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 10 HANNSTAR DISPLAY CORPORATION

11 UNITED STATES DISTRICT COURT  
 12 NORTHERN DISTRICT OF CALIFORNIA  
 13

14 IN RE: TFT-LCD (FLAT PANEL)  
 15 ANTITRUST LITIGATION

Master File No. M:07-1827 SI  
 MDL No. 1827

**HANNSTAR DISPLAY  
 CORPORATION’S ANSWER TO  
 AMENDED COMPLAINT FOR  
 DAMAGES AND INJUNCTIVE  
 RELIEF OF T-MOBILE U.S.A., INC.**

16 \_\_\_\_\_  
 17 This Document Relates to Individual Case No.  
 11-cv-02591-SI  
 18 T-MOBILE U.S.A., INC.,  
 19 Plaintiff,  
 20 v.  
 21 AU OPTRONICS CORPORATION, *et al.*,  
 22 Defendants.

23 Defendant HannStar Display Corporation (“HannStar”), by its undersigned  
 24 counsel, hereby answers the Amended Complaint for Damages and Injunctive Relief  
 25 (“Complaint”) of Plaintiff T-Mobile U.S.A., Inc. (“plaintiff”) and alleges affirmative  
 26 defenses. To the extent the Complaint’s allegations concern persons and/or entities  
 27 other than HannStar, HannStar denies that such allegations support any claim for relief  
 28

1 against HannStar. HannStar answers each paragraph alleged in the Complaint as  
2 follows.

3 1. With respect to Paragraph 1, HannStar denies plaintiff’s definition of  
4 the term “LCD Panels” because the definition comprises a wide variety of items of  
5 commerce that appear at many different levels of many different production chains,  
6 and that are traded in multiple markets, including multiple separate markets for  
7 different types of LCD panels and multiple separate markets for appliances containing  
8 multiple separate types of LCD panels. As defined, the term “LCD Panels” creates  
9 confusion in this paragraph and as used throughout the remainder of the Complaint.  
10 HannStar lacks knowledge or information sufficient to form a belief as to the truth of  
11 the remaining allegations contained in Paragraph 1 and, therefore, denies those  
12 allegations.

13 2. With respect to Paragraph 2, HannStar denies that there is a single  
14 “U.S. market for LCD Panels and products containing those panels.” To the extent that  
15 the allegations contained in Paragraph 2 are directed to other defendants, HannStar  
16 lacks knowledge or information sufficient to form a belief as to the truth of the  
17 allegations and, therefore, they are denied. To the extent that the allegations contained  
18 in Paragraph 2 are directed to HannStar, they are denied.

19 3. With respect to Paragraph 3, HannStar lacks knowledge or information  
20 sufficient to form a belief as to the first two sentences of Paragraph 3, and, therefore,  
21 they are denied. To the extent the allegations in Paragraph 3 purport to reference the  
22 deposition testimony of H.B. Suh, that testimony speaks for itself. To the extent that  
23 the remaining allegations of Paragraph 3 are directed to other defendants, HannStar  
24 lacks knowledge or information sufficient to form a belief as to the truth of the  
25 allegations and, therefore, they are denied. To the extent that the remaining allegations  
26 contained in the third sentence of Paragraph 3 are directed to HannStar, HannStar  
27 denies them.

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1           4.       To the extent that the allegations contained in Paragraph 4 describe the  
2 plaintiff or are directed to other defendants, HannStar lacks knowledge or information  
3 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
4 denied. To the extent that the allegations contained in Paragraph 4 are directed to  
5 HannStar, they are denied.

6           5.       The allegations contained in Paragraph 5 purport to characterize  
7 public statements and public documents, the contents of which speak for themselves  
8 and require no further response. To the extent a further response is required, HannStar  
9 responds as follows: To the extent that the allegations contained in Paragraph 5 are  
10 directed to other defendants or third parties, HannStar lacks knowledge or information  
11 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
12 denied. To the extent that the allegations are directed to HannStar, HannStar refers to  
13 the HannStar Plea Agreement<sup>1</sup> and the statements contained therein, which speak for  
14 themselves, and otherwise denies the allegations.

15           6.       The allegations contained in Paragraph 6 purport to characterize public  
16 statements and public documents, the contents of which speak for themselves and  
17 require no further response. To the extent a further response is required, HannStar  
18 responds as follows: To the extent that the allegations contained in Paragraph 6 are  
19 directed to other defendants, HannStar lacks knowledge or information sufficient to  
20 form a belief as to the truth of the allegations and, therefore, they are denied. To the  
21 extent that the allegations contained in Paragraph 6 are directed to HannStar, they are  
22 denied.

23           7.       To the extent that the allegations contained in Paragraph 7 are directed  
24 to other defendants, HannStar lacks knowledge or information sufficient to form a  
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27 <sup>1</sup> See Plea Agreement, *U.S. v. HannStar Display Corporation*, Case No. CR-10-0498SI,  
28 (N.D. Cal., July 30, 2010) (“HannStar Plea Agreement”).

1 belief as to the truth of the allegations and, therefore, they are denied. To the extent  
2 that the allegations contained in Paragraph 7 are directed to HannStar, they are denied.

3 8. Paragraph 8 consists of plaintiff's characterization of its claims and  
4 legal conclusions, to which no response is required. To the extent that Paragraph 8  
5 may be deemed to require a response, HannStar responds as follows: To the extent  
6 that the allegations contained in Paragraph 8 are directed to other defendants, HannStar  
7 lacks knowledge or information sufficient to form a belief as to the truth of the  
8 allegations and, therefore, they are denied. To the extent that the allegations contained  
9 in Paragraph 8 are directed to HannStar, HannStar they are denied.

10 9. Paragraph 9 consists of plaintiff's characterization of its claims and  
11 legal conclusions, to which no response is required. To the extent that Paragraph 9  
12 may be deemed to require a response, HannStar responds as follows: To the extent  
13 that the allegations contained in Paragraph 9 are directed to other defendants, HannStar  
14 lacks knowledge or information sufficient to form a belief as to the truth of the  
15 allegations and, therefore, they are denied. To the extent that the allegations contained  
16 in Paragraph 9 are directed to HannStar, HannStar they are denied.

17 10. Paragraph 10 consists of plaintiff's characterization of its claims, to  
18 which no response is required. To the extent that Paragraph 10 may be deemed to  
19 require a response, HannStar denies the allegations.

20 11. Paragraph 11 consists of plaintiff's characterization of its claims and  
21 legal conclusions, to which no response is required. To the extent that Paragraph 11  
22 may be deemed to require a response, HannStar responds as follows: To the extent  
23 that the allegations contained in Paragraph 11 are directed to other defendants,  
24 HannStar lacks knowledge or information sufficient to form a belief as to the truth of  
25 the allegations and, therefore, they are denied. To the extent that the allegations  
26 contained in Paragraph 11 are directed to HannStar, they are denied.

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1           12. Paragraph 12 consists of plaintiff's characterization of its claims and  
2 legal conclusions, to which no response is required. To the extent that Paragraph 12  
3 may be deemed to require a response, HannStar denies the allegations.

4           13. Paragraph 13 consists of legal conclusions to which no response is  
5 required. To the extent that Paragraph 13 may be deemed to require a response,  
6 HannStar responds as follows: To the extent that the allegations contained in  
7 Paragraph 13 are directed to other defendants, HannStar lacks knowledge or  
8 information sufficient to form a belief as to the truth of the allegations and, therefore,  
9 they are denied. To the extent that the allegations contained in Paragraph 13 are  
10 directed to HannStar, they are denied.

11           14. Paragraph 14 contains plaintiff's characterization of its claims and legal  
12 conclusions, to which no response is required. To the extent that Paragraph 14 may be  
13 deemed to require a response, HannStar denies the allegations.

14           15. Paragraph 15 consists of plaintiff's characterization of its claims and  
15 legal conclusions, to which no response is required. To the extent that Paragraph 15  
16 may be deemed to require a response, they are denied.

17           16. Paragraph 16 contains plaintiff's characterization of its claims and legal  
18 conclusions, to which no response is required. To the extent that Paragraph 16 may be  
19 deemed to require a response, HannStar denies the allegations.

20           17. HannStar admits that Paragraph 17 describes in a general and less than  
21 comprehensive manner some aspects of certain liquid crystal display panels, but denies  
22 that this description is comprehensive or entirely accurate and denies the allegations on  
23 that basis. The remaining allegations of Paragraph 17 are explanations of a  
24 terminology to which no response is required.

25           18. HannStar lacks knowledge and information sufficient to form a belief as  
26 to the allegations in the first sentence of Paragraph 18 and, therefore, they are denied.  
27 To the extent that the remaining allegations of Paragraph 18 are directed to other  
28 defendants, HannStar lacks knowledge or information sufficient to form a belief as to

1 the truth of the allegations and, therefore, they are denied. To the extent that the  
2 allegations contained in the second sentence of Paragraph 18 are directed to HannStar,  
3 they are denied.

4 19. Paragraph 19 consists of plaintiff's definition of a term for purposes of  
5 the Complaint, to which no response is required.

6 20. Paragraph 20 consists of plaintiff's definition of a term for purposes of  
7 the Complaint, to which no response is required.

8 21. Paragraph 21 consists of plaintiff's definition of a term for purposes of  
9 the Complaint, to which no response is required.

10 22. HannStar lacks knowledge or information sufficient to form a belief as  
11 to the truth of the allegations contained the first three sentences of Paragraph 22 and,  
12 therefore, denies those allegations. With respect to the remaining allegations in  
13 Paragraph 22, to the extent that they are directed to other defendants, HannStar lacks  
14 knowledge or information sufficient to form a belief as to the truth of the allegations  
15 and, therefore, they are denied. To the extent that these remaining allegations are  
16 directed to HannStar, they are denied.

17 23. With respect to Paragraph 23, HannStar denies the allegations of the  
18 second sentence to the extent they are direct to HannStar. HannStar lacks knowledge  
19 or information sufficient to form a belief as to the truth of the remaining allegations  
20 and, therefore, they are denied.

21 24. With respect to Paragraph 24, HannStar lacks knowledge or  
22 information sufficient to form a belief as to the truth of the allegations in the first  
23 sentence and, therefore, they are denied. To the extent that the remaining allegations  
24 contained in Paragraph 24 are directed to HannStar, HannStar denies the allegations.

25 25. HannStar lacks knowledge or information sufficient to form a belief  
26 as to the truth of the allegations contained the first two sentences of Paragraph 25 and,  
27 therefore, denies those allegations.

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1           26.       To the extent that the allegations contained in Paragraph 26 describe  
2 the plaintiff or are directed to other defendants, HannStar lacks knowledge or  
3 information sufficient to form a belief as to the truth of the allegations and, therefore,  
4 they are denied. To the extent that the allegations contained in the last sentence of  
5 Paragraph 26 are directed to HannStar, HannStar denies the allegations.

6           27.       To the extent that the allegations contained in Paragraph 27 describe  
7 the plaintiff or are directed to other defendants, HannStar lacks knowledge or  
8 information sufficient to form a belief as to the truth of the allegations and, therefore,  
9 they are denied. To the extent that the allegations contained in Paragraph 27 are  
10 directed to HannStar, HannStar denies the allegations.

11          28.       HannStar lacks knowledge or information sufficient to form a belief  
12 as to the truth of the allegations contained the first two sentences of Paragraph 28 and,  
13 therefore, denies those allegations.

14          29.       Paragraph 29 is directed to another defendant. Accordingly, HannStar  
15 lacks knowledge or information sufficient to form a belief as to the truth of the  
16 allegations contained in Paragraph 29 and, therefore, denies those allegations.

17          30.       Paragraph 30 is directed to another defendant. Accordingly, HannStar  
18 lacks knowledge or information sufficient to form a belief as to the truth of the  
19 allegations contained in Paragraph 30 and, therefore, denies those allegations.

20          31.       The first sentence of Paragraph 31 defines a term for purposes of the  
21 Complaint, to which no response is required. To the extent the remaining allegations  
22 of Paragraph 31 are directed to other defendants, HannStar lacks knowledge or  
23 information sufficient to form a belief as to their truth and, therefore, they are denied.  
24 To the extent the remaining allegations of Paragraph 31 are directed at HannStar, they  
25 are denied.

26          32.       Paragraph 32 is directed to another defendant. Accordingly, HannStar  
27 lacks knowledge or information sufficient to form a belief as to the truth of the  
28 allegations contained in Paragraph 32 and, therefore, denies those allegations.

1           33. Paragraph 33 is directed to another defendant. Accordingly, HannStar  
2 lacks knowledge or information sufficient to form a belief as to the truth of the  
3 allegations contained in Paragraph 33 and, therefore, denies those allegations.

4           34. Paragraph 34 is directed to another defendant. Accordingly, HannStar  
5 lacks knowledge or information sufficient to form a belief as to the truth of the  
6 allegations contained in Paragraph 34 and, therefore, denies those allegations.

7           35. Paragraph 35 is directed to another defendant. Accordingly, HannStar  
8 lacks knowledge or information sufficient to form a belief as to the truth of the  
9 allegations contained in Paragraph 35 and, therefore, denies those allegations.

