14 (3.) No party shall serve requests for discovery until the stay has expired;

15 (4.) The parties shall not be required to serve initial disclosures, pursuant to Federal Rule
16 of Civil Procedure 26(a), until the stay of discovery has expired;

17 (5.) This Stipulation is made without prejudice to any party’s right to move to extend the
18 stay of discovery;

19 (6.) The parties stipulate and request that the date presently set for the Case Management
20 Conference be vacated, and the parties further agree and stipulate that they will confer and propose
21 to the Court a new date for the Case Management Conference and associated discovery and ADR
22 obligations after the Court resolves the pending motion to dismiss in the related *Samsung* action.

23 (7.) This Stipulation applies to this proceeding only.
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1 Dated: April 5, 2011
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Respectfully submitted,
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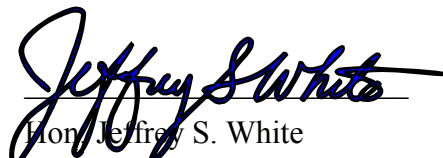
*Attorneys for Defendant
SanDisk Corporation*

*Pursuant to General Order No. 45 § X.B., the filer attests that concurrence
in the filing of this document has been obtained from the above signatories.*

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: April 6, 2011



Hon. Jeffrey S. White
United States District Court Judge