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 HITACHI, LTD., HITACHI DISPLAYS, LTD., and
 7 HITACHI ELECTRONIC DEVICES (USA), INC.

8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10 SAN FRANCISCO DIVISION

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

Case No. 3:11-CV-2591 SI
 MDL No. 1827 SI

13 This Document Relates To:
 14 T-MOBILE U.S.A., INC.,
 15 Plaintiff,
 16 vs.
 17 AU OPTRONICS CORPORATION, *et al.*,
 18 Defendants.

**ANSWER OF HITACHI, LTD., HITACHI
 DISPLAYS, LTD., AND HITACHI
 ELECTRONIC DEVICES (USA), INC. TO
 T-MOBILE U.S.A., INC.'S AMENDED
 COMPLAINT**

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CASE NO. 3:11-cv-2591 SI; MDL NO. 1827

ANSWER OF HITACHI, LTD., HITACHI DISPLAYS, LTD., AND HITACHI ELECTRONIC DEVICES (USA), INC. TO
 T-MOBILE U.S.A., INC.'S FIRST AMENDED COMPLAINT

1 Defendants Hitachi, Ltd., Hitachi Displays, Ltd., and Hitachi Electronic Devices (USA),
2 Inc. (collectively “the Hitachi defendants”) through their undersigned counsel of record, answer
3 and respond to T-Mobile U.S.A., Inc.’s Amended Complaint for Damages and Injunctive Relief
4 (“Complaint”).

5 As used in this Answer, and in the interest of brevity, the term “Hitachi Defendants”
6 means defendants Hitachi, Ltd., Hitachi Displays, Ltd., and Hitachi Electronic Devices (USA),
7 Inc. and the phrase deny or denies “for want of information or belief” means that the answering
8 defendants are without knowledge or information sufficient to form a belief as to the truth of an
9 averment of the Complaint, and deny that averment on that basis. The Hitachi defendants deny
10 all allegations in the Complaint (including headings and captions) not specifically admitted in this
11 answer.

12 1. The Hitachi defendants deny, for want of information or belief, each of the
13 averments of Paragraph 1 of the Complaint.

14 2. The averments of Paragraph 2 of the Complaint consist of statements so overbroad
15 and ambiguous as to be incapable of response. To the extent the averments of Paragraph 2 may
16 be deemed to require a response, the Hitachi defendants deny each of the averments of Paragraph
17 2 of the Complaint as it pertains to the Hitachi defendants. To the extent the averments of
18 Paragraph 2 of the Complaint do not pertain to the Hitachi defendants, the Hitachi defendants
19 deny, for want of information or belief, the averments of Paragraph 2 of the Complaint.

20 3. The averments in the first and second sentences of Paragraph 3 of the Complaint
21 appear to be prefatory only, and not ones calling for any response. To the extent the averments
22 in the first and second sentences of Paragraph 3 may be deemed to require a response, the Hitachi
23 defendants deny each of the averments in the first and second sentences of Paragraph 3 of the
24 Complaint, except admit that certain mobile wireless handsets during the relevant period included
25 thin film transistor LCD panels, color super-twist nematic LCD panels and/or monochrome super-
26 twist nematic LCD panels. The Hitachi defendants deny the remainder of the averments of
27 Paragraph 3 of the Complaint as it pertains to the Hitachi defendants and to the extent the
28 remainder of the averments do not pertain to the Hitachi defendants, the Hitachi defendants deny,

CASE NO. 3:11-cv-2591 SI; MDL NO. 1827

ANSWER OF HITACHI, LTD., HITACHI DISPLAYS, LTD., AND HITACHI ELECTRONIC DEVICES (USA), INC. TO
T-MOBILE U.S.A., INC.’S FIRST AMENDED COMPLAINT

1 for want of information or belief, the remainder of the averments of Paragraph 3 of the
2 Complaint.

3 4. The Hitachi defendants deny, for want of information or belief, each of the
4 averments in the first and second sentences of Paragraph 4 of the Complaint. The averments in
5 the third sentence of Paragraph 4 of the Complaint consist of statements so overbroad and
6 ambiguous as to be incapable of response. To the extent the averments in the third sentence of
7 Paragraph 4 may be deemed to require a response, the Hitachi defendants deny each of the
8 averments in the third sentence of Paragraph 4 of the Complaint as it pertains to the Hitachi
9 defendants and to the extent the averments do not pertain to the Hitachi defendants, the Hitachi
10 defendants deny, for want of information or belief, the averments in the third sentence of
11 Paragraph 4 of the Complaint. The averments in the fourth sentence of Paragraph 4 consist of
12 conclusions of law to which no response is required. To the extent that the averments in the
13 fourth sentence of Paragraph 4 may be deemed to require a response, the Hitachi defendants deny
14 each of the averments in the fourth sentence of Paragraph 4 of the Complaint, as it pertains to the
15 Hitachi defendants and to the extent the averments do not pertain to the Hitachi defendants, the
16 Hitachi defendants deny, for want of information or belief, the averments of Paragraph 4 of the
17 Complaint.

18 5. The averments of Paragraph 5 of the Complaint are not directed at the Hitachi
19 defendants and therefore, no response is required. To the extent the averments of Paragraph 5 of
20 the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny, for want of
21 information or belief, the averments of Paragraph 5 of the Complaint.

22 6. The Hitachi defendants deny each of the averments in the first and second
23 sentences of Paragraph 6 of the Complaint as they pertain to the Hitachi defendants and to the
24 extent the averments in the first and second sentences of Paragraph 6 do not pertain to the Hitachi
25 defendants, the Hitachi defendants deny, for want of information or belief, the averments of the
26 first and second sentences of Paragraph 6 of the Complaint. The remainder of the averments of
27 Paragraph 6 of the Complaint are not directed at the Hitachi defendants and therefore, no
28 response is required. To the extent the remainder of the averments of Paragraph 6 of the

1 Complaint are directed at the Hitachi defendants, the Hitachi defendants deny, for want of
2 information or belief, the remainder of the averments of Paragraph 6 of the Complaint.

3 7. The Hitachi defendants deny each of the averments of Paragraph 7 of the
4 Complaint as it pertains to the Hitachi defendants. To the extent the averments of Paragraph 7 of
5 the Complaint do not pertain to the Hitachi defendants, the Hitachi defendants deny, for want of
6 information or belief, the averments of Paragraph 7 of the Complaint.

7 8. The Hitachi defendants deny each of the averments in the first and second
8 sentences of Paragraph 8 of the Complaint as it pertains to the Hitachi defendants and to the
9 extent the averments do not pertain to the Hitachi defendants, the Hitachi defendants deny, for
10 want of information or belief, the averments in the first and second sentences of Paragraph 8 of
11 the Complaint. The averments in the third sentence of Paragraph 8 of the Complaint consist of
12 conclusions of law to which no response is required. To the extent that the third sentence of
13 Paragraph 8 may be deemed to require a response, the Hitachi defendants deny each of the
14 averments in the third sentence of Paragraph 8 of the Complaint.

15 9. The Hitachi defendants deny each of the averments of Paragraph 9 of the
16 Complaint, except admit that plaintiff purports to bring this action under the statutes identified in
17 Paragraph 9 of the Complaint.

18 10. The Hitachi defendants deny each of the averments of Paragraph 10 of the
19 Complaint, except admit that plaintiff purports to bring this action under the statutes identified in
20 Paragraph 10 of the Complaint.

21 11. The Hitachi defendants deny each of the averments of Paragraph 11 of the
22 Complaint, except admit that plaintiff purports to bring this action under the statutes identified in
23 Paragraph 11 of the Complaint.

24 12. The averments of Paragraph 12 consist of conclusions of law to which no response
25 is required. To the extent the averments of Paragraph 12 may be deemed to require a response,
26 the Hitachi defendants deny each of the averments of Paragraph 12 of the Complaint, except
27 admit that plaintiffs purport to bring this action under the statutes and state antitrust, unfair
28 competition, and consumer protection laws identified in Paragraph 12 of the Complaint.

1 13. The averments in the first, second, and third sentences of Paragraph 13 consist of
2 conclusions of law to which no response is required. To the extent that the averments in the first,
3 second and, third sentences of Paragraph 13 may be deemed to require a response, the Hitachi
4 defendants deny each of the averments in the first, second, and third sentences of Paragraph 13 of
5 the Complaint as it pertains to the Hitachi defendants, and to the extent the averments do not
6 pertain to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief,
7 the averments in the first, second, and third sentences of Paragraph 13 of the Complaint. The
8 Hitachi defendants deny the remainder of the averments of Paragraph 13 of the Complaint as it
9 pertains to the Hitachi defendants and to the extent the remainder of the averments do not pertain
10 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
11 remainder of the averments of Paragraph 13 of the Complaint.

12 14. The averments of Paragraph 14 of the Complaint consist of conclusions of law to
13 which no response is required. To the extent that Paragraph 14 may be deemed to require a
14 response, the Hitachi defendants deny each of the averments of Paragraph 14 of the Complaint,
15 except admit that plaintiffs purport to lay venue in this District under the statutes identified in
16 Paragraph 14 of the Complaint.

17 15. The averments of Paragraph 15 of the Complaint appear to be prefatory only and
18 consist of conclusions of law to which no response is required. To the extent that Paragraph 15
19 may be deemed to require a response, the Hitachi defendants deny each of the averments of
20 Paragraph 15 of the Complaint, except admit that this case was consolidated with Case No. M:07-
21 cv-1827 SI for all pretrial proceedings.

22 16. The averments of Paragraph 16 of the Complaint appear to be prefatory only and
23 consist of conclusions of law to which no response is required. To the extent that Paragraph 16
24 may be deemed to require a response, the Hitachi defendants admit that this case was
25 consolidated with the cases pending in MDL No. 1827 for pretrial proceedings and that Plaintiff
26 contends it should be returned to the Western District of Washington for trial.

27 17. The averments in the first, second, and third sentences of Paragraph 17 of the
28 Complaint appear to be prefatory only, and not ones calling for any response. To the extent that

1 the averments in the first, second, and third sentences of Paragraph 17 may be deemed to require
2 a response, the Hitachi defendants admit each of these averments. The averments in the fourth
3 sentence of Paragraph 17 of the Complaint are definitional only, and do not call for any response.

4 18. The averments in the first sentence of Paragraph 18 of the Complaint appear to be
5 prefatory only, and not ones calling for any response. To the extent the averments in the first
6 sentence of Paragraph 18 may be deemed to require a response, the Hitachi defendants deny each
7 of the averments in the first sentence of Paragraph 18 of the Complaint, except admit that hand-
8 held devices during the relevant period included TFT-LCD Panels, CSTN Panels, and MSTN
9 Panels. The Hitachi defendants deny the remainder of the averments of Paragraph 18 of the
10 Complaint as it pertains to the Hitachi defendants and to the extent the remainder of the
11 averments do not pertain to the Hitachi defendants, the Hitachi defendants deny, for want of
12 information or belief, the remainder of the averments of Paragraph 18 of the Complaint.

13 19. The averments of Paragraph 19 of the Complaint are definitional only, and not
14 ones calling for any response.

15 20. The averments of Paragraph 20 of the Complaint are definitional only, and not
16 ones calling for any response.

17 21. The averments of Paragraph 21 of the Complaint are definitional only, and not
18 ones calling for any response.

19 22. The Hitachi defendants deny, for want of information or belief, each of the
20 averments in the first, second, and third sentences of Paragraph 22 of the Complaint. The
21 remainder of the averments of Paragraph 22 consists of conclusions of law to which no response
22 is required. To the extent the remainder of the averments of Paragraph 22 may be deemed to
23 require a response, the Hitachi defendants deny the remainder of the averments of Paragraph 22
24 of the Complaint.

25 23. The Hitachi defendants deny, for want of information or belief, each of the
26 averments in the first sentence of Paragraph 23 of the Complaint. The averments in the second
27 and third sentences of Paragraph 23 of the Complaint consist of conclusions of law to which no
28 response is required. To the extent the averments in the second and third sentences of Paragraph

1 23 may be deemed to require a response, the Hitachi defendants deny each of the averments in the
2 second and third sentences of Paragraph 23. The averments in the fourth sentence of Paragraph
3 23 of the Complaint are definitional only, and do not call for any response.

4 24. The Hitachi defendants deny, for want of information or belief, each of the
5 averments in the first sentence of Paragraph 24 of the Complaint. The Hitachi defendants deny
6 each of the averments of in the second sentence of Paragraph 24 of the Complaint as it pertains to
7 the Hitachi defendants. To the extent the averments in the second sentence of Paragraph 24 of the
8 Complaint do not pertain to the Hitachi defendants, the Hitachi defendants deny, for want of
9 information or belief, the averments in the second sentence of Paragraph 24 of the Complaint.
10 The averments in the third sentence of Paragraph 24 of the Complaint consist of conclusions of
11 law to which no response is required. To the extent that the averments in the third sentence of
12 Paragraph 24 may be deemed to require a response, the Hitachi defendants deny each of the
13 averments in the third sentence of Paragraph 24 of the Complaint.

14 25. The Hitachi defendants deny, for want of information or belief, each of the
15 averments in Paragraph 25 of the Complaint.

16 26. The Hitachi defendants deny, for want of information or belief, each of the
17 averments in Paragraph 26 of the Complaint.

18 27. The Hitachi defendants deny each of the averments of Paragraph 27 of the
19 Complaint.

20 28. The Hitachi defendants deny, for want of information or belief, each of the
21 averments in Paragraph 28 of the Complaint.

22 29. The averments of Paragraph 29 of the Complaint are not directed at the Hitachi
23 defendants and therefore, no response is required.

24 30. The averments of Paragraph 30 of the Complaint are not directed at the Hitachi
25 defendants and therefore, no response is required.

26 31. The averments of Paragraph 31 of the Complaint are not directed at the Hitachi
27 defendants and therefore, no response is required.

28 32. The averments of Paragraph 32 of the Complaint are not directed at the Hitachi

1 defendants and therefore, no response is required.

2 33. The averments of Paragraph 33 of the Complaint are not directed at the Hitachi
3 defendants and therefore, no response is required.

4 34. The averments of Paragraph 34 of the Complaint are not directed at the Hitachi
5 defendants and therefore, no response is required.

6 35. The averments of Paragraph 35 of the Complaint are not directed at the Hitachi
7 defendants and therefore, no response is required.

8 36. The averments of Paragraph 36 of the Complaint are not directed at the Hitachi
9 defendants and therefore, no response is required.

10 37. The averments of Paragraph 37 of the Complaint are not directed at the Hitachi
11 defendants and therefore, no response is required.

12 38. The averments of Paragraph 38 of the Complaint are not directed at the Hitachi
13 defendants and therefore, no response is required.

14 39. The averments of Paragraph 39 of the Complaint are not directed at the Hitachi
15 defendants and therefore, no response is required.

16 40. The averments of Paragraph 40 of the Complaint are not directed at the Hitachi
17 defendants and therefore, no response is required.

18 41. The averments of Paragraph 41 of the Complaint are not directed at the Hitachi
19 defendants and therefore, no response is required.

20 42. The averments of Paragraph 42 of the Complaint are not directed at the Hitachi
21 defendants and therefore, no response is required.

22 43. The averments of Paragraph 43 of the Complaint are not directed at the Hitachi
23 defendants and therefore, no response is required.

24 44. The averments of Paragraph 44 of the Complaint are not directed at the Hitachi
25 defendants and therefore, no response is required.

26 45. The averments of Paragraph 45 of the Complaint are not directed at the Hitachi
27 defendants and therefore, no response is required.

28 46. The averments of Paragraph 46 of the Complaint are not directed at the Hitachi

1 defendants and therefore, no response is required.

2 47. The averments of Paragraph 47 of the Complaint are not directed at the Hitachi
3 defendants and therefore, no response is required.