10          36. Paragraph 36 is directed to another defendant. Accordingly, HannStar  
11 lacks knowledge or information sufficient to form a belief as to the truth of the  
12 allegations contained in Paragraph 36 and, therefore, denies those allegations.

13          37. Paragraph 37 is directed to another defendant. Accordingly, HannStar  
14 lacks knowledge or information sufficient to form a belief as to the truth of the  
15 allegations contained in Paragraph 37 and, therefore, denies those allegations.

16          38. The first sentence of Paragraph 38 defines a term for purposes of the  
17 Complaint, to which no response is required. To the extent the remaining allegations  
18 Paragraph 38 are directed to other defendants, HannStar lacks knowledge or  
19 information sufficient to form a belief as to their truth and, therefore, they are denied.  
20 To the extent the allegations in Paragraph 38 are directed at HannStar, they are denied.

21          39. Paragraph 39 is directed to another defendant. Accordingly, HannStar  
22 lacks knowledge or information sufficient to form a belief as to the truth of the  
23 allegations contained in Paragraph 39 and, therefore, denies those allegations.

24          40. Paragraph 40 is directed to another defendant. Accordingly, HannStar  
25 lacks knowledge or information sufficient to form a belief as to the truth of the  
26 allegations contained in Paragraph 40 and, therefore, denies those allegations.

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1           41. Paragraph 41 is directed to another defendant. Accordingly, HannStar  
2 lacks knowledge or information sufficient to form a belief as to the truth of the  
3 allegations contained in Paragraph 41 and, therefore, denies those allegations.

4           42. The first sentence of Paragraph 42 defines a term for purposes of the  
5 Complaint, to which no response is required. The remainder of Paragraph 42 is  
6 directed to other defendants. Accordingly, HannStar lacks knowledge or information  
7 sufficient to form a belief as to the truth of the allegations contained in Paragraph 42  
8 and, therefore, denies those allegations.

9           43. To the extent the allegations in Paragraph 43 are directed to other  
10 defendants, HannStar lacks knowledge or information sufficient to form a belief as to  
11 the truth of the allegations contained in Paragraph 43 and, therefore, denies those  
12 allegations. To the extent the allegations in Paragraph 43 are directed at HannStar,  
13 they are denied.

14           44. Paragraph 44 is directed to another defendant. Accordingly, HannStar  
15 lacks knowledge or information sufficient to form a belief as to the truth of the  
16 allegations contained in Paragraph 44 and, therefore, denies those allegations.

17           45. Paragraph 45 is directed to another defendant. Accordingly, HannStar  
18 lacks knowledge or information sufficient to form a belief as to the truth of the  
19 allegations contained in Paragraph 45 and, therefore, denies those allegations.

20           46. Paragraph 46 is directed to another defendant. Accordingly, HannStar  
21 lacks knowledge or information sufficient to form a belief as to the truth of the  
22 allegations contained in Paragraph 46 and, therefore, denies those allegations.

23           47. The first sentence of Paragraph 47 defines a term for purposes of the  
24 Complaint, to which no response is required. To the extent the remaining allegations  
25 of Paragraph 47 are directed to other defendants, HannStar lacks knowledge or  
26 information sufficient to form a belief as to their truth and, therefore, they are denied.  
27 To the extent the remaining allegations in Paragraph 47 are directed at HannStar, they  
28 are denied.

1           48.     HannStar admits that it is a Taiwanese company with its principal place  
2 of business at No. 480, Rueiguang Road, 12th Floor, Neihu Chiu, Taipei 114, Taiwan,  
3 and that it manufactured and sold certain TFT-LCD panels in certain years of the  
4 alleged “Conspiracy Period.” HannStar denies the remainder of the allegations  
5 contained in Paragraph 48.

6           49.     Paragraph 49 is directed to another defendant. Accordingly, HannStar  
7 lacks knowledge or information sufficient to form a belief as to the truth of the  
8 allegations contained in Paragraph 49 and, therefore, denies those allegations.

9           50.     Paragraph 50 is directed to another defendant. Accordingly, HannStar  
10 lacks knowledge or information sufficient to form a belief as to the truth of the  
11 allegations contained in Paragraph 50 and, therefore, denies those allegations.

12          51.     Paragraph 51 is directed to another defendant. Accordingly, HannStar  
13 lacks knowledge or information sufficient to form a belief as to the truth of the  
14 allegations contained in Paragraph 51 and, therefore, denies those allegations.

15          52.     Paragraph 52 defines a term for purposes of the Complaint, to which no  
16 response is required.

17          53.     Paragraph 53 is directed to another defendant. Accordingly, HannStar  
18 lacks knowledge or information sufficient to form a belief as to the truth of the  
19 allegations contained in Paragraph 53 and, therefore, denies those allegations.

20          54.     Paragraph 54 is directed to another defendant. Accordingly, HannStar  
21 lacks knowledge or information sufficient to form a belief as to the truth of the  
22 allegations contained in Paragraph 54 and, therefore, denies those allegations.

23          55.     The first sentence of Paragraph 55 defines a term for purposes of the  
24 Complaint, to which no response is required. To the extent the remaining allegations  
25 of Paragraph 55 are directed to other defendants, HannStar lacks knowledge or  
26 information sufficient to form a belief as to their truth and, therefore, they are denied.  
27 To the extent the remaining allegations in Paragraph 55 are directed at HannStar, they  
28 are denied.

1           56. Paragraph 56 is directed to another defendant. Accordingly, HannStar  
2 lacks knowledge or information sufficient to form a belief as to the truth of the  
3 allegations contained in Paragraph 56 and, therefore, denies those allegations.

4           57. The first five sentences of Paragraph 57 are directed to another  
5 defendant. Accordingly, HannStar lacks knowledge or information sufficient to form a  
6 belief as to the truth of the allegations contained in the first five sentences of Paragraph  
7 57 and, therefore, denies those allegations. To the extent that the remaining allegations  
8 contained in Paragraph 57 are directed to other defendants, HannStar lacks knowledge  
9 or information sufficient to form a belief as to the truth of the allegations and,  
10 therefore, they are denied. To the extent that the remaining allegations contained in  
11 Paragraph 57 are directed to HannStar, they are denied.

12           58. To the extent that the allegations contained in Paragraph 58 are directed  
13 to other defendants, HannStar lacks knowledge or information sufficient to form a  
14 belief as to the truth of the allegations and, therefore, they are denied. To the extent  
15 that the allegations contained in Paragraph 58 are directed to HannStar, they are  
16 denied.

17           59. Paragraph 59 is directed to another defendant. Accordingly, HannStar  
18 lacks knowledge or information sufficient to form a belief as to the truth of the  
19 allegations contained in Paragraph 59 and, therefore, denies those allegations.

20           60. Paragraph 60 is directed to another defendant. Accordingly, HannStar  
21 lacks knowledge or information sufficient to form a belief as to the truth of the  
22 allegations contained in Paragraph 60 and, therefore, denies those allegations.

23           61. Paragraph 61 is directed to another defendant. Accordingly, HannStar  
24 lacks knowledge or information sufficient to form a belief as to the truth of the  
25 allegations contained in Paragraph 61 and, therefore, denies those allegations.

26           62. Paragraph 62 is directed to another defendant. Accordingly, HannStar  
27 lacks knowledge or information sufficient to form a belief as to the truth of the  
28 allegations contained in Paragraph 62 and, therefore, denies those allegations.

1           63. Paragraph 63 is directed to another defendant. Accordingly, HannStar  
2 lacks knowledge or information sufficient to form a belief as to the truth of the  
3 allegations contained in Paragraph 63 and, therefore, denies those allegations.

4           64. The first sentence of Paragraph 64 defines a term for purposes of the  
5 Complaint, to which no response is required. To the extent the remaining allegations  
6 of Paragraph 64 are directed to other defendants, HannStar lacks knowledge or  
7 information sufficient to form a belief as to their truth and, therefore, they are denied.  
8 To the extent the remaining allegations in Paragraph 64 are directed at HannStar, they  
9 are denied.

10          65. Paragraph 65 is directed to another defendant. Accordingly, HannStar  
11 lacks knowledge or information sufficient to form a belief as to the truth of the  
12 allegations contained in Paragraph 65 and, therefore, they are denied. To the extent the  
13 allegations in Paragraph 65 are directed to Hannstar, they are denied.

14          66. Paragraph 66 is directed to other defendants. Accordingly, HannStar  
15 lacks knowledge or information sufficient to form a belief as to the truth of the  
16 allegations contained in Paragraph 66 and, therefore, denies those allegations. To the  
17 extent that the allegations in the second sentence of Paragraph 66 are based upon  
18 public statements or public documents, those statements or documents speak for  
19 themselves and no response is required. To the extent that the allegations contained in  
20 Paragraph 66 are directed to HannStar, they are denied.

21          67. Paragraph 67 is directed to other defendants. Accordingly, HannStar  
22 lacks knowledge or information sufficient to form a belief as to the truth of the  
23 allegations contained in Paragraph 67 and, therefore, denies those allegations.

24          68. Paragraph 68 is directed to other defendants. Accordingly, HannStar  
25 lacks knowledge or information sufficient to form a belief as to the truth of the  
26 allegations contained in Paragraph 68 and, therefore, denies those allegations.

27          69. The first sentence of Paragraph 69 defines a term for purposes of the  
28 Complaint, to which no response is required. To the extent the remaining allegations

1 of Paragraph 69 are directed to other defendants, HannStar lacks knowledge or  
2 information sufficient to form a belief as to their truth and, therefore, they are denied.  
3 To the extent the allegations in Paragraph 69 are directed at HannStar, they are denied.

4 70. Paragraph 70 is directed to another defendant. Accordingly, HannStar  
5 lacks knowledge or information sufficient to form a belief as to the truth of the  
6 allegations contained in Paragraph 70 and, therefore, denies those allegations.

7 71. The first sentence of Paragraph 71 defines a term for purposes of the  
8 Complaint, to which no response is required. To the extent the remaining allegations  
9 of Paragraph 71 are directed to another defendant, HannStar lacks knowledge or  
10 information sufficient to form a belief as to the truth of the allegations contained in  
11 Paragraph 71 and, therefore, they are denied. To the extent the allegations in  
12 Paragraph 71 are directed at HannStar, they are denied.

13 72. Paragraph 72 is directed to another defendant. Accordingly, HannStar  
14 lacks knowledge or information sufficient to form a belief as to the truth of the  
15 allegations contained in Paragraph 72 and, therefore, denies those allegations.

16 73. Paragraph 73 is directed to another defendant. Accordingly, HannStar  
17 lacks knowledge or information sufficient to form a belief as to the truth of the  
18 allegations contained in Paragraph 73 and, therefore, denies those allegations.

19 74. The first sentence of Paragraph 74 defines a term for purposes of the  
20 Complaint, to which no response is required. To the extent the remaining allegations  
21 of Paragraph 74 are directed to another defendant, HannStar lacks knowledge or  
22 information sufficient to form a belief as to their truth and, therefore, they are denied.  
23 To the extent the allegations in Paragraph 74 are directed at HannStar, they are denied.

24 75. Paragraph 75 is directed to another defendant. Accordingly, HannStar  
25 lacks knowledge or information sufficient to form a belief as to the truth of the  
26 allegations contained in Paragraph 75 and, therefore, denies those allegations.

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1           76. Paragraph 76 is directed to another defendant. Accordingly, HannStar  
2 lacks knowledge or information sufficient to form a belief as to the truth of the  
3 allegations contained in Paragraph 76 and, therefore, denies those allegations.

4           77. Paragraph 77 is directed to another defendant. Accordingly, HannStar  
5 lacks knowledge or information sufficient to form a belief as to the truth of the  
6 allegations contained in Paragraph 77 and, therefore, denies those allegations.

7           78. Paragraph 78 is directed to another defendant. Accordingly, HannStar  
8 lacks knowledge or information sufficient to form a belief as to the truth of the  
9 allegations contained in Paragraph 78 and, therefore, denies those allegations.

10          79. The first sentence of Paragraph 79 defines a term for purposes of the  
11 Complaint, to which no response is required. To the extent the remaining allegations  
12 of Paragraph 79 are directed to another defendant, HannStar lacks knowledge or  
13 information sufficient to form a belief as to their truth and, therefore, they are denied.  
14 To the extent the allegations in Paragraph 79 are directed at HannStar, they are denied.

15          80. To the extent that the allegations contained in Paragraph 80 are directed  
16 to other defendants, HannStar lacks knowledge or information sufficient to form a  
17 belief as to the truth of the allegations and, therefore, they are denied. To the extent the  
18 allegations in Paragraph 80 are directed at HannStar, they are denied.

19          81. To the extent that the allegations contained in Paragraph 81 are directed  
20 to other defendants, HannStar lacks knowledge or information sufficient to form a  
21 belief as to the truth of the allegations and, therefore, they are denied. To the extent  
22 that the allegations contained in Paragraph 81 are directed to HannStar, HannStar  
23 denies the allegations.

