

1 William A. Isaacson (admitted *pro hac vice*)  
 BOIES, SCHILLER & FLEXNER LLP  
 2 5301 Wisconsin Ave. NW, Suite 800  
 Washington, D.C. 20015  
 3 Telephone: (202) 237-2727  
 Facsimile: (202) 237-6131  
 4 Email: wisaacson@bsfllp.com

5 Philip J. Iovieno (admitted *pro hac vice*)  
 Anne M. Nardacci (admitted *pro hac vice*)  
 6 Christopher V. Fenlon (admitted *pro hac vice*)  
 BOIES, SCHILLER & FLEXNER LLP  
 7 10 North Pearl Street, 4th Floor  
 Albany, NY 12207  
 8 Telephone: (518) 434-0600  
 Facsimile: (518) 434-0665  
 9 Email: piovieno@bsfllp.com  
 anardacci@bsfllp.com  
 10 cfenlon@bsfllp.com

11 *Counsel for Plaintiff*  
 SCHULTZE AGENCY SERVICES, LLC

12  
 13 **UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
 14 **SAN FRANCISCO DIVISION**

15  
 16 In re: TFT-LCD (FLAT PANEL)  
 ANTITRUST LITIGATION

Master File No. 3:07-md-01827-SI (N.D. Cal.)  
 Case No. 3:11-cv-03856-SI (N.D. Cal.)  
 MDL No. 1827

17  
 18 This Document Relates To Individual Case No.  
 3:11-cv-03856-SI (N.D. Cal.)

19 SCHULTZE AGENCY SERVICES, LLC on  
 20 behalf of TWEETER OPCO, LLC AND  
 TWEETER NEWCO, LLC

21 Plaintiff,

22 vs.

23 AU OPTRONICS CORPORATION, et al.,

24 Defendants.

**STIPULATION OF EXTENSION OF  
 TIME TO RESPOND TO COMPLAINT,  
 WAIVER OF SERVICE AND  
 [PROPOSED] ORDER**

1  
2 WHEREAS, plaintiff Schultze Agency Services, LLC (“Schultze Agency Services”) on  
3 behalf of Tweeter Opco, LLC (“Tweeter Opco”) and Tweeter Newco, LLC (“Tweeter Newco”)  
4 (collectively “Tweeter”) filed a complaint in the above-captioned case against AU Optronics  
5 Corporation, AU Optronics Corporation America, Chi Mei Optoelectronics Corporation, Chi Mei  
6 Optoelectronics USA, Inc., CMO Japan Co., Ltd., Epson Electronics America, Inc., Epson  
7 Imaging Devices Corporation, HannStar Display Corporation, Hitachi Electronic Devices (USA),  
8 Inc., Hitachi, Ltd., Hitachi Displays, Ltd., LG Display Co., Ltd., LG Display America, Inc., Mitsui  
9 & Co. (Taiwan), Ltd., Mitsui & Co. (U.S.A.), Inc., NEC Corporation of America, NEC Display  
10 Solutions of America, Inc., NEC Electronics America, Inc., Samsung Electronics America, Inc.,  
11 Samsung Electronics Co., Inc., Samsung Semiconductor, Inc., Sanyo Consumer Electronics Co.,  
12 Ltd., Sharp Corporation, Sharp Electronics Corporation, Tatung Company of America, Inc.,  
13 Toshiba America Electronic Components, Inc., Toshiba America Information Systems, Inc.,  
14 Toshiba Corporation, and Toshiba Mobile Display Co., Ltd. (collectively, “Stipulating  
15 Defendants”) on July 1, 2011 (“Complaint”);

16 WHEREAS, Tweeter wishes to avoid the burden and expense of serving process on the  
17 Stipulating Defendants;

18 WHEREAS, the Stipulating Defendants desire a reasonable amount of time to respond to  
19 the Complaint; and

20 WHEREAS, Tweeter and the Stipulating Defendants believe that proceeding on a unified  
21 response date will create efficiency for the Court and the parties.

22 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among the  
23 undersigned counsel, on behalf of their respective clients, Tweeter, on the one hand, and the  
24 Stipulating Defendants, on the other hand, as follows:

25 1. The Stipulating Defendants waive service of the Complaint under Federal Rule of  
26 Civil Procedure 4(d). This stipulation does not constitute a waiver by the Stipulating Defendants  
27 of any other substantive or procedural defense, including but not limited to the defenses of lack of  
28 personal or subject matter jurisdiction and improper venue.

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

2. The Stipulating Defendants' deadline to move to dismiss, answer, or otherwise respond to the Complaint will be ninety (90) days from the execution of this stipulation, subject to Federal Rule of Civil Procedure 6(a)(1).