4 48. The averments of Paragraph 48 of the Complaint are not directed at the Hitachi
5 defendants and therefore, no response is required.

6 49. The Hitachi defendants admit that Hitachi, Ltd. is a Japanese company with its
7 principal place of business at 6-6, Marunouchi 1-chome, Chiyoda-ku, Tokyo, 100-8280, Japan.
8 The Hitachi defendants admit that, at the beginning of certain times between January 1, 1996 and
9 December 11, 2006 (the "Relevant Period") and until October 2002, Hitachi, Ltd. engaged in the
10 manufacture and sale of certain types of LCD panels. The Hitachi defendants also admit that
11 Hitachi, Ltd. sold and distributed certain products containing LCD Panels to customers in the
12 United States from 1998 to 2000. The Hitachi defendants deny the remainder of the averments of
13 Paragraph 49 of the Complaint.

14 50. The Hitachi defendants deny that Hitachi Displays, Ltd. has its principal place of
15 business at AKS Bldg. 5F, 6-2 Kanda Neribeicho 3, Chiyoda-ku, Tokyo, 101-0022, Japan, but
16 admit that Hitachi Displays, Ltd. is a Japanese company with its principal place of business at
17 3300, Hayano, Mobara-shi, Chiba-ken, 297-8622, Japan. The Hitachi defendants further admit
18 that from October 2002 through the end of the Relevant Period, Hitachi Displays, Ltd. sold and
19 distributed LCD modules to certain customers in the United States. The Hitachi defendants deny
20 the remainder of the averments of Paragraph 50 of the Complaint.

21 51. The Hitachi defendants admit that, during the Relevant Period, Hitachi Electronic
22 Devices (USA), Inc. sold and distributed certain types of LCD panels to customers in the United
23 States. The Hitachi defendants deny that Hitachi Electronic Devices (USA), Inc.'s principal place
24 of business is located at 575 Mauldin Road, Greenville, South Carolina, but admit that Hitachi
25 Electronic Devices (USA), Inc. is a Delaware corporation with its principal place of business at
26 208 Fairforest Way, Greenville, South Carolina. The Hitachi defendants deny the remainder of
27 the averments of Paragraph 51 of the Complaint.

28 52. Paragraph 52 of the Complaint is definitional only, and does not call for any

1 response.

2 53. The averments of Paragraph 53 of the Complaint are not directed at the Hitachi
3 defendants and therefore, no response is required.

4 54. The averments of Paragraph 54 of the Complaint are not directed at the Hitachi
5 defendants and therefore, no response is required.

6 55. The averments of Paragraph 55 of the Complaint are not directed at the Hitachi
7 defendants and therefore, no response is required.

8 56. The averments of Paragraph 56 of the Complaint are not directed at the Hitachi
9 defendants and therefore, no response is required.

10 57. The averments of Paragraph 57 of the Complaint are not directed at the Hitachi
11 defendants and therefore, no response is required.

12 58. The averments of Paragraph 58 of the Complaint are not directed at the Hitachi
13 defendants and therefore, no response is required.

14 59. The averments of Paragraph 59 of the Complaint are not directed at the Hitachi
15 defendants and therefore, no response is required.

16 60. The averments of Paragraph 60 of the Complaint are not directed at the Hitachi
17 defendants and therefore, no response is required.

18 61. The averments of Paragraph 61 of the Complaint are not directed at the Hitachi
19 defendants and therefore, no response is required.

20 62. The averments of Paragraph 62 of the Complaint are not directed at the Hitachi
21 defendants and therefore, no response is required.

22 63. The averments of Paragraph 63 of the Complaint are not directed at the Hitachi
23 defendants and therefore, no response is required.

24 64. The averments of Paragraph 64 of the Complaint are not directed at the Hitachi
25 defendants and therefore, no response is required.

26 65. The averments of Paragraph 65 of the Complaint are not directed at the Hitachi
27 defendants and therefore, no response is required.

28 66. The averments in the first, third, fourth, and fifth sentences of Paragraph 66 of the
9 CASE NO. 3:11-cv-2591SI; MDL NO. 1827

1 Complaint are not directed at the Hitachi defendants and therefore, no response is required. To
2 the extent the averments in the first, third, fourth, and fifth sentences of Paragraph 66 of the
3 Complaint may be deemed to require a response, the Hitachi defendants deny, for want of
4 information or belief, the averments in the first, third, fourth, and fifth sentences of Paragraph 66
5 of the Complaint. The Hitachi defendants deny the remainder of the averments of Paragraph 66
6 as it pertains to the Hitachi defendants, except admit that Samsung SDI purchased TFT-LCD cells
7 from Hitachi Displays, Ltd. To the extent the remainder of the averments do not pertain to the
8 Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the remainder
9 of the averments of Paragraph 66 of the Complaint.

10 67. The averments of Paragraph 67 of the Complaint are not directed at the Hitachi
11 defendants and therefore, no response is required.

12 68. The averments of Paragraph 68 of the Complaint are not directed at the Hitachi
13 defendants and therefore, no response is required.

14 69. The averments of Paragraph 69 of the Complaint are not directed at the Hitachi
15 defendants and therefore, no response is required.

16 70. The averments of Paragraph 70 of the Complaint are not directed at the Hitachi
17 defendants and therefore, no response is required.

18 71. The averments of Paragraph 71 of the Complaint are not directed at the Hitachi
19 defendants and therefore, no response is required.

20 72. The averments of Paragraph 72 of the Complaint are not directed at the Hitachi
21 defendants and therefore, no response is required.

22 73. The averments of Paragraph 73 of the Complaint are not directed at the Hitachi
23 defendants and therefore, no response is required.

24 74. The averments of Paragraph 74 of the Complaint are not directed at the Hitachi
25 defendants and therefore, no response is required.

26 75. The averments of Paragraph 75 of the Complaint are not directed at the Hitachi
27 defendants and therefore, no response is required.

28 76. The averments of Paragraph 76 of the Complaint are not directed at the Hitachi

1 defendants and therefore, no response is required.

2 77. The averments of Paragraph 77 of the Complaint are not directed at the Hitachi
3 defendants and therefore, no response is required.

4 78. The averments of Paragraph 78 of the Complaint are not directed at the Hitachi
5 defendants and therefore, no response is required.

6 79. The averments of Paragraph 79 of the Complaint are not directed at the Hitachi
7 defendants and therefore, no response is required.

8 80. The averments of Paragraph 80 of the Complaint consist of statements so
9 overbroad and ambiguous as to be incapable of response. To the extent the averments of
10 Paragraph 80 may be deemed to require a response, the Hitachi defendants deny each of the
11 averments of Paragraph 80 of the Complaint as it pertains to the Hitachi defendants and to the
12 extent the averments do not pertain to the Hitachi defendants, the Hitachi defendants deny, for
13 want of information or belief, the averments of Paragraph 80 of the Complaint.

14 81. The Hitachi defendants deny each of the averments of Paragraph 81 of the
15 Complaint as it pertains to the Hitachi defendants. To the extent the averments of Paragraph 81
16 of the Complaint do not pertain to the Hitachi defendants, the Hitachi defendants deny, for want
17 of information or belief, the averments of Paragraph 81 of the Complaint.

18 82. The Hitachi defendants deny each of the averments of Paragraph 82 of the
19 Complaint as it pertains to the Hitachi defendants. To the extent the averments of Paragraph 82
20 of the Complaint do not pertain to the Hitachi defendants, the Hitachi defendants deny, for want
21 of information or belief, the averments of Paragraph 82 of the Complaint.

22 83. The averments of Paragraph 83 of the Complaint consist of statements so
23 overbroad and ambiguous as to be incapable of response. To the extent the averments of
24 Paragraph 83 may be deemed to require a response, the Hitachi defendants deny each of the
25 averments of Paragraph 83 of the Complaint as it pertains to the Hitachi defendants and to the
26 extent the averments do not pertain to the Hitachi defendants, the Hitachi defendants deny, for
27 want of information or belief, the averments of Paragraph 83 of the Complaint.

28 84. The Hitachi defendants deny each of the averments of Paragraph 84 of the

1 Complaint as it pertains to the Hitachi defendants. To the extent the averments of Paragraph 84
2 of the Complaint do not pertain to the Hitachi defendants, the Hitachi defendants deny, for want
3 of information or belief, the averments of Paragraph 84 of the Complaint.

4 85. The averments of Paragraph 85 of the Complaint appear to be prefatory only, and
5 not ones calling for any response. To the extent the averments of Paragraph 85 may be deemed
6 to require a response, the Hitachi defendants deny each of the averments of Paragraph 85 of the
7 Complaint, except admit that LCD panels are components of certain products, including certain
8 mobile wireless handsets, televisions, computer monitors, notebook computers, and digital
9 cameras

10 86. The averments of Paragraph 86 of the Complaint consist of statements so
11 overbroad and ambiguous as to be incapable of response. To the extent the averments of
12 Paragraph 86 may be deemed to require a response, the Hitachi defendants deny each of the
13 averments of Paragraph 86 of the Complaint.

14 87. The averments of Paragraph 87 of the Complaint consist of statements so
15 overbroad and ambiguous as to be incapable of response. To the extent the averments of
16 Paragraph 87 may be deemed to require a response, the Hitachi defendants deny, for want of
17 information or belief, each of the averments of Paragraph 87 of the Complaint.

18 88. The averments of Paragraph 88 of the Complaint consist of statements so
19 overbroad and ambiguous as to be incapable of response. To the extent that Paragraph 88 may be
20 deemed to require a response, the Hitachi defendants deny each of the averments of Paragraph 88
21 of the Complaint.

22 89. The averments of Paragraph 89 of the Complaint consist of statements so
23 overbroad and ambiguous as to be incapable of response. To the extent the averments of
24 Paragraph 89 may be deemed to require a response, the Hitachi defendants deny each of the
25 averments of Paragraph 89 of the Complaint.

26 90. The averments of Paragraph 90 consist of statements so overbroad and ambiguous
27 as to be incapable of response. To the extent the averments of Paragraph 90 may be deemed to
28 require a response, the Hitachi defendants deny each of the averments of Paragraph 90 of the

1 Complaint.

2 91. The Hitachi defendants deny each of the averments of Paragraph 91 of the
3 Complaint.

4 92. The Hitachi defendants deny each of the averments of Paragraph 92 of the
5 Complaint as it pertains to the Hitachi defendants. To the extent the averments of Paragraph 92
6 of the Complaint do not pertain to the Hitachi defendants, the Hitachi defendants deny, for want
7 of information or belief, the averments of Paragraph 92 of the Complaint.

8 93. The averments of Paragraph 93 of the Complaint consist of statements so
9 overbroad and ambiguous as to be incapable of response. To the extent the averments of
10 Paragraph 93 may be deemed to require a response, the Hitachi defendants deny each of the
11 averments of Paragraph 93 of the Complaint.

12 94. The averments of Paragraph 94 of the Complaint consist of statements so
13 overbroad and ambiguous as to be incapable of response. To the extent the averments of
14 Paragraph 94 may be deemed to require a response, the Hitachi defendants deny each of the
15 averments of Paragraph 94 of the Complaint.

16 95. The Hitachi defendants admit that IPS Alpha was formed by Hitachi Displays,
17 Ltd., Toshiba Corporation, and Matsushita Electric Industrial Co., Ltd. in or around 2004. The
18 Hitachi defendants deny, for want of information or belief, the remainder of the averments of
19 Paragraph 95 of the Complaint.

20 96. The Hitachi defendants deny each of the averments of Paragraph 96 of the
21 Complaint as it pertains to the Hitachi defendants. To the extent the averments of Paragraph 96
22 of the Complaint do not pertain to the Hitachi defendants, the Hitachi defendants deny, for want
23 of information or belief, the averments of Paragraph 96 of the Complaint.

24 97. The Hitachi defendants deny each of the averments of Paragraph 97 of the
25 Complaint as it pertains to the Hitachi defendants. To the extent the averments of Paragraph 97
26 of the Complaint do not pertain to the Hitachi defendants, the Hitachi defendants deny, for want
27 of information or belief, the averments of Paragraph 97 of the Complaint.

28 98. The averments in the first sentence of Paragraph 98 of the Complaint appear to be

1 prefatory only, and not ones calling for any response. To the extent the averments in the first
2 sentence of Paragraph 98 may be deemed to require a response, the Hitachi defendants deny, for
3 want of information or belief, each of the averments in the first sentence of Paragraph 98. The
4 averments in the second sentence of Paragraph 98 of the Complaint consist of statements so
5 overbroad and ambiguous as to be incapable of response. To the extent the averments in the
6 second sentence of Paragraph 98 may be deemed to require a response, the Hitachi defendants
7 deny each of the averments in the second sentence of Paragraph 98 as it pertains to the Hitachi
8 defendants and, to the extent the averments do not pertain to the Hitachi defendants, the Hitachi
9 defendants deny, for want of information or belief, the averments in the second sentence of
10 Paragraph 98 of the Complaint. The averments in the third sentence of Paragraph 98 of the
11 Complaint are not directed at the Hitachi defendants and purport to be derived from a 2003
12 internal Samsung presentation and therefore, no response is required. To the extent the averments
13 in the third sentence of Paragraph 98 of the Complaint require a response, the Hitachi defendants
14 respond that the 2003 internal Samsung presentation speaks for itself and the Hitachi defendants
15 deny, for want of information or belief, the averments in the third sentence of Paragraph 98 of the
16 Complaint.

17 99. The averments in the first and fourth sentences of Paragraph 99 of the Complaint
18 consist of statements so overbroad and ambiguous as to be incapable of response. To the extent
19 the averments in the first and fourth sentences of Paragraph 99 may be deemed to require a
20 response, the Hitachi defendants deny each of the averments in the first and fourth sentences of
21 Paragraph 99 of the Complaint as it pertains to the Hitachi defendants, and to the extent the
22 averments do not pertain to the Hitachi defendants, the Hitachi defendants deny, for want of
23 information or belief, the averments in the first and fourth sentences of Paragraph 99 of the
24 Complaint. The averments in the second and third sentences of Paragraph 99 of the Complaint
25 are not directed at the Hitachi defendants and purport to be derived from unidentified documents
26 and/or testimony, which speak for themselves, and therefore, no response is required. To the
27 extent the averments in the second and third sentences of Paragraph 99 of the Complaint may be
28 deemed to require a response, the Hitachi defendants deny each of the averments in the second

1 and third sentences of Paragraph 99 as it pertains to the Hitachi defendants, and to the extent the
2 averments do not pertain to the Hitachi defendants, the Hitachi defendants deny, for want of
3 information or belief, the averments in the second and third sentences of Paragraph 99 of the
4 Complaint.

5 100. The Hitachi defendants deny the averments of Paragraph 100 of the Complaint as
6 they pertain to the Hitachi defendants. To the extent the averments of Paragraph 100 of the
7 Complaint do not pertain to the Hitachi defendants, the Hitachi defendants deny, for want of
8 information or belief, the averments of Paragraph 100 of the Complaint.

9 101. The averments of Paragraph 101 of the Complaint are not directed at the Hitachi
10 defendants and therefore, no response is required. To the extent the averments of Paragraph 101
11 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
12 averments of Paragraph 101 as it pertains to the Hitachi defendants and, to the extent the
13 averments do not pertain to the Hitachi defendants, the Hitachi defendants deny, for want of
14 information or belief, the averments of Paragraph 101 of the Complaint.

15 102. The averments of Paragraph 102 of the Complaint are not directed at the Hitachi
16 defendants, and therefore no response is required. To the extent the averments of Paragraph 102
17 of the Complaint may be deemed to require a response, the Hitachi defendants deny each of the
18 averments of Paragraph 102 as it pertains to the Hitachi defendants, and to the extent the
19 averments do not pertain to the Hitachi defendants, the Hitachi defendants deny, for want of
20 information or belief, the averments of Paragraph 102 of the Complaint.