24          82. To the extent that the allegations contained in Paragraph 82 are directed  
25 to other defendants or third parties, HannStar lacks knowledge or information  
26 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
27 denied. To the extent the allegations in Paragraph 82 are directed at HannStar, they are  
28 denied.

1           83.     To the extent that the allegations contained in Paragraph 83 are directed  
2 to other defendants or third parties, HannStar lacks knowledge or information  
3 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
4 denied. To the extent the allegations in Paragraph 83 are directed at HannStar, they are  
5 denied.

6           84.     To the extent that the allegations contained in Paragraph 84 are directed  
7 to other defendants, HannStar lacks knowledge or information sufficient to form a  
8 belief as to the truth of the allegations and, therefore, they are denied. To the extent the  
9 allegations in Paragraph 84 are directed at HannStar, they are denied.

10          85.     With respect to Paragraph 85, HannStar admits that LCD panels are  
11 used in certain electronic products. HannStar denies the remaining allegations in  
12 Paragraph 85.

13          86.     HannStar lacks knowledge or information sufficient to form a belief as  
14 to the truth of the allegations contained in Paragraph 86 and, therefore, they are denied.

15          87.     With respect to Paragraph 87, HannStar denies that there is a single  
16 “market” for LCD panels. HannStar lacks knowledge or information sufficient to form  
17 a belief as to the truth of the remaining allegations contained in Paragraph 87 and,  
18 therefore, they are denied.

19          88.     With respect to Paragraph 88, HannStar denies that there is a single  
20 “market” for LCD panels or that there is a single “market” for LCD products.  
21 HannStar lacks knowledge or information sufficient to form a belief as to the truth of  
22 the remaining allegations contained in Paragraph 88 and, therefore, they are denied.

23          89.     HannStar lacks knowledge or information sufficient to form a belief as  
24 to the truth of the allegations contained in Paragraph 89 and, therefore, they are denied.

25          90.     To the extent that the allegations contained in Paragraph 90 are directed  
26 to other defendants, HannStar lacks knowledge or information sufficient to form a  
27 belief as to the truth of the allegations and, therefore, they are denied. To the extent  
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1 that the remaining allegations contained in Paragraph 90 are directed to HannStar, they  
2 are denied.

3 91. With respect to Paragraph 91, HannStar denies that there is a single  
4 LCD panel “industry.” To the extent that the allegations contained in Paragraph 91 are  
5 directed to other defendants, HannStar lacks knowledge or information sufficient to  
6 form a belief as to the truth of the allegations and, therefore, they are denied. To the  
7 extent that the allegations contained in Paragraph 91 are directed to HannStar, they are  
8 denied.

9 92. With respect to Paragraph 92, HannStar denies that there is a single  
10 LCD panel “industry” or that there is a single “market” for LCD panels. To the extent  
11 that the remaining allegations contained in Paragraph 92 are directed to other  
12 defendants, HannStar lacks knowledge or information sufficient to form a belief as to  
13 the truth of the allegations and, therefore, they are denied. To the extent that the  
14 remaining allegations contained in Paragraph 92 are directed to HannStar, they are  
15 denied.

16 93. With respect to Paragraph 93, HannStar denies that there is a single  
17 LCD “industry.” To the extent that the allegations contained in Paragraph 93 are  
18 directed to other defendants, HannStar lacks knowledge or information sufficient to  
19 form a belief as to the truth of the allegations and, therefore, they are denied. To the  
20 extent that the allegations contained in Paragraph 93 are directed to HannStar, they are  
21 denied.

22 94. To the extent that the allegations contained in Paragraph 94 are directed  
23 to other defendants, HannStar lacks knowledge or information sufficient to form a  
24 belief as to the truth of the allegations and, therefore, they are denied. To the extent  
25 that the allegations contained in Paragraph 94 are directed to HannStar, they are  
26 denied.

27 95. With respect to Paragraph 95, HannStar denies that there is a single  
28 LCD panel “industry.” The remainder of Paragraph 95 is directed to other defendants.



1 Accordingly, HannStar lacks knowledge or information sufficient to form a belief as to  
2 the truth of the allegations contained in Paragraph 95 and, therefore, denies those  
3 allegations. To the extent that the allegations in Paragraph 95 are directed to HannStar,  
4 they are denied.

5 96. With respect to Paragraph 96, HannStar denies that there is a single  
6 LCD panel “industry.” To the extent that the allegations contained in Paragraph 96 are  
7 directed to other defendants, HannStar lacks knowledge or information sufficient to  
8 form a belief as to the truth of the allegations and, therefore, they are denied. To the  
9 extent the allegations in Paragraph 96 are directed at HannStar, they are denied.

10 97. To the extent that the allegations contained in Paragraph 97 are directed  
11 to other defendants or third parties, HannStar lacks knowledge or information  
12 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
13 denied. To the extent the allegations in Paragraph 97 are directed at HannStar, they are  
14 denied.

15 98. HannStar lacks knowledge or information sufficient to form a belief as  
16 to the allegations in the first sentence of Paragraph 98 and, therefore, they are denied.  
17 To the extent that the remaining allegations contained in Paragraph 98 are directed to  
18 other defendants, HannStar lacks knowledge or information sufficient to form a belief  
19 as to the truth of the allegations and, therefore, they are denied. To the extent that the  
20 remaining allegations contained in Paragraph 98 are directed to HannStar, they are  
21 denied.

22 99. To the extent that the allegations contained in Paragraph 99 are directed  
23 to other defendants, HannStar lacks knowledge or information sufficient to form a  
24 belief as to the truth of the allegations and, therefore, they are denied. To the extent  
25 that the allegations contained in Paragraph 99 are directed to HannStar, they are  
26 denied.

27 100. To the extent that the allegations contained in Paragraph 100 are  
28 directed to other defendants, HannStar lacks knowledge or information sufficient to

1 form a belief as to the truth of the allegations and, therefore, they are denied. To the  
2 extent that the allegations contained in Paragraph 100 are directed to HannStar, they  
3 are denied.

4 101. To the extent that the allegations contained in Paragraph 101 are  
5 directed to other defendants, HannStar lacks knowledge or information sufficient to  
6 form a belief as to the truth of the allegations and, therefore, they are denied. To the  
7 extent that the allegations contained in Paragraph 101 are directed to HannStar, they  
8 are denied.

9 102. To the extent that the allegations contained in Paragraph 102 are  
10 directed to other defendants, HannStar lacks knowledge or information sufficient to  
11 form a belief as to the truth of the allegations and, therefore, they are denied. To the  
12 extent that the allegations contained in Paragraph 102 are directed to HannStar, they  
13 are denied.

14 103. To the extent Paragraph 103 purports to characterize deposition  
15 transcripts and written discovery responses, that discovery speaks for itself and no  
16 response is required. To the extent that the remaining allegations contained in  
17 Paragraph 103 are directed to other defendants, HannStar lacks knowledge or  
18 information sufficient to form a belief as to the truth of the allegations and, therefore,  
19 they are denied. To the extent that the remaining allegations contained in Paragraph  
20 103 are directed to HannStar, they are denied.

21 104. To the extent Paragraph 104 purports to characterize deposition  
22 transcripts and written discovery responses, that discovery speaks for itself and no  
23 response is required. Paragraph 104 is directed to other defendants or third parties.  
24 Accordingly, HannStar HannStar lacks knowledge or information sufficient to form a  
25 belief as to the truth of the allegations in Paragraph 104 and, therefore, they are denied.

26 105. To the extent that the allegations in Paragraph 105 are based upon  
27 deposition statements and written discovery responses, that discovery speaks for itself  
28 and requires no response. To the extent that the remaining allegations of Paragraph

1 105 are directed to other defendants or third parties, HannStar HannStar lacks  
2 knowledge or information sufficient to form a belief as to their truth and, therefore,  
3 they are denied. To the extent the remaining allegations in Paragraph in 105 are  
4 directed to Hannstar, they are denied.

5 106. With respect to Paragraph 106, HannStar denies that there is a single  
6 LCD panel “market.” HannStar lacks knowledge or information sufficient to form a  
7 belief as to the truth of the remaining allegations in Paragraph 106 and, therefore, they  
8 are denied.

9 107. To the extent that the allegations contained in Paragraph 107 are  
10 directed to other defendants, HannStar lacks knowledge or information sufficient to  
11 form a belief as to the truth of the allegations and, therefore, they are denied. To the  
12 extent that the allegations contained in Paragraph 107 are directed to HannStar, they  
13 are denied.

14 108. HannStar lacks knowledge or information sufficient to form a belief as  
15 to the truth of the allegations in Paragraph 108 and, therefore, they are denied.

16 109. To the extent that the allegations contained in Paragraph 109 are  
17 directed to other defendants or third parties, HannStar lacks knowledge or information  
18 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
19 denied. To the extent that the allegations contained in Paragraph 109 are directed to  
20 HannStar, they are denied.

21 110. To the extent that the allegations contained in Paragraph 110 are  
22 directed to other defendants, HannStar lacks knowledge or information sufficient to  
23 form a belief as to the truth of the allegations and, therefore, they are denied. To the  
24 extent that the allegations contained in Paragraph 110 are directed to HannStar, they  
25 are denied.

26 111. HannStar lacks knowledge or information sufficient to form a belief as  
27 to the truth of the allegations in Paragraph 111 and, therefore, they are denied.

28

1           112. To the extent that the allegations contained in Paragraph 112 are  
2 directed to other defendants, HannStar lacks knowledge or information sufficient to  
3 form a belief as to the truth of the allegations and, therefore, they are denied. To the  
4 extent that the allegations contained in Paragraph 112 are directed to HannStar, they  
5 are denied.

6           113. To the extent that the allegations contained in Paragraph 113 are  
7 directed to other defendants, HannStar lacks knowledge or information sufficient to  
8 form a belief as to the truth of the allegations and, therefore, they are denied. To the  
9 extent that the allegations contained in Paragraph 113 are directed to HannStar, they  
10 are denied.

11           114. To the extent that the allegations contained in Paragraph 114 are  
12 directed to other defendants, HannStar lacks knowledge or information sufficient to  
13 form a belief as to the truth of the allegations and, therefore, they are denied. To the  
14 extent that the allegations contained in Paragraph 114 are directed to HannStar, they  
15 are denied.

16           115. To the extent that the allegations contained in Paragraph 115 are  
17 directed to other defendants, HannStar lacks knowledge or information sufficient to  
18 form a belief as to the truth of the allegations and, therefore, they are denied. To the  
19 extent that the allegations contained in Paragraph 115 are directed to HannStar, they  
20 are denied.

21           116. To the extent that the allegations contained in Paragraph 116 are  
22 directed to other defendants, HannStar lacks knowledge or information sufficient to  
23 form a belief as to the truth of the allegations and, therefore, they are denied. To the  
24 extent that the allegations contained in Paragraph 116 are directed to HannStar, they  
25 are denied.

26           117. To the extent that the allegations contained in Paragraph 117 are  
27 directed to other defendants, HannStar lacks knowledge or information sufficient to  
28 form a belief as to the truth of the allegations and, therefore, they are denied. To the

1 extent that the allegations contained in Paragraph 117 are directed to HannStar, they  
2 are denied.

3 118. To the extent that the allegations contained in Paragraph 118 are  
4 directed to other defendants, HannStar lacks knowledge or information sufficient to  
5 form a belief as to the truth of the allegations and, therefore, they are denied. To the  
6 extent that the allegations contained in Paragraph 118 are directed to HannStar, they  
7 are denied.

8 119. To the extent that the allegations contained in Paragraph 119 are  
9 directed to other defendants or third parties, HannStar lacks knowledge or information  
10 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
11 denied. To the extent that the allegations contained in Paragraph 119 are directed to  
12 HannStar, they are denied.

13 120. To the extent that the allegations contained in Paragraph 120 are  
14 directed to other defendants or third parties, HannStar lacks knowledge or information  
15 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
16 denied. To the extent that the allegations contained in Paragraph 120 are directed to  
17 HannStar, they are denied.

18 121. To the extent that the allegations contained in Paragraph 121 are  
19 directed to other defendants or third parties, HannStar lacks knowledge or information  
20 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
21 denied. To the extent that the allegations contained in Paragraph 121 are directed to  
22 HannStar, they are denied.

23 122. To the extent that the allegations contained in Paragraph 122 are  
24 directed to other defendants or third parties, HannStar lacks knowledge or information  
25 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
26 denied. To the extent that the allegations contained in Paragraph 122 are directed to  
27 HannStar, they are denied.

28

1           123.     To the extent that the allegations contained in Paragraph 123 are  
2 directed to other defendants or third parties, HannStar lacks knowledge or information  
3 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
4 denied. To the extent that the allegations contained in Paragraph 123 are directed to  
5 HannStar, they are denied.

6           124.     To the extent that the allegations contained in Paragraph 124 are  
7 directed to other defendants, HannStar lacks knowledge or information sufficient to  
8 form a belief as to the truth of the allegations and, therefore, they are denied. To the  
9 extent that the allegations contained in Paragraph 124 are directed to HannStar, they  
10 are denied.

