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13
 14 **UNITED STATES DISTRICT COURT**
NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

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

Master File No. C M:07-01827 SI
 MDL NO. 1827

17 This Document Relates to:

18 *Alfred H. Siegel, As Trustee of the Circuit*
 19 *City Stores, Inc. Liquidating Trust v. AU*
 20 *Optronics Corporation, et al.*, Case No.
 10-Cv-05625 SI

21 *AT&T Mobility LLC, et al. v. AU Optronics*
 22 *Corporation, et al.*, Case No. 3:09-cv-4997 SI

23 *Best Buy Co., Inc., et al. v. AU Optronics*
 24 *Corporation, et al.*, Case No. 10-cv-04572 SI

25 *Costco Wholesale Corporation v. AU*
 26 *Optronics Corporation, et al.*, Case No.
 11-cv-00058 SI

**STIPULATION AND [PROPOSED]
 ORDER REGARDING SCHEDULE
 TO ANSWER OR RESPOND TO
 DEFENDANT LG DISPLAY'S
 COUNTERCLAIMS**

27
 28 Master File No. C M:07-01827 SI
 MDL NO. 1827

STIPULATION AND [PROPOSED] ORDER
 REGARDING SCHEDULE TO ANSWER
 OR RESPOND TO DEFENDANT
 LG DISPLAY'S COUNTERCLAIMS

1
2 *Electrograph Systems, Inc., et al. v. Epson*
3 *Imaging Devices Corporation, et al.*, Case No.
10-cv-00117 SI

4 *Interbond Corporation of America v. AU*
5 *Optronics Corporation, et al.*, Case No.
3:11-cv-03763 SI

6 *Jaco Electronics, Inc. v. AU Optronics*
7 *Corporation, et al.*, Case No. 3:11-cv-02495 SI

8 *Motorola Mobility, Inc. v. AU Optronics*
9 *Corporation, et al.*, Case No. 09-5840 SI

10 *Office Depot, Inc. v. AU Optronics*
11 *Corporation, et al.*, Case No. 3:11-cv-02225 SI

12 *P.C. Richard & Son Long Island Corporation,*
13 *et al. v. AU Optronics Corporation, et al.*,
Case No. 3:11-cv-04119 SI

14 *SB Liquidation Trust v. AU Optronics*
15 *Corporation, et al.*, Case No. 10-cv-05458 SI

16 *State of Florida v. AU Optronics Corporation,*
17 *et al.*, Case No. 10-cv-3517 SI.

18 *State of Missouri, et al. v. AU Optronics*
19 *Corporation, et al.*, Case No. 10-cv-03619 SI

20 *State of New York v. AU Optronics*
21 *Corporation, et al.*, Case No. 3:11-cv-711 SI

22 *State of Oregon, ex rel John Kroger, Attorney*
23 *General v. AU Optronics Corporation, et al.*,
Case No. 3:10-cv-4346 SI

24 *T-Mobile U.S.A., Inc. v. AU Optronics*
25 *Corporation, et al.*, Case No 3:11-cv-02591 SI

26 *Target Corp., et al. v. AU Optronics*
27 *Corporation, et al.*, Case No. 10-cv-04945 SI

28 Master File No. C M:07-01827 SI
MDL NO. 1827

STIPULATION AND [PROPOSED] ORDER
REGARDING SCHEDULE TO ANSWER
OR RESPOND TO DEFENDANT
LG DISPLAY'S COUNTERCLAIMS

1 *Tracfone Wireless, Inc. v. AU Optronics*
2 *Corporation, et al.*, Case No. 10-cv-03205 SI

3 Defendants LG Display America, Inc. and LG Display Co., Ltd. (together, “LG Display”) and
4 the Direct Action Plaintiffs (“DAPs”) and State Attorneys General (“AGs”) in the above captioned
5 actions stipulate as follows:

6 WHEREAS, LG Display amended its answers as of right to assert Counterclaims for Declaratory
7 Relief (the “LG Display Counterclaims”) in *Interbond Corporation of America v. AU Optronics*
8 *Corporation, et al.*, Case No. 3:11-cv-03763 SI, *Office Depot, Inc. v. AU Optronics Corporation, et al.*,
9 Case No. 3:11-cv-02225 SI, *P.C. Richard & Son Long Island Corporation, et al. v. AU Optronics*
10 *Corporation, et al.*, Case No. 3:11-cv-04119 SI, *State of New York v. AU Optronics Corporation, et al.*,
11 Case No. 3:11-cv-711, *T-Mobile U.S.A., Inc. v. AU Optronics Corporation, et al.*, Case No 3:11-cv-
12 02591 SI, on March 21, 2012, and in *Jaco Electronics, Inc. v. AU Optronics Corporation, et al.*, Case
13 No. 3:11-cv-02495 SI, on March 23, 2012;