21 103. The averments in the first, second, and third sentences of Paragraph 103 of the
22 Complaint are not directed at the Hitachi defendants and therefore, no response is required. To the
23 extent the averments in the first, second, and third sentences of Paragraph 103 of the Complaint
24 are directed at the Hitachi defendants, the Hitachi defendants deny, for want of information or
25 belief, the averments in the first, second and third sentences of Paragraph 103 of the Complaint.
26 The remainder of the averments of Paragraph 103 of the Complaint contain statements so
27 overbroad and ambiguous as to be incapable of a response. To the extent the remainder of the
28 averments of Paragraph 103 may be deemed to require a response, the Hitachi defendants deny

1 the remainder of averments of Paragraph 103 of the Complaint.

2 104. The averments in the first sentence of Paragraph 104 of the Complaint consist of
3 statements so overbroad and ambiguous as to be incapable of a response. To the extent the
4 averments in the first sentence of Paragraph 104 of the Complaint may be deemed to require a
5 response, the Hitachi defendants deny the averments in the first sentence of Paragraph 104 as they
6 pertain to the Hitachi defendants and, to the extent the averments do not pertain to the Hitachi
7 defendants, the Hitachi defendants deny, for want of information or belief, the averments in the
8 first sentence of Paragraph 104 of the Complaint. The remainder of the averments of Paragraph
9 104 of the Complaint purport to be derived from deposition testimony and/or documents and thus,
10 no response is required. To the extent the remainder of the averments of Paragraph 104 of the
11 Complaint may be deemed to require a response, the Hitachi defendants respond that the
12 deposition testimony and documents speak for themselves and therefore the Hitachi defendants
13 deny, for want of information or belief, the remainder of the averments of Paragraph 104 of the
14 Complaint.

15 105. The averments of Paragraph 105 of the Complaint are not directed at the Hitachi
16 defendants and therefore, no response is required. To the extent the averments of Paragraph 105
17 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
18 averments of Paragraph 105 as it pertains to the Hitachi defendants and, to the extent the
19 averments do not pertain to the Hitachi defendants, the Hitachi defendants deny, for want of
20 information or belief, the averments of Paragraph 105 of the Complaint.

21 106. The Hitachi defendants deny the averments of Paragraph 106 of the Complaint as
22 they pertain to the Hitachi defendants. To the extent the averments of Paragraph 106 of the
23 Complaint do not pertain to the Hitachi defendants, the Hitachi defendants deny, for want of
24 information or belief, the averments of Paragraph 106 of the Complaint.

25 107. The averments of Paragraph 107 of the Complaint are not directed at the Hitachi
26 defendants and therefore, no response is required. To the extent the averments of Paragraph 107
27 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
28 averments of Paragraph 107 as it pertains to the Hitachi defendants and, to the extent the

1 averments do not pertain to the Hitachi defendants, the Hitachi defendants deny, for want of
2 information or belief, the averments of Paragraph 107 of the Complaint.

3 108. The averments of Paragraph 108 of the Complaint are not directed at the Hitachi
4 defendants and therefore, no response is required. To the extent the averments of Paragraph 108
5 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
6 averments of Paragraph 108 as it pertains to the Hitachi defendants and, to the extent the
7 averments do not pertain to the Hitachi defendants, the Hitachi defendants deny, for want of
8 information or belief, the averments of Paragraph 108 of the Complaint.

9 109. The averments in the first sentence of Paragraph 109 of the Complaint consist of
10 statements so overbroad and ambiguous as to be incapable of response. To the extent the
11 averments in the first sentence of Paragraph 109 of the Complaint may be deemed to require a
12 response, the Hitachi defendants deny, for want of information or belief, each of the averments in
13 the first sentence of Paragraph 109 of the Complaint. The averments in the second sentence of
14 Paragraph 109 of the Complaint purport to be derived from a March 29, 2001 email, and therefore
15 no response is required. To the extent the averments in the second sentence of Paragraph 109 of
16 the Complaint may be deemed to require a response, the Hitachi defendants respond that the
17 referenced email speaks for itself and deny, for want of information or belief, the averments in the
18 second sentence of Paragraph 109 of the Complaint.

19 110. The Hitachi defendants deny each of the averments in the first sentence of
20 Paragraph 110 of the Complaint as it pertains to the Hitachi defendants. To the extent the
21 averments in the first sentence of Paragraph 110 of the Complaint do not pertain to the Hitachi
22 defendants, the Hitachi defendants deny, for want of information or belief, the averments in the
23 first sentence of Paragraph 110 of the Complaint. The remainder of the averments in Paragraph
24 110 of the Complaint is not directed at the Hitachi defendants and therefore, no response is
25 required. To the extent the remainder of the averments of Paragraph 110 of the Complaint are
26 directed at the Hitachi defendants, the Hitachi defendants deny each of the averments as it
27 pertains to the Hitachi defendants and, to the extent the averments do not pertain to the Hitachi
28 defendants, the Hitachi defendants deny, for want of information or belief, the remainder of the

1 averments of Paragraph 110 of the Complaint.

2 111. The averments of Paragraph 111 of the Complaint are not directed at the Hitachi
3 defendants and therefore, no response is required. To the extent the averments of Paragraph 111
4 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
5 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
6 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
7 averments of Paragraph 111 of the Complaint.

8 112. The Hitachi defendants deny each of the averments in the first and second
9 sentences of Paragraph 112 of the Complaint as it pertains to the Hitachi defendants, except admit
10 that certain customers coordinated and hosted events to which they invited multiple suppliers of
11 LCDs to attend. To the extent the averments in the first and second sentences of Paragraph 112
12 of the Complaint do not pertain to the Hitachi defendants, the Hitachi defendants deny, for want
13 of information or belief, the averments in the first and second sentences of Paragraph 112 of the
14 Complaint. The averments in the third sentence of Paragraph 112 of the Complaint are not
15 directed at the Hitachi defendants and therefore, no response is required. To the extent the
16 averments in the third sentence of Paragraph 112 of the Complaint are directed at the Hitachi
17 defendants, the Hitachi defendants deny each of the averments as it pertains to the Hitachi
18 defendants and, to the extent the averments do not pertain to the Hitachi defendants, the Hitachi
19 defendants deny, for want of information or belief, the averments in the third sentence of
20 Paragraph 112 of the Complaint.

21 113. The averments of Paragraph 113 of the Complaint are not directed at the Hitachi
22 defendants and therefore, no response is required. To the extent the averments of Paragraph 113
23 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
24 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
25 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
26 averments of Paragraph 113 of the Complaint.

27 114. The averments of Paragraph 114 of the Complaint are not directed at the Hitachi
28 defendants and therefore, no response is required. To the extent the averments of Paragraph 114

1 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
2 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
3 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
4 averments of Paragraph 114 of the Complaint.

5 115. The averments of Paragraph 115 of the Complaint are not directed at the Hitachi
6 defendants and therefore, no response is required. To the extent the averments of Paragraph 115
7 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
8 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
9 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
10 averments of Paragraph 115 of the Complaint.

11 116. The averments of Paragraph 116 of the Complaint are not directed at the Hitachi
12 defendants and therefore, no response is required. To the extent the averments of Paragraph 116
13 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
14 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
15 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
16 averments of Paragraph 116 of the Complaint.

17 117. The averments of Paragraph 117 of the Complaint are not directed at the Hitachi
18 defendants and therefore, no response is required. To the extent the averments of Paragraph 117
19 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
20 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
21 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
22 averments of Paragraph 117 of the Complaint.

23 118. The averments of Paragraph 118 of the Complaint are not directed at the Hitachi
24 defendants and therefore, no response is required. To the extent the averments of Paragraph 118
25 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
26 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
27 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
28 averments of Paragraph 118 of the Complaint.

1 119. The averments of Paragraph 119 of the Complaint are not directed at the Hitachi
2 defendants and therefore, no response is required. To the extent the averments of Paragraph 119
3 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
4 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
5 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
6 averments of Paragraph 119 of the Complaint.

7 120. The averments of Paragraph 120 of the Complaint are not directed at the Hitachi
8 defendants and therefore, no response is required. To the extent the averments of Paragraph 120
9 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
10 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
11 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
12 averments of Paragraph 120 of the Complaint.

13 121. The averments of Paragraph 121 of the Complaint are not directed at the Hitachi
14 defendants and therefore, no response is required. To the extent the averments of Paragraph 121
15 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
16 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
17 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
18 averments of Paragraph 121 of the Complaint.

19 122. The averments of Paragraph 122 of the Complaint are not directed at the Hitachi
20 defendants and therefore, no response is required. To the extent the averments of Paragraph 122
21 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
22 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
23 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
24 averments of Paragraph 122 of the Complaint.

25 123. The averments of Paragraph 123 of the Complaint are not directed at the Hitachi
26 defendants and therefore, no response is required. To the extent the averments of Paragraph 123
27 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
28 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain

1 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
2 averments of Paragraph 123 of the Complaint.

3 124. The Hitachi defendants deny each of the averments of Paragraph 124 of the
4 Complaint as it pertains to the Hitachi defendants. To the extent the averments of Paragraph 124
5 of the Complaint do not pertain to the Hitachi defendants, the Hitachi defendants deny, for want
6 of information or belief, the averments of Paragraph 124 of the Complaint.

7 125. The averments of Paragraph 125 of the Complaint are not directed at the Hitachi
8 defendants and therefore, no response is required. To the extent the averments of Paragraph 125
9 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
10 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
11 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
12 averments of Paragraph 125 of the Complaint.

13 126. The averments of Paragraph 126 of the Complaint are not directed at the Hitachi
14 defendants and therefore, no response is required. To the extent the averments of Paragraph 126
15 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
16 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
17 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
18 averments of Paragraph 126 of the Complaint.

19 127. The averments in the first sentence of Paragraph 127 of the Complaint consist of
20 statements so overbroad and ambiguous as to be incapable of response. To the extent the
21 averments in the first sentence of Paragraph 127 may be deemed to require a response, the Hitachi
22 defendants deny each of the averments in the first sentence of Paragraph 127 of the Complaint as
23 it pertains to the Hitachi defendants and, to the extent the averments do not pertain to the Hitachi
24 defendants, the Hitachi defendants deny, for want of information or belief, the averments of
25 Paragraph 127 of the Complaint. The remainder of the averments of Paragraph 127 of the
26 Complaint is not directed at the Hitachi defendants and therefore, no response is required. To the
27 extent the remainder of the averments of Paragraph 127 of the Complaint is directed at the
28 Hitachi defendants, the Hitachi defendants deny each of the averments as it pertains to the Hitachi

1 defendants and, to the extent the averments do not pertain to the Hitachi defendants, the Hitachi
2 defendants deny, for want of information or belief, the remainder of the averments of Paragraph
3 127 of the Complaint.

4 128. The averments of Paragraph 128 of the Complaint are not directed at the Hitachi
5 defendants and therefore, no response is required. To the extent the averments of Paragraph 128
6 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
7 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
8 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
9 averments of Paragraph 128 of the Complaint.

10 129. The averments of Paragraph 129 of the Complaint are not directed at the Hitachi
11 defendants and therefore, no response is required. To the extent the averments of Paragraph 129
12 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
13 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
14 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
15 averments of Paragraph 129 of the Complaint.

16 130. The averments of Paragraph 130 of the Complaint are not directed at the Hitachi
17 defendants and therefore, no response is required. To the extent the averments of Paragraph 130
18 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
19 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
20 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
21 averments of Paragraph 130 of the Complaint.

22 131. The averments of Paragraph 131 of the Complaint are not directed at the Hitachi
23 defendants and therefore, no response is required. To the extent the averments of Paragraph 131
24 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
25 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
26 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
27 averments of Paragraph 131 of the Complaint.

28 132. The averments of Paragraph 132 of the Complaint are not directed at the Hitachi

1 defendants and therefore, no response is required. To the extent the averments of Paragraph 132
2 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
3 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
4 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
5 averments of Paragraph 132 of the Complaint.

6 133. The averments of Paragraph 133 of the Complaint are not directed at the Hitachi
7 defendants and therefore, no response is required. To the extent the averments of Paragraph 133
8 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
9 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
10 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
11 averments of Paragraph 133 of the Complaint.

12 134. The averments of Paragraph 134 of the Complaint are not directed at the Hitachi
13 defendants and therefore, no response is required. To the extent the averments of Paragraph 134
14 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
15 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
16 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
17 averments of Paragraph 134 of the Complaint.

18 135. The averments of Paragraph 135 of the Complaint are not directed at the Hitachi
19 defendants and therefore, no response is required. To the extent the averments of Paragraph 135
20 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
21 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
22 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
23 averments of Paragraph 135 of the Complaint.

24 136. The averments of Paragraph 136 of the Complaint consist of statements so
25 overbroad and ambiguous as to be incapable of response. To the extent the averments of
26 Paragraph 136 may be deemed to require a response, the Hitachi defendants deny each of the
27 averments of Paragraph 136 of the Complaint.

28 137. The averments of Paragraph 137 of the Complaint appear to be based upon

1 testimony provided at the deposition of Genichi Watanabe on December 10, 2009, which
2 testimony speaks for itself, and thus no response is required. To the extent the averments of
3 Paragraph 137 may be deemed to require a response, the Hitachi defendants deny the averments
4 of Paragraph 137 of the Complaint, except admit that Genichi Watanabe worked for various
5 divisions of Hitachi, Ltd. from 1965 through 2002.

6 138. The Hitachi defendants deny each of the averments in the first and sixth sentences
7 of Paragraph 138 of the Complaint. The averments in the second, third, fourth and fifth sentences
8 of Paragraph 138 of the Complaint appear to be based upon unspecified documents provided in
9 discovery, and thus no response is required. To the extent the averments in the second, third,
10 fourth and fifth sentences of Paragraph 138 may be deemed to require a response, the Hitachi
11 defendants respond that the unspecified documents speak for themselves and the Hitachi
12 defendants, therefore, deny, for want of information or belief, the averments in the second, third,
13 fourth and fifth sentences of Paragraph 138 of the Complaint.

14 139. The averments of Paragraph 139 of the Complaint are not directed at the Hitachi
15 defendants and therefore, no response is required. To the extent the averments of Paragraph 139
16 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
17 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
18 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
19 averments of Paragraph 139 of the Complaint.

20 140. The averments of Paragraph 140 of the Complaint are not directed at the Hitachi
21 defendants and therefore, no response is required. To the extent the averments of Paragraph 140
22 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
23 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
24 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
25 averments of Paragraph 140 of the Complaint.

26 141. The averments of Paragraph 141 of the Complaint are not directed at the Hitachi
27 defendants and therefore, no response is required. To the extent the averments of Paragraph 141
28 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the

1 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
2 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
3 averments of Paragraph 141 of the Complaint.

4 142. The averments of Paragraph 142 of the Complaint are not directed at the Hitachi
5 defendants and therefore, no response is required. To the extent the averments of Paragraph 142
6 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
7 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
8 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
9 averments of Paragraph 142 of the Complaint.

10 143. The averments in the fifth sentence of Paragraph 143 of the Complaint appear to
11 be based upon H.B. Suh's deposition testimony, and thus no response is required. To the extent
12 the averments in the fifth sentence of Paragraph 143 may be deemed to require a response, the
13 Hitachi defendants respond that the deposition testimony speak for itself and the Hitachi
14 defendants, therefore, deny, for want of information or belief, the averments in the fifth sentence
15 of Paragraph 143 of the Complaint. The Hitachi defendants deny the remainder of the averments
16 of Paragraph 143 of the Complaint as it pertains to the Hitachi defendants. To the extent the
17 remainder of the averments of Paragraph 143 of the Complaint do not pertain to the Hitachi
18 defendants, the Hitachi defendants deny, for want of information or belief, the remainder of the
19 averments of Paragraph 143 of the Complaint.