11          125.     To the extent that the allegations in Paragraph 125 are based upon  
12 public testimony, such testimony speaks for itself and no response is required. To the  
13 extent that a response to Paragraph 125 is deemed required, HannStar responds as  
14 follows: To the extent that the allegations contained in Paragraph 125 are directed to  
15 other defendants or third parties, HannStar lacks knowledge or information sufficient  
16 to form a belief as to their truth and, therefore, denies those allegations. To the extent  
17 the allegations of Paragraph 125 are directed at HannStar, they are denied.

18          126.     To the extent that the allegations in Paragraph 126 are based upon  
19 public testimony, such testimony speaks for itself and no response is required. To the  
20 extent that a response to Paragraph 126 is deemed required, HannStar responds as  
21 follows: To the extent that the allegations contained in Paragraph 126 are directed to  
22 other defendants or third parties, HannStar lacks knowledge or information sufficient  
23 to form a belief as to their truth and, therefore, denies those allegations. To the extent  
24 the allegations of Paragraph 126 are directed at HannStar, they are denied.

25          127.     To the extent that the allegations contained in Paragraph 127 are  
26 directed to other defendants or third parties, HannStar lacks knowledge or information  
27 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
28

1 denied. To the extent that the allegations contained in Paragraph 127 are directed to  
2 HannStar, they are denied.

3 128. To the extent that the allegations contained in Paragraph 128 are  
4 directed to other defendants, HannStar lacks knowledge or information sufficient to  
5 form a belief as to the truth of the allegations and, therefore, they are denied. To the  
6 extent that the allegations contained in Paragraph 128 are directed to HannStar, they  
7 are denied.

8 129. To the extent that the allegations contained in Paragraph 129 are  
9 directed to other defendants or third parties, HannStar lacks knowledge or information  
10 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
11 denied. To the extent that the allegations contained in Paragraph 129 are directed to  
12 HannStar, they are denied.

13 130. To the extent that the allegations contained in Paragraph 130 are  
14 directed to other defendants, HannStar lacks knowledge or information sufficient to  
15 form a belief as to the truth of the allegations and, therefore, they are denied. To the  
16 extent that the allegations contained in Paragraph 130 are directed to HannStar, they  
17 are denied.

18 131. To the extent that the allegations contained in Paragraph 131 are  
19 directed to other defendants or third parties, HannStar lacks knowledge or information  
20 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
21 denied. To the extent that the allegations contained in Paragraph 131 are directed to  
22 HannStar, they are denied.

23 132. To the extent that the allegations contained in Paragraph 132 are  
24 directed to other defendants or third parties, HannStar lacks knowledge or information  
25 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
26 denied. To the extent that the allegations contained in Paragraph 132 are directed to  
27 HannStar, they are denied.

28

1           133.     To the extent that the allegations contained in Paragraph 133 are  
2 directed to other defendants or third parties, HannStar lacks knowledge or information  
3 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
4 denied. To the extent that the allegations contained in Paragraph 133 are directed to  
5 HannStar, they are denied.

6           134.     To the extent that the allegations contained in Paragraph 134 are  
7 directed to other defendants, HannStar lacks knowledge or information sufficient to  
8 form a belief as to the truth of the allegations and, therefore, they are denied. To the  
9 extent that the allegations contained in Paragraph 134 are directed to HannStar, they  
10 are denied.

11           135.     Hannstar denies the allegations in Paragraph 135

12           136.     To the extent that the allegations contained in Paragraph 136 are  
13 directed to other defendants or third parties, HannStar lacks knowledge or information  
14 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
15 denied. To the extent that the allegations contained in Paragraph 136 are directed to  
16 HannStar, they are denied.

17           137.     To the extent that the allegations contained in Paragraph 137 are  
18 directed to other defendants or third parties, HannStar lacks knowledge or information  
19 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
20 denied. To the extent that the allegations contained in Paragraph 137 are directed to  
21 HannStar, they are denied.

22           138.     To the extent that the allegations contained in Paragraph 138 are  
23 directed to other defendants or third parties, HannStar lacks knowledge or information  
24 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
25 denied. To the extent that the allegations contained in Paragraph 138 are directed to  
26 HannStar, they are denied.

27           139.     To the extent that the allegations contained in Paragraph 139 are  
28 directed to other defendants or third parties, HannStar lacks knowledge or information



1 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
2 denied. To the extent that the allegations contained in Paragraph 139 are directed to  
3 HannStar, they are denied.

4 140. To the extent that the allegations contained in Paragraph 140 are  
5 directed to other defendants or third parties, HannStar lacks knowledge or information  
6 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
7 denied. To the extent that the allegations contained in Paragraph 140 are directed to  
8 HannStar, they are denied.

9 141. To the extent that the allegations contained in Paragraph 141 are  
10 based upon statements in public documents or plea agreements, such statements speak  
11 for themselves and require no response. To the extent that the remaining allegations in  
12 Paragraph 141 are directed to other defendants or third parties, HannStar lacks  
13 knowledge or information sufficient to form a belief as to the truth of the allegations  
14 and, therefore, they are denied. To the extent that the remaining allegations contained  
15 in Paragraph 141 are directed to HannStar, they are denied.

16 142. To the extent that the allegations contained in Paragraph 142 are  
17 based upon statements in public documents or plea agreements, such statements speak  
18 for themselves and require no response. To the extent that the remaining allegations in  
19 Paragraph 142 are directed to other defendants or third parties, HannStar lacks  
20 knowledge or information sufficient to form a belief as to the truth of the allegations  
21 and, therefore, they are denied. To the extent that the remaining allegations contained  
22 in Paragraph 142 are directed to HannStar, they are denied.

23 143. To the extent that the allegations contained in Paragraph 143 are  
24 directed to other defendants or third parties, HannStar lacks knowledge or information  
25 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
26 denied. To the extent that the allegations contained in Paragraph 143 are directed to  
27 HannStar, they are denied.

28

1           144.     To the extent that the allegations contained in Paragraph 144 are  
2 directed to other defendants or third parties, HannStar lacks knowledge or information  
3 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
4 denied. To the extent that the allegations contained in Paragraph 144 are directed to  
5 HannStar, they are denied.

6           145.     To the extent that the allegations contained in Paragraph 145 are  
7 directed to other defendants or third parties, HannStar lacks knowledge or information  
8 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
9 denied. To the extent that the allegations contained in Paragraph 145 are directed to  
10 HannStar, they are denied.

11          146.     To the extent that the allegations contained in Paragraph 146 are  
12 directed to other defendants or third parties, HannStar lacks knowledge or information  
13 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
14 denied. To the extent that the allegations contained in Paragraph 146 are directed to  
15 HannStar, they are denied.

16          147.     To the extent that the allegations contained in Paragraph 147 are  
17 based upon statements in public documents or records or deposition testimony, such  
18 statements speak for themselves and require no response. To the extent that the  
19 remaining allegations in Paragraph 147 are directed to other defendants or third parties,  
20 HannStar lacks knowledge or information sufficient to form a belief as to the truth of  
21 the allegations and, therefore, they are denied. To the extent that the remaining  
22 allegations contained in Paragraph 147 are directed to HannStar, they are denied.

23          148.     To the extent that the allegations contained in Paragraph 148 are  
24 based upon statements in public documents or records or deposition testimony, such  
25 statements speak for themselves and require no response. To the extent that the  
26 remaining allegations in Paragraph 148 are directed to other defendants or third parties,  
27 HannStar lacks knowledge or information sufficient to form a belief as to the truth of  
28

1 the allegations and, therefore, they are denied. To the extent that the remaining  
2 allegations contained in Paragraph 148 are directed to HannStar, they are denied.

3 149. To the extent that the allegations contained in Paragraph 149 are  
4 directed to other defendants or third parties, HannStar lacks knowledge or information  
5 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
6 denied. To the extent that the allegations contained in Paragraph 149 are directed to  
7 HannStar, they are denied.

8 150. To the extent that the allegations contained in Paragraph 150 are  
9 directed to other defendants or third parties, HannStar lacks knowledge or information  
10 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
11 denied. To the extent that the allegations contained in Paragraph 150 are directed to  
12 HannStar, they are denied.

13 151. To the extent that the allegations contained in Paragraph 151 are  
14 directed to other defendants or third parties, HannStar lacks knowledge or information  
15 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
16 denied. To the extent that the allegations contained in Paragraph 151 are directed to  
17 HannStar, they are denied.

18 152. To the extent that the allegations contained in Paragraph 152 are  
19 directed to other defendants or third parties, HannStar lacks knowledge or information  
20 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
21 denied. To the extent that the allegations contained in Paragraph 152 are directed to  
22 HannStar, they are denied.

23 153. To the extent that the allegations contained in Paragraph 153 are  
24 directed to other defendants or third parties, HannStar lacks knowledge or information  
25 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
26 denied. To the extent that the allegations contained in Paragraph 153 are directed to  
27 HannStar, they are denied.

28

1           154.     To the extent that the allegations contained in Paragraph 154 are  
2 directed to other defendants or third parties, HannStar lacks knowledge or information  
3 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
4 denied. To the extent that the allegations contained in Paragraph 154 are directed to  
5 HannStar, they are denied.

6           155.     To the extent that the allegations contained in Paragraph 155 are  
7 directed to other defendants or third parties, HannStar lacks knowledge or information  
8 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
9 denied. To the extent that the allegations contained in Paragraph 155 are directed to  
10 HannStar, they are denied.

11          156.     To the extent that the allegations contained in Paragraph 156 are  
12 directed to other defendants or third parties, HannStar lacks knowledge or information  
13 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
14 denied. To the extent that the allegations contained in Paragraph 156 are directed to  
15 HannStar, they are denied.

16          157.     To the extent that the allegations contained in Paragraph 157 are  
17 directed to other defendants or third parties, HannStar lacks knowledge or information  
18 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
19 denied. To the extent that the allegations contained in Paragraph 157 are directed to  
20 HannStar, they are denied.

21          158.     To the extent that the allegations contained in Paragraph 158 are  
22 directed to other defendants or third parties, HannStar lacks knowledge or information  
23 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
24 denied. To the extent that the allegations contained in Paragraph 158 are directed to  
25 HannStar, they are denied.

26          159.     To the extent that the allegations contained in Paragraph 159 are  
27 directed to other defendants or third parties, HannStar lacks knowledge or information  
28 sufficient to form a belief as to the truth of the allegations and, therefore, they are

1 denied. To the extent that the allegations contained in Paragraph 159 are directed to  
2 HannStar, they are denied.

3 160. To the extent that the allegations contained in Paragraph 160 are  
4 directed to other defendants or third parties, HannStar lacks knowledge or information  
5 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
6 denied. To the extent that the allegations contained in Paragraph 160 are directed to  
7 HannStar, they are denied.

8 161. To the extent that the allegations contained in Paragraph 161 are  
9 directed to other defendants or third parties, HannStar lacks knowledge or information  
10 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
11 denied. To the extent that the allegations contained in Paragraph 161 are directed to  
12 HannStar, they are denied.

13 162. To the extent that the allegations contained in Paragraph 162 are  
14 based upon statements in public documents or records or deposition testimony, such  
15 statements speak for themselves and require no response. To the extent that the  
16 remaining allegations in Paragraph 162 are directed to other defendants or third parties,  
17 HannStar lacks knowledge or information sufficient to form a belief as to the truth of  
18 the allegations and, therefore, they are denied. To the extent that the remaining  
19 allegations contained in Paragraph 162 are directed to HannStar, they are denied.

20 163. To the extent that the allegations contained in Paragraph 163 are  
21 based upon statements made in plea hearings, the transcripts of such hearings speak for  
22 themselves and require no response. To the extent that the remaining allegations in  
23 Paragraph 163 are directed to other defendants or third parties, HannStar lacks  
24 knowledge or information sufficient to form a belief as to the truth of the allegations  
25 and, therefore, they are denied. To the extent that the remaining allegations contained  
26 in Paragraph 163 are directed to HannStar, they are denied.

27 164. To the extent that the allegations contained in Paragraph 164 are  
28 directed to other defendants or third parties, HannStar lacks knowledge or information

1 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
2 denied. To the extent that the allegations contained in Paragraph 164 are directed to  
3 HannStar, they are denied.

4 165. To the extent that the allegations contained in Paragraph 165 are  
5 directed to other defendants or third parties, HannStar lacks knowledge or information  
6 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
7 denied. To the extent that the allegations contained in Paragraph 165 are directed to  
8 HannStar, they are denied.

9 166. To the extent that the allegations contained in Paragraph 166 are  
10 directed to other defendants or third parties, HannStar lacks knowledge or information  
11 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
12 denied. To the extent that the allegations contained in Paragraph 166 are directed to  
13 HannStar, they are denied.

14 167. To the extent that the allegations contained in Paragraph 167 are  
15 directed to other defendants or third parties, HannStar lacks knowledge or information  
16 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
17 denied. To the extent that the allegations contained in Paragraph 167 are directed to  
18 HannStar, they are denied.

19 168. To the extent that the allegations contained in Paragraph 168 are  
20 directed to other defendants or third parties, HannStar lacks knowledge or information  
21 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
22 denied. To the extent that the allegations contained in Paragraph 168 are directed to  
23 HannStar, they are denied.

