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12 Attorneys for Defendants Mitsui & Co. (Taiwan),  
13 Ltd. and Mitsui & Co. (U.S.A.), Inc.

14  
15 UNITED STATES DISTRICT COURT  
16 NORTHERN DISTRICT OF CALIFORNIA  
17 SAN FRANCISCO DIVISION

19 IN RE: TFT-LCD (FLAT PANEL)  
ANTITRUST LITIGATION

Case No. 3:11-cv-03763-SI

20 This Document Relates to Individual Case  
21 No. 3:11-cv-03763-SI

Master File No. 3:07-md-1827-SI

MDL No. 1827

22 INTERBOND CORPORATION OF  
23 AMERICA,

24 Plaintiff,

25 v.

26 AU OPTRONICS CORPORATION, et al.,

27 Defendants.

STIPULATION OF EXTENSION OF TIME  
FOR DEFENDANTS MITSUI & CO.  
(TAIWAN), LTD. AND MITSUI & CO.  
(U.S.A.), INC. TO RESPOND TO THE  
FIRST AMENDED COMPLAINT AND  
[~~PROPOSED~~] ORDER

**Clerk's Action Required**

1 WHEREAS, plaintiff Interbond Corporation of America d/b/a BrandsMart  
2 (“BrandsMart”) filed a First Amended Complaint in the above-captioned action against  
3 defendants Mitsui & Co. (Taiwan), Ltd. (“Mitsui Taiwan”) and Mitsui & Co. (U.S.A.), Inc.  
4 (“Mitsui USA”), among other defendants, on November 1, 2011.

5 WHEREAS, BrandsMart, Mitsui Taiwan and Mitsui USA, among other defendants,  
6 previously entered into a stipulation giving Mitsui Taiwan and Mitsui USA until December 5,  
7 2011 to move to dismiss, answer or otherwise respond to the First Amended Complaint. (*See*  
8 Dkt. #24; MDL Dkt. #3957.)

9 WHEREAS, on December 1, 2011, Mitsui Taiwan intends to move to dismiss the  
10 amended complaint in the related case of *Electrograph Systems, Inc., et al. v. Epson Imaging*  
11 *Devices Corp., et al.*, Individual Docket No. 3:10-cv-00117-SI (N.D. Cal.), Master Docket No.  
12 3:07-md-01827-SI (N.D. Cal.) on the grounds that the Court lacks personal jurisdiction over  
13 Mitsui Taiwan.

14 WHEREAS, Mitsui Taiwan and Mitsui USA also intend to raise lack of personal  
15 jurisdiction as a defense in the instant case.

16 WHEREAS, the Court’s ruling on Mitsui Taiwan’s motion to dismiss in *Electrograph*  
17 may be relevant to the issue of personal jurisdiction in the instant case.

18 WHEREAS, in the interests of efficiency and judicial economy, BrandsMart, Mitsui  
19 Taiwan and Mitsui USA have reached an agreement, pursuant to Civil Rule L.R. 6-1(a), that  
20 Mitsui Taiwan and Mitsui USA shall have an additional extension of time until twenty-one (21)  
21 days after the Court rules on Mitsui Taiwan’s motion to dismiss in *Electrograph*, in which to  
22 move against, answer, or otherwise respond to BrandsMart’s First Amended Complaint.

23 THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among the  
24 undersigned counsel, on behalf of their respective clients, Plaintiffs, on the one hand, and Mitsui  
25 Taiwan and Mitsui USA, on the other hand, that Mitsui Taiwan and Mitsui USA’s deadline to  
26 move to dismiss, answer, or otherwise respond to the First Amended Complaint will be twenty-  
27 one (21) days after the Court issues its order on Mitsui Taiwan’s motion to dismiss the amended  
28 complaint in *Electrograph*.

1 Dated: November 29, 2011

2 By: /s/ Michael E. Mumford \_\_\_\_\_  
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Attestation: The filer of this document attests that the concurrence of the other signatories thereto has been obtained.

**[PROPOSED] ORDER**

IT IS SO ORDERED.

DATED this 30<sup>th</sup> day of Nov., 2011.

By:   
\_\_\_\_\_  
Hon. SUSAN ILLSTON