20 144. The averments in the first, second and fourth sentences of Paragraph 144 of the
21 Complaint are not directed at the Hitachi defendants and therefore, no response is required. To
22 the extent the averments in the first, second and fourth sentences of Paragraph 144 of the
23 Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
24 averments in the first, second and fourth sentences of Paragraph 144 of the Complaint as it
25 pertains to the Hitachi defendants and, to the extent the averments do not pertain to the Hitachi
26 defendants, the Hitachi defendants deny, for want of information or belief, the averments in the
27 first, second and fourth sentences of Paragraph 144 of the Complaint. The averments in the third
28 sentence of Paragraph 144 of the Complaint consist of statements so overbroad and ambiguous as

1 to be incapable of response. To the extent the averments in the third sentence of Paragraph 144
2 may be deemed to require a response, the Hitachi defendants deny, for want of information or
3 belief, the averments in the third sentence of Paragraph 144 of the Complaint.

4 145. The averments of Paragraph 145 of the Complaint are not directed at the Hitachi
5 defendants and therefore, no response is required. To the extent the averments of Paragraph 145
6 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
7 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
8 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
9 averments of Paragraph 145 of the Complaint.

10 146. The Hitachi defendants deny the averments of Paragraph 146 of the Complaint as
11 it pertains to the Hitachi defendants. To the extent the averments of Paragraph 146 of the
12 Complaint do not pertain to the Hitachi defendants, the Hitachi defendants deny, for want of
13 information or belief, the averments of Paragraph 146 of the Complaint.

14 147. The averments of Paragraph 147 of the Complaint appear to be based upon
15 testimony provided at the deposition of Brian Graham on March 9 and 10, 2010 which testimony
16 speaks for itself, and thus no response is required. To the extent the averments of Paragraph 147
17 may be deemed to require a response, the Hitachi defendants deny, for want of information or
18 belief, the averments of Paragraph 147 of the Complaint.

19 148. The averments of Paragraph 148 of the Complaint are not directed at the Hitachi
20 defendants and therefore, no response is required. To the extent the averments of Paragraph 148
21 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
22 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
23 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
24 averments of Paragraph 148 of the Complaint.

25 149. The Hitachi defendants deny the averments in the second sentence of Paragraph
26 149 of the Complaint as it pertains to the Hitachi defendants. To the extent the averments in the
27 second sentence of Paragraph 149 of the Complaint do not pertain to the Hitachi defendants, the
28 Hitachi defendants deny, for want of information or belief, the averments in the second sentence

1 of Paragraph 149 of the Complaint. The remainder of the averments of Paragraph 149 is not
2 directed at the Hitachi defendants, and therefore, no response is required. To the extent the
3 remainder of the averments of Paragraph 149 of the Complaint is directed at the Hitachi
4 defendants, the Hitachi defendants deny each of the averments as it pertains to the Hitachi
5 defendants and, to the extent the averments do not pertain to the Hitachi defendants, the Hitachi
6 defendants deny, for want of information or belief, the remainder of the averments of Paragraph
7 149 of the Complaint.

8 150. The averments in the first, second, third and sixth sentences of Paragraph 150 of
9 the Complaint are not directed at the Hitachi defendants and therefore, no response is required.
10 To the extent the averments in the first, second, third, and sixth sentences of Paragraph 150 of the
11 Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
12 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
13 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
14 averments in the first, second, third and sixth sentences of Paragraph 150 of the Complaint. The
15 averments in the fourth and fifth sentences of Paragraph 150 of the Complaint appear to be based
16 upon unspecified documents provided in discovery, which documents speak for themselves, and
17 thus no response is required. To the extent the averments in the fourth and fifth sentences of
18 Paragraph 150 may be deemed to require a response, the Hitachi defendants deny each of the
19 averments in the fourth and fifth sentences of Paragraph 150 of the Complaint as it pertains to the
20 Hitachi defendants. To the extent the averments in the fourth and fifth sentences of Paragraph
21 150 of the Complaint do not pertain to the Hitachi defendants, the Hitachi defendants deny, for
22 want of information or belief, the averments in the fourth and fifth sentences of Paragraph 150 of
23 the Complaint.

24 151. The averments of Paragraph 151 of the Complaint are not directed at the Hitachi
25 defendants and therefore, no response is required. To the extent the averments of Paragraph 151
26 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
27 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
28 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the

1 averments of Paragraph 151 of the Complaint.

2 152. The Hitachi defendants admit that IPS Alpha was formed by Hitachi Displays,
3 Ltd., Toshiba Corporation, and Matsushita Electric Industrial Co., Ltd. The Hitachi defendants
4 deny the remainder of the averments of Paragraph 152 of the Complaint as they pertain to the
5 Hitachi defendants.

6 153. The averments of Paragraph 153 of the Complaint are not directed at the Hitachi
7 defendants and therefore, no response is required. To the extent the averments of Paragraph 153
8 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
9 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
10 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
11 averments of Paragraph 153 of the Complaint.

12 154. The Hitachi defendants deny each of the averments of Paragraph 154 of the
13 Complaint as it pertains to the Hitachi defendants. To the extent the averments of Paragraph 154
14 of the Complaint do not pertain to the Hitachi defendants, the Hitachi defendants deny, for want
15 of information or belief, the averments of Paragraph 154 of the Complaint.

16 155. The Hitachi defendants deny each of the averments of Paragraph 155 of the
17 Complaint as it pertains to the Hitachi defendants. To the extent the averments of Paragraph 155
18 of the Complaint do not pertain to the Hitachi defendants, the Hitachi defendants deny, for want
19 of information or belief, the averments of Paragraph 155 of the Complaint.

20 156. The averments of Paragraph 156 of the Complaint are not directed at the Hitachi
21 defendants and therefore, no response is required. To the extent the averments of Paragraph 156
22 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
23 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
24 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
25 averments of Paragraph 156 of the Complaint.

26 157. The averments in the first sentence of Paragraph 157 of the Complaint consist of
27 statements so overbroad and ambiguous as to be incapable of response. To the extent the

28 averments in the first sentence of Paragraph 157 may be deemed to require a response, the Hitachi

1 defendants deny each of the averments in the first sentence of Paragraph 157 as it pertains to the
2 Hitachi defendants, and to the extent the averments do not pertain to the Hitachi defendants, the
3 Hitachi defendants deny, for want of information or belief, the averments in the first sentence of
4 Paragraph 157 of the Complaint. The remainder of the averments of Paragraph 157 of the
5 Complaint is not directed at the Hitachi defendants and therefore, no response is required. To the
6 extent the remainder of the averments of Paragraph 157 of the Complaint is directed at the
7 Hitachi defendants, the Hitachi defendants deny each of the averments as it pertains to the Hitachi
8 defendants and, to the extent the averments do not pertain to the Hitachi defendants, the Hitachi
9 defendants deny, for want of information or belief, the remainder of the averments of Paragraph
10 157 of the Complaint.

11 158. The Hitachi defendants deny each of the averments in the first sentence of
12 paragraph 158 of the Complaint as it pertains to the Hitachi defendants. To the extent the
13 averments in the first sentence of Paragraph 158 of the Complaint do not pertain to the Hitachi
14 defendants, the Hitachi defendants deny, for want of information or belief, the averments in the
15 first sentence of Paragraph 158 of the Complaint. The remainder of the averments of Paragraph
16 158 of the Complaint is not directed at the Hitachi defendants and therefore, no response is
17 required. To the extent the remainder of the averments of Paragraph 158 of the Complaint is
18 directed at the Hitachi defendants, the Hitachi defendants deny each of the averments as it
19 pertains to the Hitachi defendants and, to the extent the averments do not pertain to the Hitachi
20 defendants, the Hitachi defendants deny, for want of information or belief, the remainder of the
21 averments of Paragraph 158 of the Complaint.

22 159. The averments of Paragraph 159 of the Complaint are not directed at the Hitachi
23 defendants and therefore, no response is required. To the extent the averments of Paragraph 159
24 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
25 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
26 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
27 averments of Paragraph 159 of the Complaint.

28 160. The averments of Paragraph 160 of the Complaint consist of statements so

1 overbroad and ambiguous as to be incapable of response. To the extent that the averments of
2 Paragraph 160 of the Complaint may be deemed to require a response, the Hitachi defendants
3 deny each of the averments of Paragraph 160 as it pertains to the Hitachi defendants, and to the
4 extent the averments do not pertain to the Hitachi defendants, the Hitachi defendants deny, for
5 want of information or belief, the averments of Paragraph 160 of the Complaint.

6 161. The averments of Paragraph 161 of the Complaint consist of statements so
7 overbroad and ambiguous as to be incapable of response. To the extent the averments of
8 Paragraph 161 may be deemed to require a response, the Hitachi defendants deny each of the
9 averments of Paragraph 161 of the Complaint as it pertains to the Hitachi defendants and, to the
10 extent the averments of Paragraph 161 of the Complaint do not pertain to the Hitachi defendants,
11 the Hitachi defendants deny, for want of information or belief, the averments of Paragraph 161 of
12 the Complaint.

13 162. The averments in the first sentence of Paragraph 162 of the Complaint consist of
14 statements so overbroad and ambiguous as to be incapable of response. To the extent that the
15 averments in the first sentence of Paragraph 162 of the Complaint may be deemed to require a
16 response, the Hitachi defendants deny each of the averments in the first sentence of Paragraph
17 162 of the Complaint as it pertains to the Hitachi defendants, and to the extent the averments do
18 not pertain to the Hitachi defendants, the Hitachi defendants deny, for want of information or
19 belief, the averments in the first sentence of Paragraph 162 of the Complaint. The remainder of
20 the averments of Paragraph 162 of the Complaint is not directed at the Hitachi defendants and
21 therefore, no response is required. To the extent the remainder of the averments of Paragraph 162
22 of the Complaint is directed at the Hitachi defendants, the Hitachi defendants deny each of the
23 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
24 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
25 remainder of the averments of Paragraph 162 of the Complaint.

26 163. The averments in the first and third sentences of Paragraph 163 of the Complaint
27 are not directed at the Hitachi defendants and therefore, no response is required. To the extent the
28 averments in the first and third sentence of Paragraph 163 of the Complaint may be deemed to

1 require a response, the Hitachi defendants deny the averments in the first and third sentence of
2 Paragraph 163 as it pertains to the Hitachi defendants and, to the extent the averments in the first
3 and third sentence of Paragraph 163 do not pertain to the Hitachi defendants, the Hitachi
4 defendants deny, for want of information or belief, the averments in the first and third sentence of
5 Paragraph 163 of the Complaint. The Hitachi defendants deny the remainder of the averments of
6 Paragraph 163 of the Complaint as it pertains to the Hitachi defendants. To the extent the
7 averments of Paragraph 163 of the Complaint do not pertain to the Hitachi defendants, the Hitachi
8 defendants deny, for want of information or belief, the averments of Paragraph 163 of the
9 Complaint.

10 164. The averments of Paragraph 164 of the Complaint consist of statements so
11 overbroad and ambiguous as to be incapable of response. To the extent the averments of
12 Paragraph 164 may be deemed to require a response, the Hitachi defendants deny each of the
13 averments of Paragraph 164 of the Complaint as it pertains to the Hitachi defendants. To the
14 extent the averments of Paragraph 164 of the Complaint do not pertain to the Hitachi defendants,
15 the Hitachi defendants deny, for want of information or belief, the averments of Paragraph 164 of
16 the Complaint.

17 165. The averments of Paragraph 165 of the Complaint are not directed at the Hitachi
18 defendants and therefore, no response is required. To the extent the averments of Paragraph 165
19 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
20 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
21 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
22 averments of Paragraph 165 of the Complaint.

23 166. The averments of Paragraph 166 of the Complaint are not directed at the Hitachi
24 defendants and therefore, no response is required. To the extent the averments of Paragraph 166
25 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
26 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
27 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
28 averments of Paragraph 166 of the Complaint.

1 167. The averments of Paragraph 167 of the Complaint are not directed at the Hitachi
2 defendants and therefore, no response is required. To the extent the averments of Paragraph 167
3 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
4 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
5 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
6 averments of Paragraph 167 of the Complaint.

7 168. The averments of Paragraph 168 of the Complaint are not directed at the Hitachi
8 defendants and therefore, no response is required. To the extent the averments of Paragraph 168
9 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
10 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
11 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
12 averments of Paragraph 168 of the Complaint.

13 169. The averments of Paragraph 169 of the Complaint are not directed at the Hitachi
14 defendants and therefore, no response is required. To the extent the averments of Paragraph 169
15 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
16 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
17 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
18 averments of Paragraph 169 of the Complaint.

19 170. The Hitachi defendants deny each of the averments in the first sentence of
20 Paragraph 170 of the Complaint as it pertains to the Hitachi defendants. To the extent the
21 averments in the first sentence of Paragraph 170 of the Complaint do not pertain to the Hitachi
22 defendants, the Hitachi defendants deny, for want of information or belief, the averments in the
23 first sentence of Paragraph 170 of the Complaint. The remainder of the averments of Paragraph
24 170 of the Complaint is not directed at the Hitachi defendants and therefore, no response is
25 required. To the extent the remainder of the averments of Paragraph 170 of the Complaint is
26 directed at the Hitachi defendants, the Hitachi defendants deny each of the averments as it
27 pertains to the Hitachi defendants and, to the extent the averments do not pertain to the Hitachi
28 defendants, the Hitachi defendants deny, for want of information or belief, the remainder of the

1 averments of Paragraph 170 of the Complaint.

2 171. The averments of Paragraph 171 of the Complaint are not directed at the Hitachi
3 defendants and therefore, no response is required. To the extent the averments of Paragraph 171
4 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
5 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
6 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
7 averments of Paragraph 171 of the Complaint.

8 172. The averments of Paragraph 172 of the Complaint are not directed at the Hitachi
9 defendants and therefore, no response is required. To the extent the averments of Paragraph 172
10 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
11 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
12 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
13 averments of Paragraph 172 of the Complaint.

14 173. The averments of Paragraph 173 of the Complaint are not directed at the Hitachi
15 defendants and therefore, no response is required. To the extent the averments of Paragraph 173
16 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
17 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
18 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
19 averments of Paragraph 173 of the Complaint.

20 174. The averments in the first sentence of Paragraph 174 of the Complaint consist of
21 statements so overbroad and ambiguous as to be incapable of response. To the extent the
22 averments in the first sentence of Paragraph 174 may be deemed to require a response, the Hitachi
23 defendants deny, for want of information or belief, each of the averments in the first sentence of
24 Paragraph 174 of the Complaint. The averments in the second sentence of Paragraph 174 of the
25 Complaint are not directed at the Hitachi defendants and purport to be derived from LG Display's
26 public disclosures, which speak for themselves, and therefore no response is required. To the
27 extent that the averments in the second sentence of Paragraph 174 may be deemed to require a
28 response, the Hitachi defendants deny, for want of information or belief, the averments in the

1 second sentence of Paragraph 174 of the Complaint.

2 175. The averments of Paragraph 175 of the Complaint do not appear to be directed at
3 the Hitachi defendants and purport to be derived from news reports, which speak for themselves,
4 and therefore no response is required. To the extent the averments of Paragraph 175 of the
5 Complaint may be deemed to require a response, the Hitachi defendants deny each of the
6 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
7 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
8 averments of Paragraph 175 of the Complaint.

9 176. The Hitachi defendants deny, for want of information or belief, each of the
10 averments of Paragraph 176 of the Complaint.

11 177. The averments of Paragraph 177 of the Complaint are not directed at the Hitachi
12 defendants and therefore, no response is required. To the extent the averments of Paragraph 177
13 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
14 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
15 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
16 averments of Paragraph 177 of the Complaint.

17 178. The averments of Paragraph 178 of the Complaint are not directed at the Hitachi
18 defendants and therefore, no response is required. To the extent the averments of Paragraph 178
19 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
20 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
21 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
22 averments of Paragraph 178 of the Complaint.