24 169. To the extent that the allegations contained in Paragraph 169 are  
25 directed to other defendants or third parties, HannStar lacks knowledge or information  
26 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
27 denied. To the extent that the allegations contained in Paragraph 169 are directed to  
28 HannStar, they are denied.

1           170.     To the extent that the allegations contained in Paragraph 170 are  
2 directed to other defendants or third parties, HannStar lacks knowledge or information  
3 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
4 denied. To the extent that the allegations contained in Paragraph 170 are directed to  
5 HannStar, they are denied.

6           171.     To the extent that the allegations contained in Paragraph 171 are  
7 directed to other defendants or third parties, HannStar lacks knowledge or information  
8 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
9 denied. To the extent that the allegations contained in Paragraph 171 are directed to  
10 HannStar, they are denied.

11          172.     To the extent that the allegations contained in Paragraph 172 are  
12 directed to other defendants or third parties, HannStar lacks knowledge or information  
13 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
14 denied. To the extent that the allegations contained in Paragraph 172 are directed to  
15 HannStar, they are denied.

16          173.     To the extent that the allegations contained in Paragraph 173 are  
17 directed to other defendants or third parties, HannStar lacks knowledge or information  
18 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
19 denied. To the extent that the allegations contained in Paragraph 173 are directed to  
20 HannStar, they are denied.

21          174.     To the extent that the allegations contained in Paragraph 174 are  
22 based on statements issued by the respective government authorities, those statements  
23 speak for themselves and no response is required. To the extent that the allegations  
24 contained in Paragraph 174 are based on a December 11, 2006, statement filed by  
25 another defendant with the Securities and Exchange Commission (“SEC”), that  
26 statement speaks for itself and no response is required. To the extent that a response to  
27 the allegations of Paragraph 174 is deemed required, HannStar lacks knowledge or  
28 information sufficient to form a belief as to their truth and, therefore, denies them.

1           175.     To the extent the allegations contained in Paragraph 175 are based on  
2 news reports or public statements, those news reports and statements speak for  
3 themselves and therefore no response is required. To the extent that a response to the  
4 allegations of Paragraph 175 is deemed required, HannStar lacks knowledge or  
5 information sufficient to form a belief as to their truth and, therefore, denies them.

6           176.     To the extent that the allegations in Paragraph 176 are based on plea  
7 agreements, those agreements speak for themselves and no response is required. To  
8 the extent that the remaining allegations contained in Paragraph 176 are directed to  
9 other defendants, HannStar lacks knowledge or information sufficient to form a belief  
10 as to the truth of the allegations and, therefore, they are denied. To the extent that the  
11 allegations contained in Paragraph 176 are directed to HannStar, they are denied.

12          177.     The allegations in Paragraph 177 purport to characterize public  
13 statements or documents, the contents of which speak for themselves and require no  
14 further response. To the extent a further response to the allegations in Paragraph 177 is  
15 required, HannStar lacks knowledge or information sufficient to form a belief as to the  
16 truth of those allegations and, therefore, those allegations are denied.

17          178.     The allegations in Paragraph 178 purport to characterize public  
18 statements or documents, the contents of which speak for themselves and require no  
19 further response. To the extent a further response to the allegations in Paragraph 178 is  
20 required, HannStar lacks knowledge or information sufficient to form a belief as to the  
21 truth of those allegations and, therefore, those allegations are denied.

22          179.     The allegations in Paragraph 179 purport to characterize public  
23 statements or documents, the contents of which speak for themselves and require no  
24 further response. To the extent a further response to the allegations in Paragraph 179 is  
25 required, HannStar lacks knowledge or information sufficient to form a belief as to the  
26 truth of those allegations and, therefore, those allegations are denied.

27          180.     The allegations in Paragraph 180 purport to characterize public  
28 statements or documents, the contents of which speak for themselves and require no



1 further response. To the extent a further response to the allegations in Paragraph 180 is  
2 required, HannStar lacks knowledge or information sufficient to form a belief as to the  
3 truth of those allegations and, therefore, those allegations are denied.

4 181. The allegations in Paragraph 181 purport to characterize public  
5 statements or documents, the contents of which speak for themselves and require no  
6 further response. To the extent a further response to the allegations in Paragraph 181 is  
7 required, HannStar lacks knowledge or information sufficient to form a belief as to the  
8 truth of those allegations and, therefore, those allegations are denied.

9 182. The allegations in Paragraph 182 purport to characterize public  
10 statements and public documents, the contents of which speak for themselves and  
11 require no further response. To the extent a further response is required, HannStar  
12 lacks knowledge or information sufficient to form a belief as to the truth of the  
13 allegations and, therefore, they are denied.

14 183. The allegations in Paragraph 183 purport to characterize public  
15 statements and public documents, the contents of which speak for themselves and  
16 require no further response. To the extent a further response is required, HannStar  
17 lacks knowledge or information sufficient to form a belief as to the truth of the  
18 allegations and, therefore, they are denied.

19 184. The allegations in Paragraph 184 purport to characterize public  
20 documents, the contents of which speak for themselves and require no further  
21 response. To the extent a further response is required, HannStar lacks knowledge or  
22 information sufficient to form a belief as to the truth of the allegations and, therefore,  
23 they are denied.

24 185. The allegations in Paragraph 185 purport to characterize public  
25 statements and public documents, the contents of which speak for themselves and  
26 require no further response. To the extent a further response is required, HannStar  
27 lacks knowledge or information sufficient to form a belief as to the truth of the  
28 allegations and, therefore, they are denied.

1           186.     The allegations in Paragraph 186 purport to characterize public  
2 statements and public documents, the contents of which speak for themselves and  
3 require no further response. To the extent a further response is required, HannStar  
4 lacks knowledge or information sufficient to form a belief as to the truth of the  
5 allegations and, therefore, they are denied.

6           187.     The allegations in Paragraph 187 purport to characterize public  
7 statements and public documents, the contents of which speak for themselves and  
8 require no further response. To the extent a further response is required, HannStar  
9 lacks knowledge or information sufficient to form a belief as to the truth of the  
10 allegations and, therefore, they are denied.

11          188.     To the extent that the allegations contained in Paragraph 188 are  
12 directed to other defendants or third parties, HannStar lacks knowledge or information  
13 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
14 denied. To the extent that the allegations contained in Paragraph 188 are directed to  
15 HannStar, they are denied.

16          189.     To the extent that the allegations contained in Paragraph 189 are  
17 directed to other defendants or third parties, HannStar lacks knowledge or information  
18 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
19 denied. To the extent that the allegations contained in Paragraph 189 are directed to  
20 HannStar, they are denied.

21          190.     To the extent that the allegations contained in Paragraph 190 are  
22 directed to other defendants or third parties, HannStar lacks knowledge or information  
23 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
24 denied. To the extent that the allegations contained in Paragraph 190 are directed to  
25 HannStar, they are denied.

26          191.     With respect to Paragraph 191, HannStar denies that there is a single  
27 LCD Panel “market.” To the extent that the allegations contained in Paragraph 191 are  
28 directed to other defendants, HannStar lacks knowledge or information sufficient to

1 form a belief as to their truth and, therefore, denies those allegations. To the extent that  
2 the allegations in Paragraph 191 are directed at HannStar, they are denied.

3 192. With respect to Paragraph 192, HannStar denies that there is a single  
4 LCD Panel “market.” HannStar denies the remaining allegations contained in  
5 Paragraph 192.

6 193. With respect to Paragraph 193, HannStar denies that there is a single  
7 LCD Panel “market.” HannStar denies the remaining allegations contained in  
8 Paragraph 193.

9 194. To the extent that the allegations contained in Paragraph 194 are  
10 based on a reported forecast, that report speaks for itself and no response is required.  
11 HannStar lacks knowledge or information sufficient to form a belief as to the  
12 remaining allegations contained in Paragraph 194 and, therefore, those allegations are  
13 denied.

14 195. To the extent that the allegations contained in Paragraph 195 are  
15 directed to other defendants, HannStar lacks knowledge or information sufficient to  
16 form a belief as to the truth of the allegations and, therefore, they are denied. To the  
17 extent that the allegations contained in Paragraph 195 are directed to HannStar, they  
18 are denied.

19 196. With respect to Paragraph 196, HannStar denies that there is a single  
20 LCD Panel “market.” To the extent that the allegations in the first sentence of  
21 Paragraph 196 are based upon comments from analysts, those comments speak for  
22 themselves and no response is required. HannStar lacks knowledge or information  
23 sufficient to form a belief as to the truth of the allegations in the first three sentences of  
24 Paragraph 196 and, therefore, denies those allegations. To the extent that the  
25 allegations in the fourth sentence of Paragraph 196 are directed to other defendants,  
26 HannStar lacks knowledge or information sufficient to form a belief as to their truth  
27 and, therefore, denies those allegations. To the extent that those allegations are directed  
28 at HannStar, they are denied.

1           197.     To the extent that the allegations in Paragraph 197 are derived from a  
2 publication, such publication speaks for itself and no response is required. To the  
3 extent a response is deemed required, HannStar lacks knowledge or information  
4 sufficient to form a belief as to the truth of the remaining allegations in Paragraph 197  
5 and, therefore, denies those allegations.

6           198.     To the extent that the allegations contained in Paragraph 198 are  
7 based upon publications or reports, those documents speak for themselves and no  
8 response is required. To the extent that a response is deemed required, HannStar lacks  
9 knowledge or information sufficient to form a belief as to the truth of the allegations  
10 contained in Paragraph 198 and, therefore, denies those allegations.

11          199.     To the extent that the allegations contained in Paragraph 199 are  
12 directed to other defendants or third parties, HannStar lacks knowledge or information  
13 sufficient to form a belief as to their truth and, therefore, denies those allegations. To  
14 the extent that the allegations in Paragraph 199 are directed at HannStar, they are  
15 denied.

16          200.     To the extent that the allegations contained in the first and last  
17 sentences of Paragraph 200 are directed to other defendants or third parties, HannStar  
18 lacks knowledge or information sufficient to form a belief as to their truth and,  
19 therefore, denies those allegations. To the extent that the allegations contained in the  
20 first and last sentences of Paragraph 200 are directed at HannStar, they are denied.  
21 HannStar lacks knowledge or information sufficient to form a belief as to the truth of  
22 the allegations contained in the second and fourth sentences of Paragraph 200.  
23 HannStar admits that the allegations contained in the third sentence of Paragraph 200  
24 describe in a general manner some of the components of certain liquid crystal displays,  
25 but denies that this description is comprehensive or entirely accurate, and denies the  
26 allegations on that basis.

27          201.     HannStar lacks knowledge or information sufficient to form a belief  
28 as to the truth of the allegations contained in the first two sentences of Paragraph 201.

1 To the extent that the allegations contained in the third sentence of Paragraph 201 are  
2 directed to other defendants, HannStar lacks knowledge or information sufficient to  
3 form a belief as to the truth of those allegations and, therefore, they are denied.

4 202. HannStar lacks knowledge or information sufficient to form a belief  
5 as to the truth of the allegations contained in Paragraph 202 and, therefore, denies the  
6 allegations.

7 203. To the extent that the allegations contained in Paragraph 203 are  
8 based on public statements or documents, those statements and documents speak for  
9 themselves, and no response is required. To the extent a response is required, and in  
10 response to the remaining allegations contained in Paragraph 203, HannStar responds  
11 as follows: To the extent that the allegations contained in Paragraph 203 are directed  
12 to other defendants, HannStar lacks knowledge or information sufficient to form a  
13 belief as to their truth and, therefore, denies those allegations. To the extent that the  
14 allegations in Paragraph 203 are directed at HannStar, they are denied.

15 204. To the extent that the allegations in Paragraph 204 are directed to  
16 other defendants, HannStar lacks knowledge or information sufficient to form a belief  
17 as to their truth and, therefore, denies those allegations. To the extent that the  
18 allegations in Paragraph 204 are directed at HannStar, HannStar lacks knowledge or  
19 information sufficient to form a belief as to the truth of those allegations and, therefore,  
20 they are denied.

21 205. HannStar lacks knowledge or information sufficient to form a belief  
22 as to the truth of the allegations in Paragraph 205 and, therefore, denies those  
23 allegations.

24 206. HannStar lacks knowledge or information sufficient to form a belief  
25 as to the truth of the allegations in Paragraph 206 and, therefore, denies those  
26 allegations.

27 207. To the extent that the allegations in Paragraph 207 are directed to  
28 other defendants, HannStar lacks knowledge or information sufficient to form a belief

1 as to their truth and, therefore, denies those allegations. To the extent that the  
2 allegations in Paragraph 207 are directed at HannStar, they are denied.

3 208. To the extent that the allegations in Paragraph 208 are directed to  
4 other defendants, HannStar lacks knowledge or information sufficient to form a belief  
5 as to their truth and, therefore, denies those allegations. To the extent that the  
6 allegations in Paragraph 208 are directed at HannStar, they are denied.

7 209. To the extent that the allegations in Paragraph 209 are directed to  
8 other defendants, HannStar lacks knowledge or information sufficient to form a belief  
9 as to their truth and, therefore, denies those allegations. To the extent that the  
10 allegations in Paragraph 209 are directed at HannStar, they are denied.