DATED: July 22, 2011

/s/ William A. Isaacson  
William A. Isaacson (admitted *pro hac vice*)  
BOIES, SCHILLER & FLEXNER LLP  
5301 Wisconsin Ave. NW, Suite 800  
Washington, D.C. 20015  
Telephone: (202) 237-2727  
Facsimile: (202) 237-6131  
Email: [wisaacson@bsflp.com](mailto:wisaacson@bsflp.com)

Philip J. Iovieno (admitted *pro hac vice*)  
Anne M. Nardacci (admitted *pro hac vice*)  
Christopher V. Fenlon (admitted *pro hac vice*)  
BOIES, SCHILLER & FLEXNER LLP  
10 North Pearl Street, 4th Floor  
Albany, NY 12207  
Telephone: (518) 434-0600  
Facsimile: (518) 434-0665  
Email: [piovieno@bsflp.com](mailto:piovieno@bsflp.com)  
[anardacci@bsflp.com](mailto:anardacci@bsflp.com)  
[cfenlon@bsflp.com](mailto:cfenlon@bsflp.com)

*Counsel for Plaintiff  
Schultze Agency Services, LLC*

/s/ Christopher A. Nedeau  
Christopher A. Nedeau (CA Bar No. 81297)  
Carl L. Blumenstein (CA Bar No. 124158)  
Katharine Chao (CA Bar No. 247571)  
NOSSAMAN LLP  
50 California Street, 34th Floor  
San Francisco, California 94111-4799  
(415) 398-3600 (Phone)  
(415) 398-2438 (Facsimile)  
[cnedeau@nossaman.com](mailto:cnedeau@nossaman.com)  
[cblumenstein@nossaman.com](mailto:cblumenstein@nossaman.com)  
[kchao@nossaman.com](mailto:kchao@nossaman.com)

*Counsel for Defendants AU Optronics Corporation and  
AU Optronics Corporation America*

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

/s/ Neal A. Potischman

Christopher B. Hockett (SBN 121539)  
Neal A. Potischman (SBN 254862)  
Sandra West (SBN 250389)  
Samantha H. Knox (SBN 254427)  
Micah G. Block (SBN 270712)  
DAVIS POLK & WARDWELL LLP  
1600 El Camino Real  
Menlo Park, California 94025  
(650) 752-2000 / (650) 752-2111  
chris.hockett@davispolk.com  
neal.potischman@davispolk.com  
sandra.west@davispolk.com  
samantha.knox@davispolk.com  
micah.block@davispolk.com

Jonathan D. Martin (admitted *pro hac vice*)  
Bradley R. Hansen (admitted *pro hac vice*)  
DAVIS POLK & WARDWELL LLP  
450 Lexington Avenue  
New York, New York 10017  
(212) 450-4000 / (212) 701-5800  
jonathan.martin@davispolk.com  
bradley.hansen@davispolk.com

*Counsel for Defendants Chimei Innolux Corporation (f/k/a  
Chi Mei Optoelectronics Corp.), Chi Mei Optoelectronics  
USA, Inc., and CMO Japan Co., Ltd.*

/s/ Stephen P. Freccero

Melvin R. Goldman (CA Bar No. 34097)  
Stephen P. Freccero (CA Bar No. 131093)  
Derek F. Foran (CA Bar No. 224569)  
MORRISON & FOERSTER LLP  
425 Market Street  
San Francisco, CA 94105-2482  
(415) 268-7000 (Phone)  
(415) 268-7522 (Facsimile)  
mgoldman@mofocom  
sfreccero@mofocom  
dforan@mofocom

*Counsel for Defendants Epson Electronics America, Inc.  
and Epson Imaging Devices Corporation*

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

/s/ Ramona M. Emerson  
Hugh F. Bangasser (admitted *pro hac vice*)  
Ramona M. Emerson (admitted *pro hac vice*)  
Christopher M. Wyant (admitted *pro hac vice*)  
K&L GATES LLP  
925 Fourth Avenue, Suite 2900  
Seattle, WA 98104  
(206) 623-7580 (Phone)  
(206) 370-6371 (Facsimile)  
*romana.emerson@klgates.com*

*Counsel for Defendant HannStar Display Corporation*

/s/ Kent M. Roger  
Kent M. Roger (CA Bar No. 95987)  
Herman J. Hoying (CA Bar No. 257495)  
MORGAN LEWIS & BOCKIUS LLP  
One Market, Spear Street Tower  
San Francisco, CA 94105-1126  
(415) 442-1000 (Phone)  
(415) 442-1001 (Facsimile)  
*kroger@morganlewis.com*  
*hhoying@morganlewis.com*

*Counsel for Defendants Hitachi, Ltd., Hitachi Displays,  
Ltd. and Hitachi Electronic Devices (USA), Inc.*

