

1 Keith A. Walter, Jr. (*admitted Pro Hac Vice*)
 2 DRINKER BIDDLE & REATH LLP
 3 222 Delaware Avenue, Suite 1410
 4 Wilmington, Delaware 19801
 5 Tel. (302) 467-4200
 6 Fax (302) 467-4201
 7 keith.walter@dbr.com

8 Minda R. Schechter (SBN 065889)
 9 NOVAK DRUCE CONNOLLY BOVE + QUIGG LLP
 10 333 South Grand Ave., 23rd Floor
 11 Los Angeles, California 90071
 12 Tel. (213) 787-2500
 13 Fax (213) 687-0498
 14 minda.schechter@novakdruce.com

15 Attorneys for Defendants
 16 QUANTA STORAGE INC. and
 17 QUANTA STORAGE AMERICA, INC.

18 UNITED STATES DISTRICT COURT
 19 NORTHERN DISTRICT OF CALIFORNIA
 20 SAN FRANCISCO DIVISION

21 IN RE OPTICAL DISK DRIVE
 22 PRODUCTS ANTITRUST LITIGATION

Base Case No. 3:10-md-02143 RS

Case No. 3:13-cv-1877-RS

23 This Document Relates To:

24 STATE OF FLORIDA, OFFICE OF THE
 25 ATTORNEY GENERAL, DEPARTMENT
 26 OF LEGAL AFFAIRS,

Plaintiff,

v.

27 HITACHI-LG DATA STORAGE, INC.,
 28 et al.

Defendants.

ORDER
**STIPULATION FOR EXTENSION OF
 TIME FOR QUANTA STORAGE, INC.
 AND QUANTA STORAGE AMERICA,
 INC. TO RESPOND TO THE STATE OF
 FLORIDA'S SECOND AMENDED
 COMPLAINT**

1 WHEREAS, on April 21, 2014, this Court entered an Order directing that the State of
2 Florida shall have until May 19, 2014, to file a second amended complaint and that defendants
3 shall file responses to the State of Florida’s second amended complaint on or before June 18,
4 2014 (Dkt. No. 1216);

5 WHEREAS, on May 19, 2014, the State of Florida filed its Second Amended Complaint
6 (“Florida’s Second Amended Complaint”);

7 WHEREAS, defendants Quanta Storage, Inc. and Quanta Storage America, Inc. (“the
8 Quanta Defendants”) response to Florida’s Second Amended Complaint is currently due on June,
9 18, 2014;

10 WHEREAS the Quanta Defendants seek a one week extension of time in which to
11 respond to the State of Florida’s second amended complaint because counsel of record Keith A.
12 Walter, Zhun Lu, and Curt Lambert have recently changed law firms from Novak Druce
13 Connolly Bove + Quigg LLP to Drinker Biddle & Reath LLP, which has encumbered the
14 preparation and review of the Quanta Defendants’ responsive pleading;

15 WHEREAS, counsel for the State of Florida have agreed that the Quanta Defendants may
16 have until June 25, 2014 to respond to the second amended complaint;

17 WHEREAS, counsel for the State of Florida informed Minda Schechter, who also called
18 on behalf of the Quanta Defendants, that the State of Florida will not seek a default judgment in
19 view of the agreed-upon extension; and

20 WHEREAS, permitting the Quanta Defendants’ responses to be filed on or before June
21 25, 2014, will have no effect on the schedule for this case.

22 NOW, THEREFORE, it is hereby stipulated and agreed, subject to the approval of the
23 Court, that the Quanta Defendants’ response to the State of Florida’s Second Amended Complaint
24 may be filed on or before June 25, 2014.

25 IN WITNESS WHEREOF, the Quanta Defendants and the State of Florida have caused
26 this Stipulation to be executed by their duly authorized representatives.

1 Dated: June 17, 2014

For the Quanta Defendants:

2 /s/ Minda R. Schechter

Minda R. Schechter (SBN 065889)
3 NOVAK DRUCE CONNOLLY BOVE + QUIGG LLP
333 South Grand Ave., 23rd Floor
4 Los Angeles, California 90071
Tel. (213) 787-2500
5 Fax (213) 687-0498
minda.schechter@novakdruce.com

6 *Attorneys for Defendants*
7 *Quanta Storage, Inc. and*
8 *Quanta Storage America, Inc.*

9 For the State of Florida, Office of the Attorney
General, Department of Legal Affairs:

10 /s/ Lizabeth A. Brady

Lizabeth A. Brady
11 OFFICE OF THE ATTORNEY GENERAL
ANTITRUST DIVISION
12 The Capitol, PL-01
Tallahassee, FL 32399-1050
13 Tel. (850) 414-3851
Fax (850) 488-9134
14 liz.brady@myfloridalegal.com

15 Nicholas J. Weilhammer
OFFICE OF THE ATTORNEY GENERAL
16 STATE OF FLORIDA
The Capitol, PL-01
17 Tallahassee, FL 32399-1050
Tel. (850) 414-3300
18 Fax (850) 488-9134
nicholas.weilhammer@myfloridalegal.com

19 *Attorneys for Plaintiff*
20 *State of Florida*

21
22 Pursuant to General Order 45, Part X.B., I attest that concurrence in the filing of this
23 document has been obtained from the other signatories hereto.

24 /s/ Minda R. Schechter

Minda R. Schechter (SBN 065889)
25 NOVAK DRUCE CONNOLLY BOVE + QUIGG LLP
333 South Grand Ave., 23rd Floor
26 Los Angeles, California 90071
Tel. (213) 787-2500
27 Fax (213) 687-0498
minda.schechter@novakdruce.com


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

Keith A. Walter, Jr. (*admitted pro hac vice*)
DRINKER BIDDLE & REATH LLP
222 Delaware Avenue, Suite 1410
Wilmington, Delaware 19801
Tel. (302) 467-4200
Fax (302) 467-4201
keith.walter@dbr.com

*Attorneys for Defendants
Quanta Storage, Inc. and
Quanta Storage America, Inc.*

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 6/18/14



Hon. Richard Seeborg
United States District Judge