11 210. The allegations in Paragraph 210 purport to quote from statements  
12 made in a deposition the transcript of which speaks for itself, and require no further  
13 response.

14 211. To the extent that the allegations in Paragraph 211 are directed to  
15 other defendants, HannStar lacks knowledge or information sufficient to form a belief  
16 as to their truth and, therefore, denies those allegations. To the extent that the  
17 allegations in Paragraph 211 are directed at HannStar, they are denied.

18 212. To the extent that the allegations in Paragraph 212 are directed to  
19 other defendants, HannStar lacks knowledge or information sufficient to form a belief  
20 as to their truth and, therefore, denies those allegations. To the extent that the  
21 allegations in Paragraph 212 are directed at HannStar, they are denied.

22 213. To the extent that the allegations in Paragraph 213 are directed to  
23 other defendants, HannStar lacks knowledge or information sufficient to form a belief  
24 as to their truth and, therefore, denies those allegations. To the extent that the  
25 allegations in Paragraph 213 are directed at HannStar, they are denied.

26 214. To the extent that the allegations in Paragraph 214 are directed to  
27 other defendants, HannStar lacks knowledge or information sufficient to form a belief

28

1 as to their truth and, therefore, denies those allegations. To the extent that the  
2 allegations in Paragraph 214 are directed at HannStar, they are denied.

3 215. To the extent that the allegations in Paragraph 215 are directed to  
4 other defendants, HannStar lacks knowledge or information sufficient to form a belief  
5 as to their truth and, therefore, denies those allegations. To the extent that the  
6 allegations in Paragraph 215 are directed at HannStar, they are denied.

7 216. To the extent that the allegations in Paragraph 216 are directed to  
8 other defendants, HannStar lacks knowledge or information sufficient to form a belief  
9 as to their truth and, therefore, denies those allegations. To the extent that the  
10 allegations in Paragraph 216 are directed at HannStar, they are denied.

11 217. To the extent that the allegations in Paragraph 217 are directed to  
12 other defendants, HannStar lacks knowledge or information sufficient to form a belief  
13 as to their truth and, therefore, denies those allegations. To the extent that the  
14 allegations in Paragraph 217 are directed at HannStar, they are denied.

15 218. To the extent that the allegations in Paragraph 218 are directed to  
16 other defendants, HannStar lacks knowledge or information sufficient to form a belief  
17 as to their truth and, therefore, denies those allegations. To the extent that the  
18 allegations in Paragraph 218 are directed at HannStar, they are denied.

19 219. To the extent that the allegations in Paragraph 219 are directed to  
20 other defendants, HannStar lacks knowledge or information sufficient to form a belief  
21 as to their truth and, therefore, denies those allegations. To the extent that the  
22 allegations in Paragraph 219 are directed at HannStar, they are denied.

23 220. To the extent that the allegations in Paragraph 220 are directed to  
24 other defendants, HannStar lacks knowledge or information sufficient to form a belief  
25 as to their truth and, therefore, denies those allegations. To the extent that the  
26 allegations in Paragraph 220 are directed at HannStar, they are denied.

27 221. To the extent that the allegations in Paragraph 221 are directed to  
28 other defendants, HannStar lacks knowledge or information sufficient to form a belief

1 as to their truth and, therefore, denies those allegations. To the extent that the  
2 allegations in Paragraph 221 are directed at HannStar, they are denied.

3 222. To the extent that the allegations in Paragraph 222 are directed to  
4 other defendants, HannStar lacks knowledge or information sufficient to form a belief  
5 as to their truth and, therefore, denies those allegations. To the extent that the  
6 allegations in Paragraph 222 are directed at HannStar, they are denied.

7 223. HannStar lacks knowledge or information sufficient to form a belief  
8 as to the truth of the allegations in Paragraph 223 and, therefore, denies those  
9 allegations.

10 224. HannStar lacks knowledge or information sufficient to form a belief  
11 as to the truth of the allegations in Paragraph 224 and, therefore, denies those  
12 allegations.

13 225. HannStar lacks knowledge or information sufficient to form a belief  
14 as to the truth of the allegations in the first three sentences of Paragraph 225 and,  
15 therefore, denies those allegations. With respect to the remaining allegations in  
16 Paragraph 225, HannStar states as follows: To the extent that the remaining allegations  
17 in Paragraph 225 are directed to other defendants, HannStar lacks knowledge or  
18 information sufficient to form a belief as to their truth and, therefore, denies those  
19 allegations. To the extent that the remaining allegations in Paragraph 225 are directed  
20 at HannStar, they are denied.

21 226. HannStar lacks knowledge or information sufficient to form a belief  
22 as to the truth of the allegations in Paragraph 226 and, therefore, denies those  
23 allegations.

24 227. To the extent that the allegations in Paragraph 227 are directed to  
25 other defendants, HannStar lacks knowledge or information sufficient to form a belief  
26 as to their truth and, therefore, denies those allegations. To the extent that the  
27 allegations in Paragraph 227 are directed at HannStar, they are denied.

28



1           228.     To the extent that the allegations in Paragraph 228 describe actions  
2 taken by certain purchasers or are directed to other defendants, HannStar lacks  
3 knowledge or information sufficient to form a belief as to their truth and, therefore,  
4 denies those allegations. To the extent that the allegations in Paragraph 228 are  
5 directed at HannStar, they are denied.

6           229.     To the extent that the allegations in Paragraph 229 are based on public  
7 statements or documents, those statements or documents speak for themselves and no  
8 response is required. With respect to the remaining allegations in Paragraph 229,  
9 HannStar states as follows: To the extent that the remaining allegations in Paragraph  
10 229 are directed to other defendants, HannStar lacks knowledge or information  
11 sufficient to form a belief as to their truth and, therefore, denies those allegations. To  
12 the extent that the remaining allegations in Paragraph 229 are directed at HannStar,  
13 they are denied.

14          230.     To the extent that the allegations in Paragraph 230 are directed to  
15 other defendants, HannStar lacks knowledge or information sufficient to form a belief  
16 as to their truth and, therefore, denies those allegations. To the extent that the  
17 allegations in Paragraph 230 are directed at HannStar, they are denied.

18          231.     HannStar denies there is a single “LCD Industry.” HannStar admits  
19 that certain TFT-LCD trade organizations convene meetings. To the extent that the  
20 remaining allegations contained in Paragraph 231 are directed to other defendants,  
21 HannStar lacks knowledge or information sufficient to form a belief as to their truth  
22 and, therefore, denies those allegations. To the extent that the remaining allegations in  
23 Paragraph 231 are directed at HannStar, they are denied.

24          232.     To the extent that the allegations contained in Paragraph 232 are  
25 based on statements, those statements speak for themselves and no response is  
26 required. To the extent that the remaining allegations contained in Paragraph 232 are  
27 directed to other defendants, HannStar lacks knowledge or information sufficient to  
28 form a belief as to their truth and, therefore, denies those allegations. To the extent that

1 the remaining allegations in Paragraph 232 are directed at HannStar, HannStar admits  
2 that it has been a member of the Taiwan TFT-LCD Association, and otherwise denies  
3 the allegations.

4 233. To the extent that the allegations contained in Paragraph 233 are  
5 based on statements, those statements speak for themselves and no response is  
6 required. HannStar lacks knowledge or information sufficient to form a belief as to the  
7 truth of the remaining allegations in Paragraph 233 and, therefore, denies those  
8 allegations.

9 234. HannStar lacks knowledge or information sufficient to form a belief  
10 as to the truth of the allegations in Paragraph 234 and, therefore, denies those  
11 allegations.

12 235. HannStar lacks knowledge or information sufficient to form a belief  
13 as to the truth of the allegations contained in Paragraph 235 and, therefore, those  
14 allegations are denied.

15 236. With respect to Paragraph 236, HannStar denies that there is a single  
16 LCD “market.” HannStar lacks knowledge or information sufficient to form a belief as  
17 to the truth of the allegations contained in Paragraph 236 and, therefore, those  
18 allegations are denied.

19 237. To the extent that the allegations contained in Paragraph 237 are  
20 based on statements, those statements speak for themselves and no response is  
21 required. HannStar lacks knowledge or information sufficient to form a belief as to the  
22 truth of the remaining allegations contained in Paragraph 237 and, therefore, those  
23 allegations are denied.

24 238. To the extent that the allegations contained in Paragraph 238 are  
25 based on statements, those statements speak for themselves and no response is  
26 required. To the extent that the remaining allegations contained in Paragraph 238 are  
27 directed to other defendants or third parties, HannStar lacks knowledge or information  
28 sufficient to form a belief as to the truth of those allegations and, therefore, they are

1 denied. To the extent that the remaining allegations contained in Paragraph 238 are  
2 directed to HannStar, HannStar denies the allegations.

3 239. HannStar lacks knowledge or information sufficient to form a belief  
4 as to the truth of the allegations contained in Paragraph 239 and, therefore, those  
5 allegations are denied.

6 240. To the extent that the allegations contained in Paragraph 240 are  
7 directed to other defendants, HannStar lacks knowledge or information sufficient to  
8 form a belief as to their truth and, therefore, denies those allegations. To the extent that  
9 the remaining allegations in Paragraph 240 are directed at HannStar, they are denied.

10 241. HannStar lacks knowledge or information sufficient to form a belief  
11 as to the truth of the allegations contained in Paragraph 241 and, therefore, those  
12 allegations are denied.

13 242. To the extent that the allegations contained in Paragraph 242 are  
14 based on statements or publications, those statements and publications speak for  
15 themselves and no response is required. To the extent that the allegations contained in  
16 Paragraph 242 are directed to other defendants, HannStar lacks knowledge or  
17 information sufficient to form a belief as to their truth and, therefore, denies those  
18 allegations. To the extent that the remaining allegations in Paragraph 242 are directed  
19 at HannStar, they are denied.

20 243. HannStar lacks knowledge or information sufficient to form a belief  
21 as to the truth of the allegations contained in Paragraph 243 and, therefore, those  
22 allegations are denied.

23 244. To the extent that the allegations contained in Paragraph 244 are  
24 based on public pronouncements, those pronouncements speak for themselves and no  
25 response is required. To the extent that the allegations contained in Paragraph 244 are  
26 directed to other defendants, HannStar lacks knowledge or information sufficient to  
27 form a belief as to their truth and, therefore, denies those allegations. To the extent that  
28 the remaining allegations in Paragraph 244 are directed at HannStar, they are denied.

1           245.     Paragraph 245 consists of legal conclusions, to which no response is  
2 required. To the extent a response is deemed required, HannStar responds as follows:  
3 To the extent that the allegations contained in Paragraph 245 are directed to other  
4 defendants or third parties, HannStar lacks knowledge or information sufficient to form  
5 a belief as to the truth of the allegations and, therefore, they are denied. To the extent  
6 that the allegations contained in Paragraph 245 are directed to HannStar, they are  
7 denied.

8           246.     With respect to Paragraph 246, HannStar denies that there is a single  
9 “U.S. LCD market.” To the extent that the allegations contained in Paragraph 246 are  
10 directed to other defendants, HannStar lacks knowledge or information sufficient to  
11 form a belief as to their truth and, therefore, denies those allegations. To the extent that  
12 the remaining allegations in Paragraph 246 are directed at HannStar, they are denied.

13          247.     Paragraph 247 consists of legal conclusions, to which no response is  
14 required. To the extent a response is deemed required, HannStar responds as follows:  
15 To the extent that the allegations contained in Paragraph 247 are directed to other  
16 defendants or third parties, HannStar lacks knowledge or information sufficient to form  
17 a belief as to the truth of the allegations and, therefore, they are denied. To the extent  
18 that the allegations contained in Paragraph 247 are directed to HannStar, they are  
19 denied.

20          248.     To the extent that the allegations contained in Paragraph 248 are  
21 directed to other defendants or third parties, HannStar lacks knowledge or information  
22 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
23 denied. To the extent that the allegations contained in Paragraph 248 are directed to  
24 HannStar, they are denied.

25          249.     To the extent that the allegations contained in Paragraph 249 are  
26 directed to other defendants or third parties, HannStar lacks knowledge or information  
27 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
28

1 denied. To the extent that the allegations contained in Paragraph 249 are directed to  
2 HannStar, they are denied.

3         250.       The allegations in Paragraph 250 purport to characterize filings made  
4 with the International Trade Commission which speak for themselves and therefore  
5 require no response. To the extent a response is deemed required, HannStar states as  
6 follows: To the extent that the allegations contained in Paragraph 250 are directed to  
7 other defendants, HannStar lacks knowledge or information sufficient to form a belief  
8 as to the truth of the allegations and, therefore, they are denied. To the extent that the  
9 allegations contained in Paragraph 250 are directed to HannStar, they are denied.

10        251.       The allegations contained in Paragraph 251 purport to characterize  
11 public statements and public documents, the contents of which speak for themselves  
12 and require no further response. To the extent a further response is required, HannStar  
13 responds as follows: To the extent that the allegations contained in Paragraph 251 are  
14 directed to other defendants or third parties, HannStar lacks knowledge or information  
15 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
16 denied. To the extent that the allegations are directed to HannStar, HannStar refers to  
17 the HannStar Plea Agreement and the statements contained therein and otherwise  
18 denies the allegations.