/s/ Michael R. Lazerwitz  
Michael R. Lazerwitz, Esq. (admitted *pro hac vice*)  
Lee F. Berger, Esq. (CA Bar No. 222756)  
CLEARY GOTTLIEB STEEN &  
HAMILTON LLP  
2000 Pennsylvania Avenue, NW  
Washington, DC 20006  
Telephone: (202) 974-1500  
Facsimile: (202) 974-1999  
Email: *mlazerwitz@cgsh.com*  
*lberger@cgsh.com*

*Counsel for Defendants LG Display Co. Ltd.  
and LG Display America, Inc.*

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

/s/ Michael E. Mumford  
Paul P. Eyre  
Ernest E. Vargo  
Michael E. Mumford  
BAKER & HOSTETLER LLP  
PNC Center  
1900 East Ninth Street, Suite 3200  
Cleveland, Ohio 44114-3482  
(216) 621-0200 (Phone)  
(216) 696-0740 (Facsimile)  
*peyre@bakerlaw.com*  
*evargo@bakerlaw.com*  
*mmumford@bakerlaw.com*

*Counsel for Defendant Mitsui & Co. (Taiwan), Ltd. and  
Mitsui & Co. (U.S.A.), Inc.*

/s/ George D. Niespolo  
George D. Niespolo (CA Bar No. 72107)  
Stephen H. Sutro (CA Bar No. 172168)  
DUANE MORRIS LLP  
1 Market, Spear Tower, Suite 2200  
San Francisco, CA 94105-1104  
(415) 957-3000 (Phone)  
(415) 957-3001 (Facsimile)  
*gdniespolo@duanemorris.com*  
*shsutro@duanemorris.com*

*Counsel for Defendants NEC Corporation of America,  
NEC Display Solutions of America, Inc., and NEC  
Electronics America, Inc.*

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

/s/ Neil K. Roman  
Neil K. Roman  
Daniel M. Sulieman  
Derek Ludwin  
Robert D. Wick  
COVINGTON & BURLING  
1201 Pennsylvania Avenue, N.W.  
Washington, DC 20004-2401  
212-662-5695  
Fax: 212-778-5695  
Email: nroman@cov.com  
dsuleiman@cov.com  
dludwin@cov.com  
rwick@cov.com

Simon J. Frankel  
Jeffrey Michael Davidson  
COVINGTON & BURLING LLP  
One Front Street  
San Francisco, CA 94111  
415-591-6000  
Fax: 415-591-6091  
Email: sfrankel@cov.com  
j davidson@cov.com

*Counsel for Defendants Samsung  
Semiconductor, Inc., Samsung Electronics  
Co., Ltd., and Samsung Electronics America, Inc.*

/s/ Allison A. Davis  
Allison A. Davis (CA Bar No. 139203)  
DAVIS WRIGHT TREMAINE LLP  
505 Montgomery Street, Suite 800  
San Francisco, CA 94111-6533  
(415) 276-6500 (Phone)  
(415) 276-6599 (Facsimile)  
allisondavis@dwt.com

*Counsel for Defendant 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

/s/ Jacob R. Sorensen  
John M. Grenfell (CA Bar No. 88500)  
Jacob R. Sorensen (CA Bar No. 209134)  
Fusae Nara (*pro hac vice*)  
PILLSBURY WINTHROP SHAW PITTMAN LLP  
50 Fremont Street  
San Francisco, CA 94105  
(415) 983-1000 (Phone)  
(415) 983-1200 (Facsimile)  
*john.grenfell@pillsburylaw.com*  
*jake.sorensen@pillsburylaw.com*  
*fusae.nara@pillsburylaw.com*

*Counsel for Defendants Sharp Corporation and Sharp Electronics Corporation*

/s/ Rachel S. Brass  
Rachel S. Brass  
GIBSON, DUNN & CRUTCHER LLP  
555 Mission Street, Suite 3000  
San Francisco, CA 94105-2933  
(415) 393-8200 (Phone)  
(415) 393-8306 (Facsimile)  
*rbrass@gibsondunn.com*

*Counsel for Defendant Tatum Company of America, Inc.*

/s/ John H. Chung  
John H. Chung  
WHITE & CASE LLP  
1155 Avenue of the Americas  
New York, NY 10036-2787  
(212) 819-8200 (Phone)  
(212) 354-8113 (Facsimile)  
*jchung@whitecase.com*

*Counsel for Defendants Toshiba Corporation, Toshiba America Electronic Components, Inc., Toshiba America Information Systems, Inc., and Toshiba Mobile Display Co., Ltd.*

Pursuant to General Order 45, Part X-B, the filer attests that concurrence in the filing of this document has been obtained from stipulating defendants.



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

**IT IS SO ORDERED.**

Dated: 8/19/11, 2011



Susan Illston  
Susan Illston, United States District Judge