14 WHEREAS LG Display moved for leave to amend its Answers and to assert Additional
15 Defenses and the LG Display Counterclaims in *Alfred H. Siegel, As Trustee of the Circuit City Stores,*
16 *Inc. Liquidating Trust v. AU Optronics Corporation, et al.*, Case No. 10-Cv-05625 SI, *Best Buy Co*
17 *Mobility LLC, et al. v. AU Optronics Corporation, et al.*, Case No. 3:09-cv-4997 SI, *Best Buy Co., Inc.,*
18 *et al. v. AU Optronics Corporation, et al.*, Case No. 10-cv-04572 SI, *Costco Wholesale Corporation v.*
19 *AU Optronics Corporation, et al.*, Case No. 11-cv-00058 SI, *Electrograph Systems, Inc., et al. v. Epson*
20 *Imaging Devices Corporation, et al.*, Case No. 10-cv-00117 SI, *Motorola Mobility, Inc. v. AU Optronics*
21 *Corporation, et al.*, Case No. 09-5840 SI, *SB Liquidation Trust v. AU Optronics Corporation, et al.*,
22 Case No. 10-cv-05458 SI, *State of Florida v. AU Optronics Corporation, et al.*, Case No. 10-cv-3517 SI,
23 *State of Missouri, et al. v. AU Optronics Corporation, et al.*, Case No. 10-cv-03619 SI, *State of Oregon,*
24 *ex rel John Kroger, Attorney General v. AU Optronics Corporation, et al.*, Case No. 3:10-cv-4346 SI,
25 *Target Corp., et al. v. AU Optronics Corporation, et al.*, Case No. 10-cv-04945 SI, *Tracfone Wireless,*

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28 Master File No. C M:07-01827 SI
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STIPULATION AND [PROPOSED] ORDER
REGARDING SCHEDULE TO ANSWER
OR RESPOND TO DEFENDANT
LG DISPLAY’S COUNTERCLAIMS

1 *Inc. v. AU Optronics Corporation, et al.*, Case No. 10-cv-03205 SI, pursuant to Rule 15(a) of the Federal
2 Rules of Civil Procedure on March 22, 2012 (hereafter, “LG Display’s Motion to Amend”);

3 WHEREAS the undersigned DAPs and AGs that were served with LG Display’s Motion to
4 Amend are required to file their Oppositions to that Motion on or before April 27, 2012, and LG Display
5 is required to file its Reply(ies) in support of its Motion on or before May 8, 2012;

6 WHEREAS the DAPs and AGs that were served with the LG Display Counterclaims are
7 currently required to answer, move against, or otherwise respond to those counterclaims on or about
8 April 30, 2012;

9 WHEREAS the parties wish to coordinate the schedule for the briefing of LG Display’s Motion
10 to Amend and responses to the LG Display Counterclaims to allow for a more efficient use of the Court
11 and the parties’ time;

12 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among the
13 undersigned DAPs, AGs, and LG Display, by and through their respective undersigned counsel, as
14 follows:

15 (1) The time for the undersigned DAPS and AGs that have been served with the LG
16 Display Counterclaims to answer, move against, or otherwise respond to the LG Display Counterclaims
17 shall be held in abeyance pending the resolution of LG Display’s Motion to Amend.

18 (2) The time for the undersigned DAPs and AGs, including without limitation the
19 DAPs and AGs already served with the LG Display Counterclaims, to answer, move against, or
20 otherwise respond to the LG Display Counterclaims shall be extended to and including twenty-eight (28)
21 days after the Court rules on LG Display’s Motion to Amend.

22 (3) If the DAPs move against the LG Display Counterclaims, they shall file a
23 combined motion to dismiss. Subject to this requirement, each and every DAP reserves the right to file
24 separate motions to dismiss the LG Display Counterclaims to address any questions of law or fact not
25 common to all DAPs.

1 (4) If the DAPs and/or AGs move to dismiss the LG Display Counterclaims, LG
2 Display shall file its Opposition to such motion twenty-eight (28) days after the DAPs and/or AGs file
3 their respective motions.

4 (5) The DAPs and/or AGs shall have fourteen (14) days to submit their Replies.
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2 SO STIPULATED:

3 Dated: April 26, 2012
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IT IS SO ORDERED.

Dated: _____, 2012

The Honorable Susan Y. Illston
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