19         252.       Paragraph 252 consists of legal conclusions to which no response is  
20 required. To the extent a response is deemed required, HannStar denies the allegations  
21 in Paragraph 252.

22         253.       Paragraph 253 consists of plaintiff's characterization of its claims and  
23 legal conclusions, to which no response is required. To the extent a response is  
24 deemed required, HannStar responds as follows: To the extent that the allegations  
25 contained in Paragraph 253 are directed to other defendants or third parties, HannStar  
26 lacks knowledge or information sufficient to form a belief as to the truth of the  
27 allegations and, therefore, they are denied. To the extent that the allegations contained  
28 in Paragraph 253 are directed to HannStar, they are denied.

1           254.     To the extent that the allegations contained in Paragraph 254 are  
2 directed to other defendants or third parties, HannStar lacks knowledge or information  
3 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
4 denied. To the extent that the allegations contained in Paragraph 254 are directed to  
5 HannStar, they are denied.

6           255.     HannStar lacks knowledge or information sufficient to form a belief  
7 as to the truth of the allegations in Paragraph 255 and, therefore, they are denied.

8           256.     To the extent that the allegations contained in Paragraph 256 are  
9 directed to other defendants or third parties, HannStar lacks knowledge or information  
10 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
11 denied. To the extent that the allegations contained in Paragraph 256 are directed to  
12 HannStar, they are denied.

13          257.     To the extent that the allegations contained in Paragraph 257 are  
14 directed to other defendants or third parties, HannStar lacks knowledge or information  
15 sufficient to form a belief as to the truth of the allegations and, therefore, they are  
16 denied. To the extent that the allegations contained in Paragraph 257 are directed to  
17 HannStar, they are denied.

18          258.     Paragraph 258 consists of legal conclusions, to which no response is  
19 required. To the extent a response is deemed required, HannStar responds as follows:  
20 To the extent that the allegations contained in Paragraph 258 are directed to other  
21 defendants or third parties, HannStar lacks knowledge or information sufficient to form  
22 a belief as to the truth of the allegations and, therefore, they are denied. To the extent  
23 that the allegations contained in Paragraph 258 are directed to HannStar, they are  
24 denied.

25          259.     Paragraph 259 consists of legal conclusions, to which no response is  
26 required. To the extent a response is deemed required, HannStar responds as follows:  
27 To the extent that the allegations contained in Paragraph 259 are directed to other  
28 defendants or third parties, HannStar lacks knowledge or information sufficient to form

1 a belief as to the truth of the allegations and, therefore, they are denied. To the extent  
2 that the allegations contained in Paragraph 259 are directed to HannStar, they are  
3 denied.

4 260. Paragraph 260 consists of plaintiffs' characterizations of their claims  
5 or legal conclusions to which no response is required. To the extent a response may be  
6 deemed required, HannStar responds as follows: To the extent that the allegations  
7 contained in Paragraph 260 are directed to other defendants or third parties, HannStar  
8 lacks knowledge or information sufficient to form a belief as to their truth and,  
9 therefore, denies those allegations. To the extent that the allegations in Paragraph 260  
10 are directed at HannStar, they are denied.

11 261. To the extent that the allegations contained in Paragraph 261 are  
12 directed to other defendants or third parties, HannStar lacks knowledge or information  
13 sufficient to form a belief as to their truth and, therefore, denies those allegations. To  
14 the extent that the remaining allegations in Paragraph 261 are directed at HannStar,  
15 they are denied.

16 262. Paragraph 262 consists of plaintiffs' characterizations of their claims  
17 or legal conclusions to which no response is required. To the extent a response may be  
18 deemed required, HannStar responds as follows: To the extent that the allegations  
19 contained in Paragraph 262 are directed to other defendants or third parties, HannStar  
20 lacks knowledge or information sufficient to form a belief as to their truth and,  
21 therefore, denies those allegations. To the extent that the allegations in Paragraph 262  
22 are directed at HannStar, they are denied.

23 263. To the extent the allegations in Paragraph 263 are based on deposition  
24 testimony and/or documents produced in this litigation, such testimony and documents  
25 speak for themselves and no response is required. To the extent that a response to  
26 Paragraph 263 is deemed required, HannStar responds as follows: To the extent that  
27 the allegations contained in Paragraph 263 are directed to other defendants or third  
28 parties, HannStar lacks knowledge or information sufficient to form a belief as to their

1 truth and, therefore, denies those allegations. To the extent the allegations of  
2 Paragraph 263 are directed at HannStar, they are denied.

3 264. To the extent that the allegations contained in Paragraph 264 are  
4 directed to other defendants or third parties, HannStar lacks knowledge or information  
5 sufficient to form a belief as to their truth and, therefore, denies those allegations. To  
6 the extent that the allegations in Paragraph 264 are directed at HannStar, they are  
7 denied.

8 265. To the extent that the allegations contained in Paragraph 265 are  
9 directed to another defendant, HannStar lacks knowledge or information sufficient to  
10 form a belief as to their truth and, therefore, denies those allegations. To the extent  
11 that the allegations in Paragraph 265 are directed at HannStar, they are denied.

12 266. To the extent that the allegations contained in Paragraph 266 are  
13 directed to other defendants or third parties, HannStar lacks knowledge or information  
14 sufficient to form a belief as to their truth and, therefore, denies those allegations. To  
15 the extent that the allegations in Paragraph 266 are directed at HannStar, they are  
16 denied.

17 267. To the extent that the allegations contained in Paragraph 267 are  
18 directed to other defendants, HannStar lacks knowledge or information sufficient to  
19 form a belief as to their truth and, therefore, denies those allegations. To the extent  
20 that the allegations in Paragraph 267 are directed at HannStar, they are denied.

21 268. To the extent that the allegations contained in Paragraph 268 are  
22 based on public statements, those statements speak for themselves and no response is  
23 required. To the extent that a response is deemed required, HannStar lacks knowledge  
24 or information sufficient to form a belief as to the truth of the allegations in Paragraph  
25 268 and, therefore, denies them, except that HannStar generally admits that there may  
26 be a variety of market-based explanations for price increases.

27 269. To the extent that the allegations in Paragraph 269 are directed to  
28 other defendants or third parties, HannStar lacks knowledge or information sufficient



1 to form a belief as to the truth of those allegations and, therefore, denies them. To the  
2 extent that the allegations contained in Paragraph 269 are directed to HannStar, they  
3 are denied.

4 270. HannStar lacks knowledge or information sufficient to form a belief  
5 as to the truth of the allegations in Paragraph 270 and, therefore, denies them.

6 271. To the extent that the allegations in Paragraph 271 are directed to  
7 other defendants or third parties, HannStar lacks knowledge or information sufficient  
8 to form a belief as to the truth of those allegations and, therefore, denies them. To the  
9 extent that the allegations contained in Paragraph 271 are directed to HannStar, they  
10 are denied.

11 272. To the extent that the allegations in Paragraph 272 are based upon  
12 public statements, such statements speak for themselves and require no response. To  
13 the extent a response is deemed required, HannStar lacks knowledge or information  
14 sufficient to form a belief as to the truth of the allegations in Paragraph 272 and,  
15 therefore, denies them.

16 273. To the extent that the allegations in Paragraph 273 are directed to  
17 other defendants or third parties, HannStar lacks knowledge or information sufficient  
18 to form a belief as to the truth of those allegations and, therefore, denies them. To the  
19 extent that the allegations contained in Paragraph 273 are directed to HannStar, they  
20 are denied.

21 274. Paragraph 274 contains plaintiff's characterization of its claims and  
22 legal conclusion to which no response is required. To the extent a response is deemed  
23 required, HannStar states as follows: To the extent that the allegations in Paragraph  
24 274 are directed to other defendants or third parties, HannStar lacks knowledge or  
25 information sufficient to form a belief as to the truth of those allegations and, therefore,  
26 denies them. To the extent that the allegations contained in Paragraph 274 are directed  
27 to HannStar, they are denied.

28

1           275.     Paragraph 275 consists of legal conclusions to which no response is  
2 required. To the extent a response may be deemed required, HannStar denies the  
3 allegations.

4           276.     The allegations in Paragraph 276 consist of legal conclusions  
5 requiring no response, and purport to characterize public statements or documents, the  
6 contents of which speak for themselves and require no further response.

7           277.     Paragraph 277 consists of legal conclusions to which no response is  
8 required. To the extent a response may be deemed required, HannStar denies the  
9 allegations.

10          278.     Paragraph 278 consists of legal conclusions to which no response is  
11 required. To the extent a response may be deemed required, HannStar denies the  
12 allegations.

13          279.     The allegations in Paragraph 279 consist of legal conclusions  
14 requiring no response, and purport to characterize public statements or documents, the  
15 contents of which speak for themselves and require no further response.

16          280.     Paragraph 280 is a paragraph of incorporation. To the extent required,  
17 HannStar reincorporates and restates all of its responses set forth above to Paragraphs 1  
18 through 279 of the Complaint.

19          281.     Paragraph 281 consists of plaintiff's characterization of its claims or  
20 legal conclusions to which no response is required. To the extent a response may be  
21 deemed required, HannStar responds as follows: To the extent that the allegations  
22 contained in Paragraph 281 are directed to other defendants or third parties, HannStar  
23 lacks knowledge or information sufficient to form a belief as to their truth and,  
24 therefore, denies those allegations. To the extent that the allegations in Paragraph 281  
25 are directed at HannStar, they are denied.

26          282.     Paragraph 282 consists of plaintiff's characterization of its claims or  
27 legal conclusions to which no response is required. To the extent a response may be  
28 deemed required, HannStar responds as follows: To the extent that the allegations

1 contained in Paragraph 282 are directed to other defendants or third parties, HannStar  
2 lacks knowledge or information sufficient to form a belief as to their truth and,  
3 therefore, denies those allegations. To the extent that the allegations in Paragraph 282  
4 are directed at HannStar, they are denied.

5 283. Paragraph 283 consists of plaintiff's characterization of its claims or  
6 legal conclusions to which no response is required. To the extent a response may be  
7 deemed required, HannStar responds as follows: To the extent that the allegations  
8 contained in Paragraph 283 are directed to other defendants or third parties, HannStar  
9 lacks knowledge or information sufficient to form a belief as to their truth and,  
10 therefore, denies those allegations. To the extent that the allegations in Paragraph 283  
11 are directed at HannStar, they are denied.

12 284. Paragraph 284 consists of plaintiff's characterization of its claims or  
13 legal conclusions to which no response is required. To the extent a response may be  
14 deemed required, HannStar responds as follows: To the extent that the allegations  
15 contained in Paragraph 284 are directed to other defendants or third parties, HannStar  
16 lacks knowledge or information sufficient to form a belief as to their truth and,  
17 therefore, denies those allegations. To the extent that the allegations in Paragraph 284  
18 are directed at HannStar, they are denied.

19 285. Paragraph 285 consists of plaintiff's characterization of its claims or  
20 legal conclusions to which no response is required. To the extent a response may be  
21 deemed required, HannStar responds as follows: To the extent that the allegations  
22 contained in Paragraph 285 are directed to other defendants or third parties, HannStar  
23 lacks knowledge or information sufficient to form a belief as to their truth and,  
24 therefore, denies those allegations. To the extent that the allegations in Paragraph 285  
25 are directed at HannStar, they are denied.

26 286. Paragraph 286 consists of plaintiff's characterization of its claims or  
27 legal conclusions to which no response is required. To the extent a response may be  
28 deemed required, HannStar responds as follows: To the extent that the allegations

1 contained in Paragraph 286 are directed to other defendants or third parties, HannStar  
2 lacks knowledge or information sufficient to form a belief as to their truth and,  
3 therefore, denies those allegations. To the extent that the allegations in Paragraph 286  
4 are directed at HannStar, they are denied.

5 287. Paragraph 287 is a paragraph of incorporation. To the extent required,  
6 HannStar reincorporates and restates all of its responses set forth above to Paragraphs 1  
7 through 286 of the Complaint.

8 288. Paragraph 288 consists of plaintiff's characterization of its claims or  
9 legal conclusions to which no response is required. To the extent a response may be  
10 deemed required, HannStar responds as follows: To the extent that the allegations  
11 contained in Paragraph 288 are directed to other defendants, HannStar lacks  
12 knowledge or information sufficient to form a belief as to their truth and, therefore,  
13 denies those allegations. To the extent that the allegations in Paragraph 288 are  
14 directed at HannStar, they are denied.

15 289. HannStar lacks knowledge or information sufficient to form a belief  
16 as to the truth of the allegations in the first three sentences of Paragraph 289 and,  
17 therefore, denies those allegations. To the extent that the allegations contained in the  
18 last sentence of Paragraph 289 are directed to other defendants, HannStar lacks  
19 knowledge or information sufficient to form a belief as to their truth and, therefore,  
20 denies those allegations. To the extent that the allegations in the last sentence of  
21 Paragraph 289 are directed at HannStar, they are denied.

22 290. Paragraph 290 consists of legal conclusions requiring no response.