23 179. The averments of Paragraph 179 of the Complaint are not directed at the Hitachi
24 defendants and therefore, no response is required. To the extent the averments of Paragraph 179
25 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
26 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
27 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
28 averments of Paragraph 179 of the Complaint.

1 180. The averments of Paragraph 180 of the Complaint are not directed at the Hitachi
2 defendants and therefore, no response is required. To the extent the averments of Paragraph 180
3 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
4 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
5 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
6 averments of Paragraph 180 of the Complaint.

7 181. The averments of Paragraph 181 of the Complaint are not directed at the Hitachi
8 defendants and therefore, no response is required. To the extent the averments of Paragraph 181
9 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
10 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
11 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
12 averments of Paragraph 181 of the Complaint.

13 182. The averments of Paragraph 182 of the Complaint are not directed at the Hitachi
14 defendants and therefore, no response is required. To the extent the averments of Paragraph 182
15 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
16 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
17 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
18 averments of Paragraph 182 of the Complaint.

19 183. The averments of Paragraph 183 of the Complaint are not directed at the Hitachi
20 defendants and therefore, no response is required. To the extent the averments of Paragraph 183
21 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
22 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
23 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
24 averments of Paragraph 183 of the Complaint.

25 184. The averments of Paragraph 184 of the Complaint are not directed at the Hitachi
26 defendants and therefore, no response is required. To the extent the averments of Paragraph 184
27 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
28 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain

1 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
2 averments of Paragraph 184 of the Complaint.

3 185. The averments of Paragraph 185 of the Complaint are not directed at the Hitachi
4 defendants and therefore, no response is required. To the extent the averments of Paragraph 185
5 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
6 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
7 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
8 averments of Paragraph 185 of the Complaint.

9 186. The averments of Paragraph 186 of the Complaint are not directed at the Hitachi
10 defendants and therefore, no response is required. To the extent the averments of Paragraph 186
11 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
12 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
13 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
14 averments of Paragraph 186 of the Complaint.

15 187. The averments of Paragraph 187 of the Complaint are not directed at the Hitachi
16 defendants and therefore, no response is required. To the extent the averments of Paragraph 187
17 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
18 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
19 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
20 averments of Paragraph 187 of the Complaint.

21 188. The averments of Paragraph 188 of the Complaint are not directed at the Hitachi
22 defendants and therefore, no response is required. To the extent the averments of Paragraph 188
23 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
24 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
25 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
26 averments of Paragraph 188 of the Complaint.

27 189. The averments of Paragraph 189 of the Complaint are not directed at the Hitachi
28 defendants and therefore, no response is required. To the extent the averments of Paragraph 189

1 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
2 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
3 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
4 averments of Paragraph 189 of the Complaint.

5 190. The Hitachi defendants deny the averments of Paragraph 190 of the Complaint as
6 they pertain to the Hitachi defendants and, to the extent the averments do not pertain to the
7 Hitachi defendants, deny, for want of information or belief, the averments of Paragraph 190 of the
8 Complaint.

9 191. The Hitachi defendants deny each of the averments of Paragraph 191 of the
10 Complaint.

11 192. The averments of Paragraph 192 of the Complaint consist of statements so
12 overbroad and ambiguous as to be incapable of response. To the extent that Paragraph 192 may
13 be deemed to require a response, the Hitachi defendants deny each of the averments of Paragraph
14 192 of the Complaint.

15 193. The averments of Paragraph 193 of the Complaint consist of statements so
16 overbroad and ambiguous as to be incapable of response. To the extent that Paragraph 193 may
17 be deemed to require a response, the Hitachi defendants deny, for want of information or belief,
18 each of the averments of Paragraph 193 of the Complaint.

19 194. The averments of Paragraph 194 of the Complaint consist of statements so
20 overbroad and ambiguous as to be incapable of response and/or statements that appear to
21 reference a document, without identification, which speaks for itself. To the extent that
22 Paragraph 194 may be deemed to require a response, the Hitachi defendants deny, for want of
23 information or belief, each of the averments.

24 195. The Hitachi defendants deny each of the averments of Paragraph 195 of the
25 Complaint, as it pertains to the Hitachi defendants. To the extent the averments of Paragraph 195
26 of the Complaint do not pertain to the Hitachi defendants, the Hitachi defendants deny, for want
27 of information or belief, the averments of Paragraph 195 of the Complaint.

28 196. The averments in the first, second, and third sentences of Paragraph 196 of the

1 Complaint consist of statements so overbroad and ambiguous as to be incapable of response. To
2 the extent that the averments in the first, second, and third sentences of Paragraph 196 may be
3 deemed to require a response, the Hitachi defendants deny, for want of information or belief, each
4 of those averments. The Hitachi defendants deny the remainder of the averments of Paragraph
5 196 of the Complaint as it pertains to the Hitachi defendants and to the extent the remainder of
6 the averments do not pertain to the Hitachi defendants, the Hitachi defendants deny, for want of
7 information or belief, the remainder of the averments of Paragraph 196 of the Complaint.

8 197. The averments in the first and second sentences of Paragraph 197 consist of
9 statements so overbroad and ambiguous as to be incapable of response. To the extent that the
10 first and second sentences of Paragraph 197 may be deemed to require a response, the Hitachi
11 defendants deny the averments of the first and second sentences of Paragraph 197. The
12 statements in the third sentence of Paragraph 197 purport to quote from an unidentified industry
13 magazine and thus no response is required. To the extent that the third sentence of Paragraph 197
14 may be deemed to require a response, the magazine speaks for itself and the Hitachi defendants
15 deny, for want of information or belief, the averments in the second sentence of Paragraph 197 of
16 the Complaint.

17 198. The averments of Paragraph 198 purport to be derived from unidentified industry
18 analysts, and thus no response is required. To the extent that the averments in Paragraph 198 may
19 be deemed to require a response, the Hitachi defendants respond that the analysts' statements
20 speak for themselves and the Hitachi defendants deny, for want of information or belief, the
21 averments of Paragraph 198 of the Complaint.

22 199. The averments in the first, second, fourth, fifth, and seventh sentences of
23 Paragraph 199 of the Complaint consist of statements so overbroad and ambiguous as to be
24 incapable of response. To the extent that the averments in the first, second, fourth, fifth, and
25 seventh sentences of Paragraph 199 may be deemed to require a response, the Hitachi defendants
26 deny, for want of information or belief, each averment in the first, second, fourth, fifth, and
27 seventh sentences of Paragraph 199 of the Complaint. The averments in the third sentence of
28 Paragraph 199 of the Complaint are not directed at the Hitachi defendants and therefore, no

1 response is required. The Hitachi defendants deny the averments in the sixth sentence of
2 Paragraph 199 as it pertains to the Hitachi defendants. To the extent the averments in the sixth
3 sentence of Paragraph 199 of the Complaint do not pertain to the Hitachi defendants, the Hitachi
4 defendants deny, for want of information or belief, the averments in the sixth sentence of
5 Paragraph 199 of the Complaint.

6 200. The averments of Paragraph 200 of the Complaint consist of statements so
7 overbroad and ambiguous as to be incapable of response. To the extent the averments of
8 Paragraph 200 may be deemed to require a response, the Hitachi defendants deny each of the
9 averments of Paragraph 200 of the Complaint, except admit that the component parts for an LCD
10 Panel include backlight, color filter, PCB polarizer, and glass.

11 201. The averments of Paragraph 201 of the Complaint consist of statements so
12 overbroad and ambiguous as to be incapable of response. To the extent that the averments of
13 Paragraph 201 may be deemed to require a response, the Hitachi defendants deny each of the
14 averments of Paragraph 201 of the Complaint.

15 202. The Hitachi defendants deny, for want of information or belief, each of the
16 averments of Paragraph 202 of the Complaint.

17 203. The Hitachi defendants deny each of the averments of Paragraph 203 of the
18 Complaint, as it pertains to the Hitachi defendants. To the extent the averments of Paragraph 203
19 of the Complaint do not pertain to the Hitachi defendants, the Hitachi defendants deny, for want
20 of information or belief, the averments of Paragraph 203 of the Complaint.

21 204. The averments in the first and second sentences of Paragraph 204 of the Complaint
22 consist of statements so overbroad and ambiguous as to be incapable of response. To the extent
23 that the averments in the first and second sentences of Paragraph 204 may be deemed to require a
24 response, the Hitachi defendants deny each of the averments in the first and second sentences of
25 Paragraph 204 of the Complaint. The Hitachi defendants deny each of the averments in the third
26 sentence of Paragraph 204 of the Complaint as it pertains to the Hitachi defendants and to the
27 extent the averments do not pertain to the Hitachi defendants, the Hitachi defendants deny, for
28 want of information or belief, the averments in the third sentence of Paragraph 204 of the

1 Complaint. The remainder of the averments of Paragraph 204 of the Complaint is not directed at
2 the Hitachi defendants, and therefore no response is required. To the extent that the remainder of
3 the averments of Paragraph 204 of the Complaint is directed at the Hitachi defendants, the Hitachi
4 defendants deny, for want of information or belief, the remainder of the averments of Paragraph
5 204.

6 205. The averments of Paragraph 205 of the Complaint are not directed at the Hitachi
7 defendants and therefore, no response is required. To the extent that the averments of Paragraph
8 205 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of
9 the averments as it pertains to the Hitachi defendants and, to the extent the averments of
10 Paragraph 205 do not pertain to the Hitachi defendants, the Hitachi defendants deny, for want of
11 information or belief, the averments of Paragraph 205 of the Complaint.

12 206. The averments of Paragraph 206 of the Complaint consist of statements so
13 overbroad and ambiguous as to be incapable of response. To the extent the averments of
14 Paragraph 206 may be deemed to require a response, the Hitachi defendants deny, for want of
15 information or belief, the averments of Paragraph 206 of the Complaint.

16 207. The Hitachi defendants deny the averments in the first and second sentences of
17 Paragraph 207 as they pertain to the Hitachi defendants, except admit that Hitachi Displays, Ltd.
18 and Hitachi, Ltd. manufactured certain TFT-LCD Panels and STN-LCD Panels at certain times
19 during the alleged period and that certain employees were responsible for the sale and marketing
20 of both TFT-LCDs and STN-LCDs at certain times during the alleged period. To the extent the
21 averments in the first and second sentences of Paragraph 207 of the Complaint do not pertain to
22 the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
23 averments in the first and second sentences of Paragraph 207 of the Complaint. The remainder of
24 the averments of Paragraph 207 of the Complaint are not directed at the Hitachi defendants and
25 therefore no response is required. To the extent that the remainder of the averments of Paragraph
26 207 of the Complaint is directed at the Hitachi defendants, the Hitachi defendants deny, for want
27 of information or belief, the remainder of the averments of Paragraph 207.

28 208. The Hitachi defendants deny each of the averments of Paragraph 208 of the

1 Complaint as it pertains to the Hitachi defendants. To the extent the averments of Paragraph 208
2 of the Complaint do not pertain to the Hitachi defendants, the Hitachi defendants deny, for want
3 of information or belief, the averments of Paragraph 208 of the Complaint.

4 209. The averments of Paragraph 209 of the Complaint are not directed at the Hitachi
5 defendants and therefore, no response is required. To the extent the averments of Paragraph 209
6 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
7 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
8 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
9 averments of Paragraph 209 of the Complaint.

10 210. The averments of Paragraph 210 of the Complaint are not directed at the Hitachi
11 defendants and therefore, no response is required. To the extent the averments of Paragraph 210
12 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
13 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
14 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
15 averments of Paragraph 210 of the Complaint.

16 211. The Hitachi defendants deny each of the averments in the first sentence of
17 paragraph 211 of the Complaint as it pertains to the Hitachi defendants. To the extent the
18 averments in the first sentence of Paragraph 211 of the Complaint do not pertain to the Hitachi
19 defendants, the Hitachi defendants deny, for want of information or belief, the averments in the
20 first sentence of Paragraph 211 of the Complaint. The remainder of the averments of Paragraph
21 211 of the Complaint is not directed at the Hitachi defendants and therefore, no response is
22 required. To the extent the remainder of the averments of Paragraph 211 of the Complaint is
23 directed at the Hitachi defendants, the Hitachi defendants deny each of the averments as it
24 pertains to the Hitachi defendants and, to the extent the averments do not pertain to the Hitachi
25 defendants, the Hitachi defendants deny, for want of information or belief, the remainder of the
26 averments of Paragraph 211 of the Complaint.

27 212. The averments of Paragraph 212 of the Complaint are not directed at the Hitachi
28 defendants and thus no response is required. To the extent the averments of Paragraph 212 may

1 be deemed to require a response, the Hitachi defendants deny each of the averments as it pertains
2 to the Hitachi defendants and, to the extent the averments do not pertain to the Hitachi
3 defendants, the Hitachi defendants deny, for want of information or belief, the remainder of the
4 averments of Paragraph 212 of the Complaint.

5 213. The averments of Paragraph 213 of the Complaint are not directed at the Hitachi
6 defendants and therefore, no response is required. To the extent the averments of Paragraph 213
7 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
8 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
9 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
10 averments of Paragraph 213 of the Complaint.

11 214. The Hitachi defendants deny each of the averments in the first sentence of
12 paragraph 214 of the Complaint as it pertains to the Hitachi defendants. To the extent the
13 averments in the first sentence of Paragraph 214 of the Complaint do not pertain to the Hitachi
14 defendants, the Hitachi defendants deny, for want of information or belief, the averments in the
15 first sentence of Paragraph 214 of the Complaint. The remainder of the averments in Paragraph
16 214 of the Complaint is not directed at the Hitachi defendants and therefore, no response is
17 required. To the extent the remainder of the averments of Paragraph 214 of the Complaint are
18 directed at the Hitachi defendants, the Hitachi defendants deny each of the averments as it
19 pertains to the Hitachi defendants and, to the extent the averments do not pertain to the Hitachi
20 defendants, the Hitachi defendants deny, for want of information or belief, the remainder of the
21 averments of Paragraph 214 of the Complaint.

22 215. The averments in the first sentence of Paragraph 215 of the Complaint are not
23 directed at the Hitachi defendants and therefore, no response is required. To the extent the
24 averments in the first sentence of Paragraph 215 of the Complaint are directed at the Hitachi
25 defendants, the Hitachi defendants deny each of the averments as it pertains to the Hitachi
26 defendants and, to the extent the averments do not pertain to the Hitachi defendants, the Hitachi
27 defendants deny, for want of information or belief, the averments in the first sentence of
28 Paragraph 215 of the Complaint. The averments in the second sentence of Paragraph 215 of the

1 Complaint consist of statements so overbroad and ambiguous as to be incapable of response. To
2 the extent that the averments in the second sentence of Paragraph 215 may be deemed to require a
3 response, the Hitachi defendants deny each of the averments in the second sentence of Paragraph
4 215 of the Complaint.

5 216. The averments of Paragraph 216 of the Complaint are not directed at the Hitachi
6 defendants and therefore, no response is required. To the extent the averments of Paragraph 216
7 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
8 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
9 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
10 averments of Paragraph 216 of the Complaint.

11 217. The averments of Paragraph 217 of the Complaint are not directed at the Hitachi
12 defendants and therefore, no response is required. To the extent the averments of Paragraph 217
13 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
14 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
15 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
16 averments of Paragraph 217 of the Complaint.

17 218. The averments in the first sentence of Paragraph 218 of the Complaint consist of
18 statements so overbroad and ambiguous as to be incapable of response. To the extent that the
19 averments in the first sentence of Paragraph 218 may be deemed to require a response, the Hitachi
20 defendants deny, for want of information or belief, each of the averments in the first sentence of
21 Paragraph 218 of the Complaint. The Hitachi defendants deny, for want of information or belief,
22 the averments in the second sentence of Paragraph 218 of the Complaint. The Hitachi defendants
23 deny the remainder of the averments of Paragraph 218 of the Complaint as it pertains to the
24 Hitachi defendants. To the extent the remainder of the averments of Paragraph 218 of the
25 Complaint do not pertain to the Hitachi defendants, the Hitachi defendants deny, for want of
26 information or belief, the remainder of the averments of Paragraph 218 of the Complaint.

