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

19 IN RE: TFT-LCD (FLAT PANEL)
ANTITRUST LITIGATION
20
21 This Document Relates to Individual Case
No. 3:11-cv-03856-SI

Case No. 3:11-cv-03856-SI
Master File No. 3:07-md-1827-SI
MDL No. 1827

22 SCHULTZE AGENCY SERVICES, LLC
23 ON BEHALF OF TWEETER OPCO, LLC
AND TWEETER NEWCO, LLC
24
25 Plaintiff,
26 v.
27 AU OPTRONICS CORPORATION, et al.,
28 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 Schultze Agency Services, LLC on behalf of Tweeter Opco, LLC
2 and Tweeter Newco, LLC (“Tweeter”) filed a 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 July 1, 2011.

5 WHEREAS, Tweeter, Mitsui Taiwan and Mitsui USA, among other defendants
6 previously entered into a stipulation giving Tweeter until December 6, 2011 to file a First
7 Amended Complaint, and giving Mitsui Taiwan and Mitsui USA until January 10, 2012 to move
8 to dismiss, answer or otherwise respond to the First Amended Complaint, (*See* Dkt. #22; MDL
9 Dkt. #4087.)

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

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

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

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

24 THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among the
25 undersigned counsel, on behalf of their respective clients, Tweeter on the one hand, and Mitsui
26 Taiwan and Mitsui USA, on the other hand, that Mitsui Taiwan and Mitsui USA’s deadline to
27 move to dismiss, answer, or otherwise respond to the First Amended Complaint will be twenty-
28

1 one (21) days after the Court issues its order on Mitsui Taiwan's motion to dismiss the amended
2 complaint in *Electrograph*.

3
4 Dated: November 29, 2011

5 By: /s/ Michael E. Mumford _____
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