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11 *Counsel for Plaintiff T-Mobile U.S.A., Inc.*

12 [Additional counsel listed on signature pages]

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 *Interbond Corporation of America v. AU*  
 19 *Optronics Corporation, et al.*, Case No.  
 3:11-cv-03763 SI  
 20  
 21 *Jaco Electronics, Inc. v. AU Optronics*  
*Corporation, et al.*, Case No. 3:11-cv-02495 SI,  
 22  
 23 *Office Depot, Inc. v. AU Optronics*  
*Corporation, et al.*, Case No. 3:11-cv-02225 SI  
 24  
 25 *P.C. Richard & Son Long Island Corporation,*  
*et al. v. AU Optronics Corporation, et al.*,  
 Case No. 3:11-cv-04119 SI  
 26

**STIPULATION AND [PROPOSED]  
 ORDER EXTENDING TIME 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  
 EXTENDING TIME TO ANSWER  
 OR RESPOND TO DEFENDANT  
 LG DISPLAY’S COUNTERCLAIMS

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

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

12 WHEREAS the DAPs that were served with the LG Display Counterclaims are currently  
13 required to answer, move against, or otherwise respond to those counterclaims by June 22, 2012;

14 WHEREAS if the DAPs move to dismiss the LG Display Counterclaims, LG Display is  
15 currently required to file its Opposition to such motion by July 20, 2012;

16 WHEREAS if the DAPs move to dismiss the LG Display Counterclaims, the DAPs are currently  
17 required to file their Replies in support of such motion by August 3, 2012;

18 WHEREAS the parties desire a reasonable amount of time to answer, move against, or otherwise  
19 respond to the LG Display Counterclaims; and

20 WHEREAS the parties wish to coordinate their responses to the LG Display Counterclaims to  
21 allow for a more efficient use of the Court and the parties’ time;

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

24 (1) The time for the undersigned DAPs to answer, move against, or otherwise  
25 respond to the LG Display Counterclaims shall be extended to July 19, 2012.  
26

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

5 (3) If the DAPs move to dismiss the LG Display Counterclaims, LG Display shall file  
6 its Opposition to such motion by August 16, 2012.

7 (4) The DAPs shall file their Replies (if any) by August 30, 2012.  
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1 SO STIPULATED:  
2 Dated: June \_\_, 2012

3 By:           /s/ Jason C. Rubinstein          

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America, Inc*

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_, 2012

\_\_\_\_\_  
The Honorable Susan Y. Illston  
United States District Judge