

1 Parker C. Folse III (*Pro Hac Vice*)
pfolse@susmangodfrey.com
2 Brooke A. M. Taylor (*Pro Hac Vice*)
btaylor@susmangodfrey.com
3 SUSMAN GODFREY L.L.P.
1201 Third Avenue, Suite 3800
4 Seattle, WA 98101-3000
Telephone: (206) 516-3880

5 Adam Carlis (*Pro Hac Vice*)
6 acarlis@susmangodfrey.com
SUSMAN GODFREY L.L.P.
7 1000 Louisiana Street, Suite 5100
Houston, Texas 77002
8 Telephone: (713) 653-7831

9 Kathryn P. Hoek, CA Bar No. 219247
khoek@susmangodfrey.com
10 SUSMAN GODFREY L.L.P.
1901 Avenue of the Stars, Ste. 950
11 Los Angeles, CA 90067-6029
Telephone: (310) 310-3100

12 ***Counsel for T-Mobile U.S.A., Inc.***
13

Edward A. Friedman (*Pro Hac Vice*)
efriedman@fklaw.com
Daniel B. Rapport (*Pro Hac Vice*)
drapport@fklaw.com
Hallie B. Levin (*Pro Hac Vice*)
hlevin@fklaw.com
Alexander Levi (*Pro Hac Vice*)
alevi@fklaw.com
FRIEDMAN KAPLAN SEILER &
ADELMAN LLP
7 Times Square
New York, NY 10036-6516
Telephone: (212) 833-1100

14 **UNITED STATES DISTRICT COURT**
15 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
16 **SAN FRANCISCO DIVISION**

17 IN RE TFT-LCD (FLAT PANEL)
ANTITRUST LITIGATION

18 This Document Relates to
19 Case C 3:11-02591 SI

20 T-MOBILE U.S.A., INC.,

21 Plaintiff,

22 v.

AU OPTRONICS CORPORATION, et al.,

23 Defendants.

Master File No. C M:07-01827 SI
Individual Case No. C 3:11-02591 SI
MDL NO. 1827

**STIPULATION OF DISMISSAL OF
SANYO CONSUMER ELECTRONICS
CO. AND [PROPOSED] ORDER**

24 Plaintiff T-Mobile U.S.A., Inc. (“T-Mobile”) and Defendant Sanyo Consumer
25 Electronics Co., Ltd., now Business Administrative Department, SANYO Electric Co., Ltd.
26 (“Sanyo”), by and through undersigned counsel, stipulate and agree that T-Mobile hereby
27

1 dismisses with prejudice all claims being asserted against Sanyo in the above-captioned action
2 pursuant to Rule 41(a)(2) of the Federal Rules of Civil Procedure. In support of this
3 stipulation of dismissal, the parties state as follows:

4 1. T-Mobile and Sanyo seek the dismissal with prejudice of all claims asserted against
5 Sanyo in this action.

6 2. This stipulation does not affect the rights or claims T-Mobile may have against any
7 other defendant or co-conspirator in this litigation.

8 3. Each party shall bear its own costs and attorneys' fees.

9 WHEREFORE, the parties respectfully request that this Court issue the Proposed
10 Order of Dismissal.

11 **IT IS SO STIPULATED.**

12 Dated: July 3, 2013. SUSMAN GODFREY L.L.P.

13 By: /s/ Brooke A.M. Taylor
14 Parker C. Folsie III (pro hac vice)
15 E-Mail: pfolsie@susmangodfrey.com
16 Brooke A. M. Taylor (pro hac vice)
17 E-Mail: btaylor@susmangodfrey.com
18 SUSMAN GODFREY L.L.P.
1201 Third Ave, Suite 3800
Seattle, WA 98101
Telephone: (206) 516-3880
Facsimile: (206) 516-3883

19 Adam Carlis (Admitted *Pro Hac Vice*)
20 E-Mail: acarlis@susmangodfrey.com
21 SUSMAN GODFREY L.L.P.
1000 Louisiana Street, Suite 5100
Houston, Texas 77002
22 Telephone: (713) 653-7831

23 Kathryn P. Hoek, CA Bar No. 219247
24 E-Mail: khoek@susmangodfrey.com
25 SUSMAN GODFREY L.L.P.
1901 Avenue of the Stars, Ste. 950
Los Angeles, CA 90067-6029
Telephone: (310) 310-3100

26 Edward A. Friedman (pro hac vice)
27 E-Mail: efriedman@fklaw.com

28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Daniel B. Rapport (pro hac vice)
E-Mail: drapport@fklaw.com
Hallie B. Levin (pro hac vice)
E-Mail: hlevin@fklaw.com
Alexander Levi (pro hac vice)
E-Mail: alevi@fklaw.com
FRIEDMAN KAPLAN SEILER & ADELMAN
7 Times Square
New York, NY 10036-6516
Telephone: (212) 833-1100
Facsimile: (212) 833-1250

Counsel for T-Mobile U.S.A., Inc.

Dated: July 3, 2013.

DAVIS WRIGHT TREMAINE LLP

By: /s/ Allison A. Davis

Allison A. Davis

E-Mail: allisondavis@dwt.com

DAVIS WRIGHT TREMAINE LLP

505 Montgomery Street, Suite 800

San Francisco, CA 94111

Telephone: (415) 276-6580

Counsel for Sanyo Consumer Electronics Co., Ltd.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

[PROPOSED] ORDER

The Court having considered the stipulation of the parties, and good cause appearing therefore, orders as follows:

- 1. All claims asserted by T-Mobile U.S.A., Inc. against Defendant Sanyo Consumer Electronics Co., Ltd., now Business Administrative Department, SANYO Electric Co., Ltd., in the underlying action are hereby dismissed with prejudice pursuant to FRCP 41(a)(2); and,
- 2. Each party shall bear its own costs and attorneys' fees.

IT IS SO ORDERED.

Dated entered: _____

The Honorable Susan Illston
District Court Judge

ATTESTATION PURSUANT TO GENERAL ORDER 45

Pursuant to General Order No. 45, § X(B), regarding signatures, I attest under penalty of perjury that the concurrence in the filing of this document has been obtained from its signatories.

Dated: July 3, 2013

By: /s/ Brooke A.M. Taylor