27 219. The averments in the first sentence of Paragraph 219 of the Complaint consist of
28 statements so overbroad and ambiguous as to be incapable of response. To the extent that the

1 averments in the first sentence of Paragraph 219 may be deemed to require a response, the Hitachi
2 defendants deny, for want of information or belief, each of the averments in the first sentence of
3 Paragraph 219 of the Complaint. The Hitachi defendants deny, for want of information or belief,
4 the averments in the second sentence of Paragraph 219 of the Complaint. The Hitachi defendants
5 deny the remainder of the averments of Paragraph 219 of the Complaint as it pertains to the
6 Hitachi defendants. To the extent the remainder of the averments of Paragraph 219 of the
7 Complaint do not pertain to the Hitachi defendants, the Hitachi defendants deny, for want of
8 information or belief, the remainder of the averments of Paragraph 219 of the Complaint.

9 220. The averments of Paragraph 220 of the Complaint are not directed at the Hitachi
10 defendants and therefore, no response is required. To the extent the averments of Paragraph 220
11 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
12 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
13 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
14 averments of Paragraph 220 of the Complaint.

15 221. The Hitachi defendants deny each of the averments in the first sentence of
16 Paragraph 221 of the Complaint as it pertains to the Hitachi defendants. To the extent the
17 averments in the first sentence of Paragraph 221 of the Complaint do not pertain to the Hitachi
18 defendants, the Hitachi defendants deny, for want of information or belief, the averments in the
19 first sentence of Paragraph 221 of the Complaint. The Hitachi defendants deny, for want of
20 information or belief, the averments in the second sentence of Paragraph 221 of the Complaint.
21 The averments in the remainder of Paragraph 221 of the Complaint are not directed at the Hitachi
22 defendants and therefore, no response is required. To the extent the averments in the remainder
23 of Paragraph 221 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants
24 deny each of the averments in the remainder of Paragraph 221 as it pertains to the Hitachi
25 defendants and, to the extent the averments do not pertain to the Hitachi defendants, the Hitachi
26 defendants deny, for want of information or belief, the averments in the remainder of Paragraph
27 221 of the Complaint.

28 222. The Hitachi defendants deny each of the averments of Paragraph 222 of the

1 Complaint as it pertains to the Hitachi defendants. To the extent the averments of Paragraph 222
2 of the Complaint do not pertain to the Hitachi defendants, the Hitachi defendants deny, for want
3 of information or belief, the averments of Paragraph 222 of the Complaint.

4 223. The averments of Paragraph 223 of the Complaint appear to be prefatory only and
5 consist of statements so overbroad and ambiguous as to be incapable of response. To the extent
6 the averments of Paragraph 223 may be deemed to require a response, the Hitachi defendants
7 deny, for want of information or belief, each of the averments of Paragraph 223 of the Complaint.

8 224. The averments of Paragraph 224 of the Complaint appear to be prefatory only and
9 consist of statements so overbroad and ambiguous as to be incapable of response. To the extent
10 the averments of Paragraph 224 may be deemed to require a response, the Hitachi defendants
11 deny, for want of information or belief, each of the averments of Paragraph 224 of the Complaint.

12 225. The averments of the first sentence of Paragraph 225 of the Complaint consist of
13 statements so overbroad and ambiguous as to be incapable of response. To the extent the
14 averments of the first sentence of Paragraph 225 may be deemed to require a response, the
15 Hitachi defendants deny, for want of information or belief, each of the averments of the first
16 sentence of Paragraph 225 of the Complaint. The averments in the second and third sentences of
17 Paragraph 225 of the Complaint are not directed at the Hitachi defendants and therefore, no
18 response is required. To the extent the averments in the second and third sentences of Paragraph
19 225 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of
20 the averments in the second and third sentences of Paragraph 225 as it pertains to the Hitachi
21 defendants and, to the extent the averments do not pertain to the Hitachi defendants, the Hitachi
22 defendants deny, for want of information or belief, the averments in the second and third
23 sentences of Paragraph 225 of the Complaint. The Hitachi defendants deny the remainder of the
24 averments of Paragraph 225 of the Complaint as it pertains to the Hitachi defendants and to the
25 extent the averments in the remainder of Paragraph 225 of the Complaint do not pertain to the
26 Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the remainder
27 of the averments of Paragraph 225 of the Complaint.

28 226. The averments of Paragraph 226 of the Complaint consist of statements so

1 overbroad and ambiguous as to be incapable of response. To the extent the averments of
2 Paragraph 226 may be deemed to require a response, the Hitachi defendants deny, for want of
3 information or belief, the averments of Paragraph 226 of the Complaint.

4 227. The Hitachi defendants deny each of the averments of in the first sentence
5 Paragraph 227 of the Complaint as it pertains to the Hitachi defendants. To the extent the
6 averments in the first sentence of Paragraph 227 of the Complaint do not pertain to the Hitachi
7 defendants, the Hitachi defendants deny, for want of information or belief, the averments in the
8 first sentence of Paragraph 227 of the Complaint. The averments in the remainder of Paragraph
9 227 of the Complaint are not directed at the Hitachi defendants and therefore, no response is
10 required. To the extent the averments in the remainder of Paragraph 227 of the Complaint are
11 directed at the Hitachi defendants, the Hitachi defendants deny each of the averments in the
12 remainder of Paragraph 227 as it pertains to the Hitachi defendants and, to the extent the
13 averments do not pertain to the Hitachi defendants, the Hitachi defendants deny, for want of
14 information or belief, the averments in the remainder of Paragraph 227 of the Complaint.

15 228. The averments in the first and second sentences of Paragraph 228 of the Complaint
16 consist of statements so overbroad and ambiguous as to be incapable of response. To the extent
17 the averments in the first and second sentences of Paragraph 228 may be deemed to require a
18 response, the Hitachi defendants deny, for want of information or belief, the averments in the first
19 and second sentences of Paragraph 228 of the Complaint. The averments in the third sentence of
20 Paragraph 228 of the Complaint are not directed at the Hitachi defendants and therefore, no
21 response is required. To the extent the averments in the third sentence of Paragraph 228 of the
22 Complaint are directed at the Hitachi defendants, the Hitachi defendants deny, for want of
23 information or belief, the averments in the third sentence of Paragraph 228 of the Complaint.

24 229. The averments in the first sentence of Paragraph 229 of the Complaint consist of
25 statements so overbroad and ambiguous as to be incapable of response. To the extent the
26 averments in the first sentence of Paragraph 229 may be deemed to require a response, the Hitachi
27 defendants deny, for want of information or belief, each of the averments in the first sentence of
28 Paragraph 229 of the Complaint. The Hitachi defendants deny each of the averments in the

1 second and fourth sentences of Paragraph 229 of the Complaint as it pertains to the Hitachi
2 defendants and, to the extent the averments in the second and fourth sentences of Paragraph 229
3 of the Complaint do not pertain to the Hitachi defendants, the Hitachi defendants deny, for want
4 of information or belief, the averments in the second and fourth sentences of Paragraph 229 of the
5 Complaint. The averments in the third sentence of Paragraph 229 of the Complaint are not
6 directed at the Hitachi defendants and therefore, no response is required. To the extent the
7 averments in the third sentence of Paragraph 229 of the Complaint are directed at the Hitachi
8 defendants, the Hitachi defendants deny the averments as they pertain to the Hitachi defendants
9 and, to the extent the averments do not pertain to the Hitachi defendants, the Hitachi defendants
10 deny, for want of information or belief, the averments in the third sentence of Paragraph 229 of
11 the Complaint.

12 230. The Hitachi defendants deny each of the averments of Paragraph 230 of the
13 Complaint as it pertains to the Hitachi defendants. To the extent the averments of Paragraph 230
14 of the Complaint do not pertain to the Hitachi defendants, the Hitachi defendants deny, for want
15 of information or belief, the averments of Paragraph 230 of the Complaint.

16 231. The Hitachi defendants admit that there are several trade organizations that
17 convene meetings aimed at manufacturers and/or distributors of TFT-LCD panels and/or products
18 containing TFT-LCD panels. The Hitachi defendants deny the remainder of the averments of
19 Paragraph 231 of the Complaint.

20 232. The averments of Paragraph 232 of the Complaint are not directed at the Hitachi
21 defendants and purport to be derived from the public statements of TTLA, which statements
22 speak for themselves, and, therefore, no response is required. To the extent the averments of
23 Paragraph 232 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants
24 deny each of the averments as it pertains to the Hitachi defendants and, to the extent the
25 averments do not pertain to the Hitachi defendants, the Hitachi defendants deny, for want of
26 information or belief, the averments of Paragraph 232 of the Complaint.

27 233. The averments of Paragraph 233 of the Complaint are not directed at the Hitachi
28 defendants and purport to be derived from the public statements, which statements speak for

1 themselves, and, therefore, no response is required. To the extent the averments of Paragraph 233
2 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
3 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
4 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
5 averments of Paragraph 233 of the Complaint.

6 234. The Hitachi defendants deny each of the averments of Paragraph 234 of the
7 Complaint as it pertains to the Hitachi defendants, except admit that Hitachi, Ltd. was a member
8 of SEAJ until March 2003. To the extent the averments of Paragraph 234 of the Complaint do
9 not pertain to the Hitachi defendants, the Hitachi defendants deny, for want of information or
10 belief, the averments of Paragraph 234 of the Complaint.

11 235. The Hitachi defendants admit that the Society for Information Display (“SID”)
12 puts on multiple annual meetings, including conferences referred to as the “SID International
13 Symposium and Business Conference” and the “International Display Research Conference.”
14 The Hitachi defendants deny, for want of information or belief, the remainder of the averments of
15 Paragraph 235 of the Complaint.

16 236. The Hitachi defendants admit that certain employees of the Hitachi defendants
17 attended the 2004 SID conference. The remainder of the averments of Paragraph 236 of the
18 Complaint purport to be derived from presentations given during the conference, which speak for
19 themselves, and thus no response is required. To the extent the averments of Paragraph 236 may
20 be deemed to require a response, the Hitachi defendants respond that the presentations speak for
21 themselves and the Hitachi defendants deny, for want of information or belief, the averments of
22 Paragraph 236 of the Complaint.

23 237. The Hitachi defendants admit that certain employees of Hitachi Displays, Ltd.
24 attended the 2005 SID conference. The remainder of the averments of Paragraph 237 of the
25 Complaint purport to be derived from presentations given during the conference and thus no
26 response is required. To the extent the remainder of the averments may be deemed to require a
27 response, the Hitachi defendants respond that the presentations speak for themselves and the
28 Hitachi defendants deny, for want of information or belief, the averments of Paragraph 237 of the

1 Complaint.

2 238. The averments in the first sentence of Paragraph 238 of the Complaint consist of
3 statements so overbroad and ambiguous as to be incapable of response. To the extent that the
4 first sentence of Paragraph 238 may be deemed to require a response, the Hitachi defendants
5 deny, for want of information or belief, the averments in the first sentence of Paragraph 238 of the
6 Complaint. The remainder of the averments of Paragraph 238 of the Complaint purport to be
7 derived from a presentation given during the SID 2005 conference and thus no response is
8 required. To the extent the remainder of the averments of Paragraph 238 may be deemed to
9 require a response, the Hitachi defendants respond that the presentation speaks for itself and the
10 Hitachi defendants deny, for want of information or belief, the remainder of the averments of
11 Paragraph 238 of the Complaint.

12 239. The Hitachi defendants admit that certain employees of Hitachi Displays, Ltd.
13 gave a presentation at the SID 2005 conference. The Hitachi defendants deny the averments in
14 the first sentence of Paragraph 239 of the Complaint. The remainder of the averments of
15 Paragraph 239 of the Complaint purports to be derived from presentations given during the
16 conference and thus no response is required. To the extent the remainder of the averments of
17 Paragraph 239 may be deemed to require a response, the Hitachi defendants respond that the
18 presentations speak for themselves and the Hitachi defendants deny, for want of information or
19 belief, the remainder of the averments of Paragraph 239 of the Complaint.

20 240. The Hitachi defendants deny each of the averments contained in the first sentence
21 of Paragraph 240 of the Complaint and deny, for want of information or belief, the remainder of
22 the averments of Paragraph 240 of the Complaint.

23 241. The Hitachi defendants deny each of the averments contained in the first sentence
24 of Paragraph 241 of the Complaint and deny, for want of information or belief, the remainder of
25 the averments of Paragraph 241 of the Complaint.

26 242. The averments of Paragraph 242 of the Complaint are not directed at the Hitachi
27 defendants and purport to be derived from public statements made at the 2006 GFPC and thus no
28 response is required. To the extent the averments of Paragraph 242 may be deemed to require a

1 response, the Hitachi defendants respond that the public statements speak for themselves and the
2 Hitachi defendants deny, for want of information or belief, the remainder of the averments of
3 Paragraph 242 of the Complaint.

4 243. The averments of Paragraph 243 of the Complaint are not directed at the Hitachi
5 defendants and therefore, no response is required. To the extent the averments of Paragraph 243
6 may be deemed to require a response, the Hitachi defendants deny, for want of information or
7 belief, the averments of Paragraph 243 of the Complaint.

8 244. The averments of Paragraph 244 of the Complaint consist of statements so
9 overbroad and ambiguous as to be incapable of response and also purport to be derived from
10 public pronouncements and thus no response is required. To the extent the averments of
11 Paragraph 244 may be deemed to require a response, the Hitachi defendants respond that the
12 public pronouncements speak for themselves and the Hitachi defendants deny the averments of
13 Paragraph 244 of the Complaint.

14 245. The averments of Paragraph 245 consist of conclusions of law to which no
15 response is required. To the extent that Paragraph 245 may be deemed to require a response, the
16 Hitachi defendants deny each of the averments of Paragraph 245 of the Complaint as it pertains to
17 the Hitachi defendants and to the extent the averments do not pertain to the Hitachi defendants,
18 the Hitachi defendants deny, for want of information or belief, the averments of Paragraph 245 of
19 the Complaint.

20 246. The averments of Paragraph 246 of the Complaint consist of statements so
21 overbroad and ambiguous as to be incapable of response. To the extent the averments of
22 Paragraph 246 may be deemed to require a response, the Hitachi defendants deny, for want of
23 information or belief, each of the averments of Paragraph 246 of the Complaint.

24 247. The averments of Paragraph 247 consist of conclusions of law to which no
25 response is required. To the extent that Paragraph 247 may be deemed to require a response, the
26 Hitachi defendants deny each of the averments of Paragraph 247 of the Complaint as it pertains to
27 the Hitachi defendants, except admit that the Hitachi defendants shipped certain LCD panels
28 directly into the United States at certain times during the alleged period. To the extent the

1 averments of Paragraph 247 do not pertain to the Hitachi defendants, the Hitachi defendants deny,
2 for want of information or belief, the averments of Paragraph 247 of the Complaint.

3 248. The averments of Paragraph 248 of the Complaint consist of statements so
4 overbroad and ambiguous as to be incapable of response. To the extent the averments of
5 Paragraph 248 may be deemed to require a response, the Hitachi defendants deny each of the
6 averments of Paragraph 248 of the Complaint as it pertains to the Hitachi defendants, and to the
7 extent the averments do not pertain to the Hitachi defendants, the Hitachi defendants deny, for
8 want of information or belief, the averments of Paragraph 248 of the Complaint.

