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10 *Attorneys for Philips Electronics North America Corporation*

11  
 12 **UNITED STATES DISTRICT COURT**  
 13 **NORTHERN DISTRICT OF CALIFORNIA**  
 14 **SAN FRANCISCO DIVISION**

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

17 This Document Relates to:  
 Case No. 11-cv-2591

18 T-MOBILE U.S.A., INC.,  
 19 Plaintiff,

20 v.

21 AU OPTRONICS CORPORATION, *et al.*,

22 Defendants.  
 23  
 24  
 25

) Master File No. M07-1827 SI

) MDL No. 1827

) Case No. 11-cv-2591

) **DECLARATION OF SHAWN JOE**  
 ) **LICHAA IN SUPPORT OF PHILIPS**  
 ) **ELECTRONICS NORTH AMERICA**  
 ) **CORPORATION'S JOINDER TO**  
 ) **MOTION TO DISMISS T-MOBILE**  
 ) **U.S.A., INC.'S COMPLAINT**

) Judge: The Hon. Susan Illston  
 ) Courtroom: 10, 19th Floor  
 ) Hearing Date: October 28, 2011  
 ) Hearing Time: 9:00 a.m.


1 I, SHAWN JOE LICHAA, hereby declare as follows:

2 1. I am a member of the Bar of the State of California and I am associated with  
3 Sullivan & Cromwell LLP, attorney for Defendant Philips Electronics North America Corporation  
4 ("PENAC"). I submit this declaration in support of PENAC's Joinder to Motion to Dismiss T-Mobile  
5 U.S.A., Inc.'s Complaint. If called as a witness, I could and would testify competently to the facts  
6 herein.

7 2. Attached hereto as Exhibit 1 is a true and correct copy of the executed tolling  
8 agreement PENAC and the direct purchaser plaintiffs entered into as of October 31, 2007.

9 I declare under the penalty of perjury under the laws of the United States that the  
10 foregoing is true and correct.

11 Executed in Palo Alto, CA, this 15th day of September, 2011.

12  
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14 \_\_\_\_\_  
15 Shawn Joe Lichaa