23 291. The allegations in the second sentence of Paragraph 291 purport to  
24 characterize public statements or documents, the contents of which speak for  
25 themselves and require no further response. To the extent a further response to the  
26 allegations in the second sentence of Paragraph 291 is required, and in response to the  
27 remaining allegations in Paragraph 291, Hannstar states as follows: To the extent that  
28 the allegations contained in Paragraph 291 are directed to other defendants or third

1 parties, HannStar lacks knowledge or information sufficient to form a belief as to their  
2 truth and, therefore, denies those allegations. To the extent that the allegations in  
3 Paragraph 291 are directed at HannStar, they are denied.

4 292. Paragraph 292 consists of plaintiff's characterization of its claims or  
5 legal conclusions to which no response is required. To the extent a response may be  
6 deemed required, HannStar responds as follows: To the extent that the allegations  
7 contained in Paragraph 292 are directed to other defendants or third parties, HannStar  
8 lacks knowledge or information sufficient to form a belief as to their truth and,  
9 therefore, denies those allegations. To the extent that the allegations in Paragraph 291  
10 are directed at HannStar, they are denied.

11 293. Paragraph 293 consists of plaintiff's characterization of its claims or  
12 legal conclusions to which no response is required. To the extent a response may be  
13 deemed required, HannStar responds as follows: To the extent that the allegations  
14 contained in Paragraph 293 are directed to other defendants or third parties, HannStar  
15 lacks knowledge or information sufficient to form a belief as to their truth and,  
16 therefore, denies those allegations. To the extent that the allegations in Paragraph 293  
17 are directed at HannStar, they are denied.

18 294. Paragraph 294 consists of plaintiff's characterization of its claims or  
19 legal conclusions to which no response is required. To the extent a response may be  
20 deemed required, HannStar responds as follows: To the extent that the allegations  
21 contained in Paragraph 294 are directed to other defendants or third parties, HannStar  
22 lacks knowledge or information sufficient to form a belief as to their truth and,  
23 therefore, denies those allegations. To the extent that the allegations in Paragraph 294  
24 are directed at HannStar, they are denied.

25 295. Paragraph 295 consists of plaintiff's characterization of its claims or  
26 legal conclusions to which no response is required. To the extent a response may be  
27 deemed required, HannStar responds as follows: To the extent that the allegations  
28 contained in Paragraph 295 are directed to other defendants or third parties, HannStar

1 lacks knowledge or information sufficient to form a belief as to their truth and,  
2 therefore, denies those allegations. To the extent that the allegations in Paragraph 295  
3 are directed at HannStar, they are denied.

4         296. Paragraph 296 consists of plaintiff's characterization of its claims or  
5 legal conclusions to which no response is required. To the extent a response may be  
6 deemed required, HannStar responds as follows: To the extent that the allegations  
7 contained in Paragraph 296 are directed to other defendants or third parties, HannStar  
8 lacks knowledge or information sufficient to form a belief as to their truth and,  
9 therefore, denies those allegations. To the extent that the allegations in Paragraph 296  
10 are directed at HannStar, they are denied.

11         297. Paragraph 297 consists of plaintiff's characterization of its claims or  
12 legal conclusions to which no response is required. To the extent a response may be  
13 deemed required, HannStar responds as follows: To the extent that the allegations  
14 contained in Paragraph 297 are directed to other defendants or third parties, HannStar  
15 lacks knowledge or information sufficient to form a belief as to their truth and,  
16 therefore, denies those allegations. To the extent that the allegations in Paragraph 297  
17 are directed at HannStar, they are denied.

18         298. Paragraph 298 consists of plaintiff's characterization of its claims or  
19 legal conclusions to which no response is required. To the extent a response may be  
20 deemed required, HannStar responds as follows: To the extent that the allegations  
21 contained in Paragraph 298 are directed to other defendants or third parties, HannStar  
22 lacks knowledge or information sufficient to form a belief as to their truth and,  
23 therefore, denies those allegations. To the extent that the allegations in Paragraph 298  
24 are directed at HannStar, they are denied.

25         299. Paragraph 299 consists of plaintiff's characterization of its claims or  
26 legal conclusions to which no response is required. To the extent a response may be  
27 deemed required, HannStar responds as follows: To the extent that the allegations  
28 contained in Paragraph 299 are directed to other defendants or third parties, HannStar

1 lacks knowledge or information sufficient to form a belief as to their truth and,  
2 therefore, denies those allegations. To the extent that the allegations in Paragraph 299  
3 are directed at HannStar, they are denied.

4 The remainder of plaintiff's Complaint consists of its Prayer for Relief, to  
5 which no response is required. To the extent a response is deemed required, HannStar  
6 denies the allegations in plaintiff's Prayer for Relief.

7 **ADDITIONAL DEFENSES/AFFIRMATIVE DEFENSES**

8 Without assuming any burden of proof it would not otherwise bear, HannStar  
9 asserts the following additional defenses and affirmative defenses, while reserving the  
10 right to amend this Answer and to add additional defenses as this case and/or  
11 discovery proceeds:

- 12 1. The Complaint fails to state a claim upon which relief can be granted.
- 13 2. The claims set forth in the Complaint are barred by the applicable  
14 statutes of limitation.
- 15 3. Plaintiff has failed to allege fraudulent concealment with the  
16 particularity required by Federal Rule of Civil Procedure 9(b).
- 17 4. The conduct alleged by plaintiff in the Complaint to form the basis of  
18 certain of plaintiff's claims has not had a direct, substantial, and reasonably foreseeable  
19 effect on trade or commerce within the United States. Therefore, this Court lacks  
20 subject matter jurisdiction and plaintiff's claims are barred, in whole or in part,  
21 pursuant to the Foreign Trade Antitrust Improvements Act, 15 U.S.C. § 6a.
- 22 5. The Court lacks personal jurisdiction over HannStar.
- 23 6. The Complaint should be dismissed on grounds of *forum non*  
24 *conveniens*.
- 25 7. Plaintiff's claims are barred because it did not purchase any liquid  
26 crystal display panels directly from defendants and plaintiff is thus an indirect  
27 purchaser.

28

1           8.       Plaintiff's claims are barred from recovery of any damages because of  
2 and to the extent of its failure to mitigate damages.

3           9.       Plaintiff's claims for damages are barred because the alleged damages,  
4 if any, are speculative and because of the impossibility of ascertaining and allocating  
5 those alleged damages.

6           10.      Any injuries or damages plaintiff may have suffered were caused solely  
7 and proximately by the acts and omissions of others.

8           11.      Plaintiff's claims are barred by the doctrines of waiver, estoppel, laches,  
9 and/or unclean hands.

10          12.      To the extent that any actionable conduct occurred, plaintiff's claims  
11 against HannStar are barred because all such conduct would have been committed by  
12 individuals acting *ultra vires*.

13          13.      Plaintiff's claims against HannStar are barred to the extent that it has  
14 agreed to arbitration or chosen a different forum for the resolution of its claims.

15          14.      Plaintiff's claims are barred, in whole or in part, because it lacks  
16 antitrust standing to bring or maintain the claims set forth in the Complaint.

17          15.      Plaintiff's claims should be dismissed because it has not suffered actual,  
18 cognizable antitrust injury of the type antitrust laws are intended to remedy.

19          16.      Plaintiff's claims should be dismissed to the extent that these claims are  
20 barred, in whole or in part, because plaintiff would be unjustly enriched if it were  
21 allowed to recover some or all of the damages alleged in the Complaint.

22          17.      Plaintiff's claims should be dismissed to the extent that these claims are  
23 barred, in whole or in part, due to the absence of any injury or damage for which  
24 HannStar's actions, conduct, or omissions were the proximate cause.

25          18.      Plaintiff's claims for injunctive relief should be dismissed because  
26 plaintiff has available an adequate remedy at law.

27          19.      Plaintiff's claims are barred, in whole or in part, because the alleged  
28 conduct of HannStar that is the subject of the Complaint was caused by, due to, based



1 upon, or in response to directives, laws, regulations, policies, and/or acts of  
2 governments, governmental agencies and entities, and/or regulatory agencies, and such  
3 is non-actionable or privileged.

4 20. Plaintiff's claims should be dismissed to the extent that they are barred,  
5 in whole or in part, because any and all injuries alleged in the Complaint, the fact and  
6 extent of which are specifically denied, were directly and proximately caused or  
7 contributed to by the statements, acts, and/or omissions of Plaintiff and/or third parties  
8 or entities other than HannStar.

9 21. Plaintiff's claims should be dismissed to the extent that they are barred,  
10 in whole or in part, because HannStar's actions did not lessen competition in the  
11 relevant market.

12 22. Plaintiff's claims should be dismissed to the extent that they are barred,  
13 in whole or in part, because plaintiff did not detrimentally rely upon any or all of the  
14 alleged deceptive trade conduct as alleged in the Complaint.

15 23. Without admitting that plaintiff is entitled to recover damages in this  
16 matter, HannStar is entitled to set off from any recovery plaintiff may obtain against  
17 HannStar of any amount paid to plaintiff by any other Defendants who have settled, or  
18 do settle, plaintiff's claims in this matter.

19 24. Plaintiff's claims are barred by plaintiff's lack of standing to prosecute  
20 its claims.

21 25. Plaintiff's claims should be dismissed to the extent they are barred, in  
22 whole or in part, because any injury or damage alleged in the Complaint, which  
23 HannStar denies, was passed on to persons or entities other than plaintiff.

24 26. Plaintiff's claims should be dismissed to the extent they are barred, in  
25 whole or in part, because any injury or damage alleged in the Complaint, which  
26 HannStar denies, was not incurred by or passed on to plaintiff, or was incurred by or  
27 passed on to persons or entities other than plaintiff.

28

1           27.     Plaintiff's claims are barred, in whole or in part, because HannStar's  
2 alleged conduct did not unreasonably restrain trade.

3           28.     Plaintiff's claims are barred, in whole or in part, because any acts or  
4 practices by HannStar that are the subject of the Complaint were cost justified or  
5 otherwise economically justified and resulted from a good faith effort to meet  
6 competition or market conditions.

7           29.     To the extent HannStar is found liable for damages, the fact and extent  
8 of which HannStar denies, those damages must be reduced in proportion to HannStar's  
9 degree of fault.

10          30.     Plaintiff's claims are barred, in whole or in part, to the extent they are  
11 based on alleged acts, conduct, or statements that are specifically permitted by law.

12          31.     To the extent plaintiff's claims would result in HannStar paying  
13 damages to more than one claimant for the same alleged overcharge, these claims are  
14 barred because such multiple recoveries would violate rights guaranteed to HannStar  
15 by the U.S. Constitution and other law, including, without limitation, rights guaranteed  
16 under the Due Process Clause of the Fourteenth Amendment, and by applicable state  
17 law.

18          32.     Plaintiff's claims are barred, in whole or in part, by the U.S.  
19 Constitution and/or applicable state law to the extent plaintiff's claims seek the  
20 improper extraterritorial application of the laws of the various states cited to any  
21 transactions occurring outside those various states.

22          33.     Plaintiff's claims are barred in whole or in part as premised upon  
23 privileged conduct or actions by HannStar.

24          34.     Plaintiff's requests for relief are barred, in whole or in part, to the extent  
25 the restitution sought in the Complaint is unmanageable and inequitable.

26          35.     HannStar withdrew from any conspiracy alleged in the Complaint to the  
27 extent such alleged conspiracy existed, which is denied.

28

1 36. Plaintiff's claims are barred, in whole or in part, to the extent that  
2 privity of contract is required to establish its claims.

3 37. HannStar adopts and incorporates by reference all defenses and  
4 affirmative defenses asserted by any and all other defendants in this action.

5 38. HannStar reserves the right to amend, supplement and add to the  
6 affirmative defenses listed herein.

7 **PRAYER FOR RELIEF**

8 HannStar respectfully requests that the Court dismiss the Complaint and any  
9 and all claims set forth in the Complaint with prejudice; that the Court award HannStar  
10 its attorneys' fees and costs in defending this action; and that the Court grant HannStar  
11 such other relief as the Court deems just.

12 Dated: March 5, 2012.

13 K&L GATES LLP

14 By /s/ Ramona M. Emerson  
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**CERTIFICATE OF SERVICE BY E-MAIL**  
(Federal Rules of Civil Procedure Rule 5(b))

I declare that I am employed with the law firm of K&L Gates, LLP, whose address is 925 4<sup>th</sup> Avenue, Suite 2900, Seattle, Washington 98104-1158. I am not a party to the case, and I am over the age of eighteen years.

I further declare that on March 5, 2012, I served a copy of:

**DEFENDANT HANNSTAR DISPLAY CORPORATION'S ANSWER TO  
AMENDED COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF OF T-  
MOBILE U.S.A., INC.**

on the following by electronically mailing a true and correct copy to all parties of record through the CM-ECF system in accordance with Federal Rules of Civil Procedure Rule 5(b):

I declare under penalty of perjury that the above is true and correct.

Executed at Seattle, Washington, this 5th day of March, 2012.

---

/s/ Ramona M. Emerson  
Ramona M. Emerson

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