9 249. The averments of Paragraph 249 of the Complaint consist of statements so
10 overbroad and ambiguous as to be incapable of response. To the extent the averments of
11 Paragraph 249 may be deemed to require a response, the Hitachi defendants deny each of the
12 averments of Paragraph 249 of the Complaint as it pertains to the Hitachi defendants and to the
13 extent the averments do not pertain to the Hitachi defendants, the Hitachi defendants deny, for
14 want of information or belief, the averments of Paragraph 249 of the Complaint.

15 250. The averments of the first sentence of Paragraph 250 consist of conclusions of law
16 to which no response is required. To the extent that the first sentence of Paragraph 250 may be
17 deemed to require a response, the Hitachi defendants deny each of the averments in the first
18 sentence of Paragraph 250 of the Complaint as it pertains to the Hitachi defendants and to the
19 extent the averments do not pertain to the Hitachi defendants, the Hitachi defendants deny, for
20 want of information or belief, the averments in the first sentence of Paragraph 250 of the
21 Complaint. The remaining averments are not directed at Hitachi defendants and purport to be
22 derived from complaints filed with the United States International Trade Commission, which
23 speak for themselves, therefore no response is required.

24 251. The averments of Paragraph 251 of the Complaint purport to be derived from the
25 plea agreements entered into by certain defendants, and therefore no response is required. To the
26 extent the averments of Paragraph 251 may be deemed to require a response, the Hitachi
27 defendants respond that the referenced documents speak for themselves and therefore deny, for
28 want of information or belief, the averments of Paragraph 251 of the Complaint, except admit that

1 the plea agreement entered into by Hitachi Displays, Ltd. states that “[t]he business activities of
2 [Hitachi Displays, Ltd. and its alleged coconspirators] in connection with the production and sale
3 of TFT-LCD affected by this conspiracy were within the flow of, and substantially affected,
4 interstate and foreign trade and commerce.”

5 252. The averments of Paragraph 252 consist of conclusions of law to which no
6 response is required. To the extent that Paragraph 252 may be deemed to require a response, the
7 Hitachi defendants deny each of the averments of Paragraph 252 of the Complaint as it pertains to
8 the Hitachi defendants and to the extent the averments do not pertain to the Hitachi defendants,
9 the Hitachi defendants deny, for want of information or belief, the averments of Paragraph 252 of
10 the Complaint.

11 253. The averments in the first sentence of Paragraph 253 of the Complaint consist of
12 conclusions of law to which no response is required. To the extent that the averments in the first
13 sentence of Paragraph 253 may be deemed to require a response, the Hitachi defendants deny
14 each of the averments in the first sentence of Paragraph 253 of the Complaint. The Hitachi
15 defendants deny each of the averments in the second sentence of Paragraph 253 of the Complaint
16 as it pertains to the Hitachi defendants. To the extent the averments in the second sentence of
17 Paragraph 253 of the Complaint do not pertain to the Hitachi defendants, the Hitachi defendants
18 deny, for want of information or belief, the averments in the second sentence of Paragraph 253 of
19 the Complaint.

20 254. The Hitachi defendants deny the averments in first sentence of Paragraph 254 of
21 the Complaint as it pertains to the Hitachi defendants. To the extent that the averments in the first
22 sentence of Paragraph 254 of the Complaint do not pertain to the Hitachi defendants, the Hitachi
23 defendants deny, for want of information or belief, each of the averments in the first sentence of
24 Paragraph 254 of the Complaint. The Hitachi defendants deny, for want of information or belief,
25 each of the averments in the second sentence of Paragraph 254 of the Complaint.

26 255. The Hitachi defendants deny, for want of information or belief, each of the
27 averments of Paragraph 255 of the Complaint.

28 256. The Hitachi defendants deny each of the averments of Paragraph 256 of the

1 Complaint as it pertains to the Hitachi defendants. To the extent the averments of Paragraph 256
2 of the Complaint do not pertain to the Hitachi defendants, the Hitachi defendants deny, for want
3 of information or belief, the averments of Paragraph 256 of the Complaint.

4 257. The Hitachi defendants deny, for want of information or belief, each of the
5 averments in the first sentence of Paragraph 257 of the Complaint. The Hitachi defendants deny
6 the remainder of the averments of Paragraph 257 of the Complaint as they pertain to the Hitachi
7 defendants. To the extent the remainder of the averments of Paragraph 257 of the Complaint do
8 not pertain to the Hitachi defendants, the Hitachi defendants deny, for want of information or
9 belief, the remainder of the averments of Paragraph 257 of the complaint.

10 258. The averments in the first and second sentences of Paragraph 258 consist of
11 statements so overbroad and ambiguous as to be incapable of response. To the extent the
12 averments in the first and second sentences of Paragraph 258 may be deemed to require a
13 response, the Hitachi defendants deny, for want of information or belief, the averments in the first
14 and second sentences of Paragraph 258 of the Complaint. The averments in the third sentence of
15 Paragraph 258 of the Complaint consist of conclusions of law to which no response is required.
16 To the extent that the averments in the third sentence of Paragraph 258 may be deemed to require
17 a response, the Hitachi defendants deny each of the averments in the third sentence of Paragraph
18 258.

19 259. The averments in the first and fourth sentences of Paragraph 259 of the Complaint
20 consist of conclusions of law to which no response is required. To the extent that the averments
21 in the first and fourth sentences of Paragraph 259 may be deemed to require a response, the
22 Hitachi defendants deny each of the averments in the first and fourth sentences of Paragraph 259
23 of the Complaint. The averments in the second and third sentences of Paragraph 259 consist of
24 statements so overbroad and ambiguous as to be incapable of response. To the extent the
25 averments in the second and third sentences of Paragraph 259 may be deemed to require a
26 response, the Hitachi defendants deny each of the averments as it pertains to the Hitachi
27 defendants, and to the extent the averments do not pertain to the Hitachi defendants, the Hitachi
28 defendants deny, for want of information or belief, the averments in the second and third

1 sentences of Paragraph 259 of the Complaint.

2 260. The averments of Paragraph 260 of the Complaint consist of conclusions of law to
3 which no response is required. To the extent the averments of Paragraph 260 may be deemed to
4 require a response, the Hitachi defendants deny each of the averments of Paragraph 260 of the
5 Complaint.

6 261. The Hitachi defendants deny each of the averments of Paragraph 261 of the
7 Complaint as it pertains to the Hitachi defendants. To the extent the averments do not pertain to
8 the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
9 averments of Paragraph 261 of the Complaint.

10 262. The averments in the first sentence of Paragraph 262 of the Complaint consist of
11 conclusions of law to which no response is required. To the extent the averments in the first
12 sentence of Paragraph 262 may be deemed to require a response, the Hitachi defendants deny the
13 averments in the first sentence of Paragraph 262 of the Complaint. The remainder of the
14 averments of Paragraph 262 of the Complaint appears to reference unidentified documents,
15 internal meeting reports, notes and the transcript of a deposition, which documents speak for
16 themselves, and therefore no response is require. To the extent that the remainder of the
17 averments of Paragraph 262 may be deemed to require a response, the Hitachi defendants deny,
18 for want of information or belief, the remainder of the averments of Paragraph 262 of the
19 Complaint.

20 263. The averments in the first and fourth sentences of Paragraph 263 are so overbroad
21 and ambiguous as to be incapable of response. To the extent the averments in the first and fourth
22 sentences of Paragraph 263 may be deemed to require a response, the Hitachi defendants deny
23 each of the averments in the first and fourth sentences of Paragraph 263 as it pertains to the
24 Hitachi defendants and, to the extent the averments in the first and fourth sentences of Paragraph
25 263 of the Complaint do not pertain to the Hitachi defendants, the Hitachi defendants deny, for
26 want of information or belief, the averments in the first and fourth sentences of Paragraph 263 of
27 the Complaint. The remainder of the averments of Paragraph 263 of the Complaint is not directed
28 at the Hitachi defendants, and appears to reference unidentified documents, which speak for

1 themselves, and therefore, no response is required. To the extent the remainder of the averments
2 of Paragraph 263 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants
3 deny the remainder of the averments as it pertains to the Hitachi defendants and, to the extent the
4 remainder of the averments do not pertain to the Hitachi defendants, the Hitachi defendants deny,
5 for want of information or belief, the remainder of the averments of Paragraph 263 of the
6 Complaint.

7 264. The Hitachi defendants deny each of the averments in the first, second, third, and
8 fourth sentences of Paragraph 264 of the Complaint as it pertains to the Hitachi defendants. To
9 the extent the averments in the first, second, third, and fourth sentences of Paragraph 264 of the
10 Complaint do not pertain to the Hitachi defendants, the Hitachi defendants deny, for want of
11 information or belief, the averments in the first, second, third, and fourth sentences of Paragraph
12 264 of the Complaint. The remainder of the averments of Paragraph 264 of the Complaint is not
13 directed at the Hitachi defendants and therefore, no response is required. To the extent the
14 remainder of the averments of Paragraph 264 of the Complaint are directed at the Hitachi
15 defendants, the Hitachi defendants deny the remainder of the averments as it pertains to the
16 Hitachi defendants and, to the extent the remainder of the averments do not pertain to the Hitachi
17 defendants, the Hitachi defendants deny, for want of information or belief, the remainder of the
18 averments of Paragraph 264 of the Complaint.

19 265. The averments of Paragraph 265 of the Complaint are not directed at the Hitachi
20 defendants and therefore, no response is required. To the extent the averments of Paragraph 265
21 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
22 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain
23 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
24 averments of Paragraph 265 of the Complaint.

25 266. The averments of Paragraph 266 of the Complaint are not directed at the Hitachi
26 defendants and therefore, no response is required. To the extent the averments of Paragraph 266
27 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants deny each of the
28 averments as it pertains to the Hitachi defendants and, to the extent the averments do not pertain

1 to the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
2 averments of Paragraph 266 of the Complaint.

3 267. The Hitachi defendants deny each of the averments of Paragraph 267 of the
4 Complaint, as it pertains to the Hitachi defendants. To the extent the averments of Paragraph 267
5 of the Complaint do not pertain to the Hitachi defendants, the Hitachi defendants deny, for want
6 of information or belief, the averments of Paragraph 267 of the Complaint.

7 268. The averments in the first and second sentences of Paragraph 268 of the Complaint
8 consist of statements so overbroad and ambiguous as to be incapable of response. To the extent
9 that the averments in the first and second sentences of Paragraph 268 may be deemed to require a
10 response, the Hitachi defendants deny each of the averments in the first and second sentences of
11 Paragraph 268 of the Complaint as it pertains to the Hitachi defendants, and to the extent the
12 averments in the first and second sentences of Paragraph 268 of the Complaint do not pertain to
13 the Hitachi defendants, the Hitachi defendants deny, for want of information or belief, the
14 averments in the first and second sentences of Paragraph 268 of the Complaint. The remainder of
15 the averments of Paragraph 268 of the Complaint purport to be derived from the public statements
16 of NEC's marketing manager, LGD's Vice President of the Sales Division and Samsung's
17 President and CEO of the Semiconductor Division and therefore, no response is required. To the
18 extent that the remainder of Paragraph 268 may be deemed to require a response, the statements
19 speak for themselves and the Hitachi defendants deny, for want of information or belief, the
20 remainder of the averments of Paragraph 268.

21 269. The averments in the first sentence of Paragraph 269 of the Complaint consist of
22 statements so overbroad and ambiguous as to be incapable of response. To the extent that the
23 averments in the first sentence of Paragraph 269 may be deemed to require a response, the Hitachi
24 defendants deny each of the averments in the first sentence of Paragraph 269 as it pertains to the
25 Hitachi defendants and, to the extent the averments do not pertain to the Hitachi defendants, the
26 Hitachi defendants deny, for want of information or belief, the averments in the first sentence of
27 Paragraph 269 of the Complaint. The remainder of the averments are not directed at the Hitachi
28 defendants and purport to be derived from statements by the marketing manager for Sharp, which

1 statements speak for themselves, and, therefore, no response is required. To the extent the
2 averments of Paragraph 269 of the Complaint are directed at the Hitachi defendants, the Hitachi
3 defendants deny each of the averments as it pertains to the Hitachi defendants and, to the extent
4 the averments do not pertain to the Hitachi defendants, the Hitachi defendants deny, for want of
5 information or belief, the averments of Paragraph 269 of the Complaint.

6 270. The averments of Paragraph 270 of the Complaint are not directed at the Hitachi
7 defendants and purport to be derived from statements by the CEO of Samsung, which statements
8 speak for themselves, and, therefore, no response is required. To the extent the averments of
9 Paragraph 270 of the Complaint are directed at the Hitachi defendants, the Hitachi defendants
10 deny each of the averments as it pertains to the Hitachi defendants and, to the extent the
11 averments do not pertain to the Hitachi defendants, the Hitachi defendants deny, for want of
12 information or belief, the averments of Paragraph 270 of the Complaint.

13 271. The averments in the first sentence of Paragraph 271 of the Complaint consist of
14 statements so overbroad and ambiguous as to be incapable of response. To the extent that the
15 averments in the first sentence of Paragraph 271 may be deemed to require a response, the Hitachi
16 defendants deny each of the averments in the first sentence of Paragraph 271 as it pertains to the
17 Hitachi defendants and, to the extent the averments do not pertain to the Hitachi defendants, the
18 Hitachi defendants deny, for want of information or belief, the averments in the first sentence of
19 Paragraph 271 of the Complaint. The remainder of the averments is not directed at the Hitachi
20 defendants and purport to be derived from the public statements by LGD Philips, which
21 statements speak for themselves, and, therefore, no response is required. To the extent the
22 averments of Paragraph 271 of the Complaint are directed at the Hitachi defendants, the Hitachi
23 defendants deny each of the averments as it pertains to the Hitachi defendants and, to the extent
24 the averments do not pertain to the Hitachi defendants, the Hitachi defendants deny, for want of
25 information or belief, the averments of Paragraph 271 of the Complaint.

26 272. The averments of Paragraph 272 of the Complaint are not directed at the Hitachi
27 defendants and purport to be derived from the public statements of Chi Mei's Vice President and
28 AU Optronics' President, which statements speak for themselves, and therefore, no response is

1 required. To the extent the averments of Paragraph 272 of the Complaint are directed at the
2 Hitachi defendants, the Hitachi defendants deny each of the averments as it pertains to the Hitachi
3 defendants and, to the extent the averments do not pertain to the Hitachi defendants, the Hitachi
4 defendants deny, for want of information or belief, the averments of Paragraph 272 of the
5 Complaint.

6 273. The Hitachi defendants deny each of the averments of Paragraph 273 of the
7 Complaint, as it pertains to the Hitachi defendants. To the extent the averments of Paragraph 273
8 of the Complaint do not pertain to the Hitachi defendants, the Hitachi defendants deny, for want
9 of information or belief, the averments of Paragraph 273 of the Complaint.

10 274. The averments in the first sentence of Paragraph 274 of the Complaint consist of
11 conclusions of law to which no response is required. To the extent that the averments in the first
12 sentence of Paragraph 274 may be deemed to require a response, the Hitachi defendants deny
13 each of the averments in the first sentence of Paragraph 274 of the Complaint. The Hitachi
14 defendants deny each of the averments in the second sentence of Paragraph 274 of the Complaint
15 as it pertains to the Hitachi defendants. To the extent the averments in the second sentence of
16 Paragraph 274 of the Complaint do not pertain to the Hitachi defendants, the Hitachi defendants
17 deny, for want of information or belief, the averments in the second sentence of Paragraph 274 of
18 the Complaint.

19 275. The averments of Paragraph 275 of the Complaint consist of conclusions of law to
20 which no response is required. To the extent the averments of Paragraph 275 may be deemed to
21 require a response, the Hitachi defendants deny each of the averments of Paragraph 275 of the
22 Complaint.

23 276. The averments of Paragraph 276 of the Complaint consist of conclusions of law to
24 which no response is required. To the extent the averments of Paragraph 276 may be deemed to
25 require a response, the Hitachi defendants deny each of the averments of Paragraph 276 of the
26 Complaint.

27 277. The averments of Paragraph 277 of the Complaint consist of conclusions of law to
28 which no response is required. To the extent the averments of Paragraph 277 may be deemed to

1 require a response, the Hitachi defendants deny each of the averments of Paragraph 277 of the
2 Complaint.

3 278. The averments of Paragraph 278 of the Complaint consist of conclusions of law to
4 which no response is required. To the extent the averments of Paragraph 278 may be deemed to
5 require a response, the Hitachi defendants deny each of the averments of Paragraph 278 of the
6 Complaint.

7 279. The averments of Paragraph 279 of the Complaint consist of conclusions of law to
8 which no response is required. To the extent the averments of Paragraph 279 may be deemed to
9 require a response, the Hitachi defendants deny each of the averments of Paragraph 279 of the
10 Complaint.

11 280. Answering the averments of Paragraph 280 of the Complaint, the Hitachi
12 defendants incorporate by this reference their responses, set forth above in this Answer and as if
13 set forth fully herein, to the averments of Paragraphs 1 through 279 of the Complaint.

14 281. The averments of Paragraph 281 of the Complaint consist of conclusions of law to
15 which no response is required. To the extent that Paragraph 281 may be deemed to require a
16 response, the Hitachi defendants deny each of the averments of Paragraph 281.

17 282. The averments of Paragraph 282 of the Complaint consist of conclusions of law to
18 which no response is required. To the extent that Paragraph 282 may be deemed to require a
19 response, the Hitachi defendants deny each of the averments of Paragraph 282.

20 283. The averments of Paragraph 283 of the Complaint consist of conclusions of law to
21 which no response is required. To the extent that Paragraph 283 may be deemed to require a
22 response, the Hitachi defendants deny each of the averments of Paragraph 283 of the Complaint.

23 284. The averments of Paragraph 284 of the Complaint consist of conclusions of law to
24 which no response is required. To the extent the averments of Paragraph 284 may be deemed to
25 require a response, the Hitachi defendants deny each of the averments of Paragraph 284.

26 285. The averments of Paragraph 285 consist of conclusions of law to which no
27 response is required. To the extent that Paragraph 285 may be deemed to require a response, the
28 Hitachi defendants deny each of the averments of Paragraph 285 of the Complaint, as it pertains

1 to the Hitachi defendants and to the extent the averments do not pertain to the Hitachi defendants,
2 the Hitachi defendants deny, for want of information or belief, the averments of Paragraph 285 of
3 the Complaint.

4 286. The averments of Paragraph 286 of the Complaint consist of conclusions of law to
5 which no response is required. To the extent that Paragraph 286 may be deemed to require a
6 response, the Hitachi defendants deny each of the averments of Paragraph 286.

7 287. The averments of Paragraph 287 of the Complaint relate exclusively to Plaintiff's
8 claims for violations of the California Cartwright Act, the California Unfair Competition Law,
9 and New York General Business Law § 340 et seq., which the Court dismissed in an order dated
10 February 6, 2012 (Dkt. No. 4786), and, therefore, no response is required. To the extent that
11 Paragraph 287 may be deemed to require a response, the Hitachi defendants answer the averments
12 of Paragraph 287 of the Complaint by incorporating by reference their responses, set forth above
13 in this Answer and as if set forth fully herein, to the averments of Paragraph 1 through 286 of the
14 Complaint.

15 288. The averments of Paragraph 288 of the Complaint relate exclusively to Plaintiff's
16 claims for violations of the California Cartwright Act, which the Court dismissed in an order
17 dated February 6, 2012 (Dkt. No. 4786), and consist of conclusions of law, and therefore, no
18 response is required. To the extent that Paragraph 288 may be deemed to require a response, the
19 Hitachi defendants deny each of the averments of Paragraph 288.

20 289. The averments of Paragraph 289 of the Complaint relate exclusively to Plaintiff's
21 claims for violations of the California Cartwright Act, which the Court dismissed in an order
22 dated February 6, 2012 (Dkt. No. 4786), and therefore, no response is required. To the extent that
23 Paragraph 288 may be deemed to require a response, the Hitachi defendants deny, for want of
24 information or belief, each of the averments of Paragraph 289.

25 290. The averments of Paragraph 290 of the Complaint relate exclusively to Plaintiff's
26 claims for violations of the California Cartwright Act, which the Court dismissed in an order
27 dated February 6, 2012 (Dkt. No. 4786), and consist of conclusions of law, and therefore, no
28 response is required. To the extent that Paragraph 290 may be deemed to require a response, the

1 Hitachi defendants deny each of the averments of Paragraph 290.

2 291. The averments of Paragraph 291 of the Complaint relate exclusively to Plaintiff's
3 claims for violations of the California Cartwright Act, which the Court dismissed in an order
4 dated February 6, 2012 (Dkt. No. 4786), and therefore, no response is required. To the extent that
5 Paragraph 291 may be deemed to require a response, the Hitachi defendants deny the averments
6 of Paragraph 291 of the Complaint as they pertain to the Hitachi defendants, and to the extent the
7 averments do not pertain to the Hitachi defendants, the Hitachi defendants deny, for want of
8 information or belief, the averments of Paragraph 291 of the Complaint.

9 292. The averments of Paragraph 292 of the Complaint relate exclusively to Plaintiff's
10 claims for violations of the California Cartwright Act, which the Court dismissed in an order
11 dated February 6, 2012 (Dkt. No. 4786), and consist of conclusions of law, and therefore, no
12 response is required. To the extent that Paragraph 292 may be deemed to require a response, the
13 Hitachi defendants deny each of the averments of Paragraph 292.

14 293. The averments of Paragraph 293 of the Complaint relate exclusively to Plaintiff's
15 claims for violations of the California Cartwright Act, which the Court dismissed in an order
16 dated February 6, 2012 (Dkt. No. 4786), and consist of conclusions of law, and therefore, no
17 response is required. To the extent that Paragraph 293 may be deemed to require a response, the
18 Hitachi defendants deny each of the averments of Paragraph 293.

19 294. The averments of Paragraph 294 of the Complaint relate exclusively to Plaintiff's
20 claims for violations of the California Cartwright Act, which the Court dismissed in an order
21 dated February 6, 2012 (Dkt. No. 4786), and consist of conclusions of law, and therefore, no
22 response is required. To the extent that Paragraph 294 may be deemed to require a response, the
23 Hitachi defendants deny each of the averments of Paragraph 294.

24 295. The averments of Paragraph 295 of the Complaint relate exclusively to Plaintiff's
25 claims for violations of the California Cartwright Act, which the Court dismissed in an order
26 dated February 6, 2012 (Dkt. No. 4786), and consist of conclusions of law, and therefore, no
27 response is required. To the extent that Paragraph 295 may be deemed to require a response, the
28 Hitachi defendants deny each of the averments of Paragraph 295.

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AFFIRMATIVE AND/OR ADDITIONAL DEFENSES

Without assuming the burden of proof where it rests upon plaintiff, the Hitachi defendants aver the following as separate affirmative and/or additional defenses to Plaintiff’s Complaint:

FIRST DEFENSE

(Failure To State A Claim)

Each of plaintiff’s claims or causes of action is barred, in whole or in part, because the Complaint fails to state a claim or cause of action upon which relief may be granted.

SECOND DEFENSE

(Statutes Of Limitations)

Each of plaintiff’s claims or causes of action is barred, in whole or in part, by the applicable statutes of limitations.

THIRD DEFENSE

(Claim Splitting And Election Of Remedies)

Each of plaintiff’s claims or causes of action is barred, in whole or in part, by reason of claim splitting and by the doctrine of the election of remedies.

FOURTH DEFENSE

(Laches, Estoppel, Waiver, And/Or Unclean Hands)

Each of plaintiff’s claims or causes of action is barred, in whole or in part, under the doctrine of laches, estoppel, waiver, and/or unclean hands.

FIFTH DEFENSE

(Reasonable Justification)

Each of plaintiff’s claims or causes of action is barred, in whole or in part, because all of the actions of the Hitachi defendants being challenged by plaintiff were lawful, justified, pro-competitive, constitute bona fide business competition, and were carried out in furtherance of the Hitachi defendants’ legitimate business interests.

SIXTH DEFENSE

(Ratification, Acquiescence, Agreement Or Consent)

Each of plaintiff’s claims or causes of action is barred, in whole or in part, by reason of

1 plaintiff's ratification of, or acquiescence, agreement or consent to the conduct of the Hitachi
2 defendants.

3 **SEVENTH DEFENSE**

4 **(Accord And Satisfaction, Release And Settlement)**

5 Each of plaintiff's claims or causes of action is barred, in whole or in part, by the
6 doctrines of accord and satisfaction, release and settlement.

7 **EIGHTH DEFENSE**

8 **(Government Privilege)**

9 Each of plaintiff's claims or causes of action is barred, in whole or in part, because the
10 alleged conduct of the Hitachi defendants that is the subject of the Complaint was caused by, due
11 to, based upon, or in response to directives, laws, regulations, policies, and/or acts of
12 governments, governmental agencies and entities, and/or regulatory agencies, and such is non-
13 actionable or privileged.

14 **NINTH DEFENSE**

15 **(Lack Of Standing)**

16 Each of plaintiff's claims or causes of action is barred, in whole or in part, because
17 plaintiff lacks standing to bring the claims asserted in the Complaint.

18 **TENTH DEFENSE**

19 **(Failure To Plead Fraud Particularly; Rule 9(B) Fed.R.Civ.P.)**

20 Each of plaintiff's claims or causes of action is barred, in whole or in part, because
21 plaintiff has failed to allege fraudulent concealment with particularity.

22 **ELEVENTH DEFENSE**

23 **(Ultra Vires)**

24 Each of plaintiff's claims or causes of action is barred, in whole or in part, because, to the
25 extent that any employee or agent of the Hitachi defendants engaged in any unlawful act or
26 omission, which unlawful act or omission the Hitachi defendants expressly deny, any such
27 actionable act or omission would have been committed by individuals acting ultra vires.

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TWELFTH DEFENSE

(Intervening Causes)

Each of plaintiff’s claims or causes of action is barred, in whole or in part, because plaintiff’s alleged injuries, if any, stemmed from intervening and/or superseding causes.

THIRTEENTH DEFENSE

(Lack Of Antitrust Injury)

Each of plaintiff’s claims or causes of action is barred, in whole or in part, because no plaintiff has suffered an antitrust injury.

FOURTEENTH DEFENSE

(No Act Of The Hitachi Defendants)

Each of plaintiff’s claims or causes of action is barred, in whole or in part, because no plaintiff has been injured in its business or property by reason of any action of the Hitachi defendants.

FIFTEENTH DEFENSE

(Speculative Damages)

Each of plaintiff’s claims or causes of action is barred, in whole or in part, because the plaintiff’s alleged damages, if any, are speculative and because of the impossibility of the ascertainment and allocation of such alleged damages.

SIXTEENTH DEFENSE

(Failure to Mitigate Damages)

Each of plaintiff’s claims or causes of action is barred from recovery of damages, in whole or in part, because of and to the extent of plaintiff’s failure to mitigate damages.

SEVENTEENTH DEFENSE

(Pass Through)

Plaintiff’s claims or causes of action for an illegal overcharge are barred, in whole or in part, to the extent that such overcharge, the existence of which the Hitachi defendants expressly deny, was absorbed, in whole or in part, by others, and was not passed through to plaintiff.

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EIGHTEENTH DEFENSE

(Restitution)

Each of plaintiff’s claims or causes of action is barred from recovery of damages, in whole or in part, to the extent that any restitution or award of damages to plaintiff would be excessive and punitive, and disproportionate to any alleged injury suffered by plaintiff.

NINETEENTH DEFENSE

(Available Remedy At Law)

Plaintiff’s claims or causes of action for injunction or other equitable relief are barred, in whole or in part, because plaintiff has available an adequate remedy at law.

TWENTIETH DEFENSE

(Injunction)

Plaintiff’s claims or causes of action for injunction are barred, in whole or in part, because plaintiff seeks to enjoin alleged events that have already transpired and without the requisite showing of threatened future harm or continuing violation.

TWENTY-FIRST DEFENSE

(Residency)

To the extent plaintiff seeks to assert claims or obtain relief under the laws of a state of which they are not a resident, those claims are barred by (i) constitutional rights of due process; (ii) choice of law principles; and (iii) the laws of the states under which plaintiff asserts its claims.

TWENTY-SECOND DEFENSE

(Unjust Enrichment)

Each of plaintiff’s claims or causes of action is barred, in whole or in part, because plaintiff would be unjustly enriched if it was allowed to recover any part of the damages alleged in the Complaint.

TWENTY-THIRD DEFENSE

(Improper Venue)

Each of plaintiff’s claims or causes of action is barred, in whole or in part, because venue does not lie in this Court.

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TWENTY-FOURTH DEFENSE

(Comparative Fault)

Each of plaintiff’s claims or causes of action is barred, in whole or in part, to the extent the injuries alleged in the Complaint, the fact and extent of which are expressly denied by the Hitachi defendants, were directly and proximately caused by or contributed to by the statements, acts or omissions of plaintiff or third persons or entities unaffiliated with the Hitachi defendants.

TWENTY-FIFTH DEFENSE

(Res Judicata And/Or Collateral Estoppel)

Each of plaintiff’s claims or causes of action is barred, in whole or in part, by the doctrines of res judicata and/or collateral estoppel.

TWENTY-SIXTH DEFENSE

(Foreign Trade Antitrust Improvements Act)

Each of plaintiff’s claims or causes of action is barred, in whole or in part, because plaintiff has failed to allege facts sufficient to support a claim under the Foreign Trade Antitrust Improvements Act, 15 U.S.C. § 6a.

TWENTY-SEVENTH DEFENSE

(Foreign Sales)

Each of plaintiff’s claims or causes of action is barred, in whole or in part, to the extent plaintiff seeks to recover damages, if any, based on sales outside of the United States.

TWENTY-EIGHTH DEFENSE

(Improper Joinder)

Each of plaintiff’s claims or causes of action is barred, in whole or in part, because plaintiff’s claims are improperly joined within the meaning of Rule 20 of the Federal Rules of Civil Procedure because they did not arise out of the same transaction, occurrence or series of transactions or occurrences and/or do not involve questions of law or fact common to all defendants.

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TWENTY-NINTH DEFENSE

(Failure To Exhaust Remedies)

Plaintiff’s claims or causes of action are barred, in whole or in part, because plaintiff failed to exhaust all remedies against the parties with whom each plaintiff is in privity.

THIRTIETH DEFENSE

(No Multiple Recoveries)

Each of plaintiff’s claims or causes of action is barred, in whole or in part, to the extent it would result in the Hitachi defendants paying damages to more than one claimant for the same alleged overcharge, because such multiple recoveries would violate rights guaranteed to the Hitachi defendants by applicable states’ laws and by the United States Constitution, including, without limitation, rights guaranteed under the Due Process Clause of the Fourteenth Amendment.

THIRTY-FIRST DEFENSE

(Voluntary Payment Doctrine)

Each of plaintiff’s claims or causes of action is barred, in whole or in part, by the voluntary payment doctrine, under which plaintiff is not entitled to recover payments made with full knowledge of the facts.

THIRTY-SECOND DEFENSE

(Incorporation of Defenses of Others)

The Hitachi defendants adopt by reference any applicable defense pleaded by any other defendant not otherwise expressly set forth herein.

THIRTY-THIRD DEFENSE

(Reservation Of Other Defenses)

The Hitachi defendants reserve the right to assert other defenses as this action proceeds up to and including the time of trial.

WHEREFORE, Hitachi, Ltd., Hitachi Displays, Ltd., and Hitachi Electronic Devices (USA), Inc. each pray that:

