1			
2			
3			
4			
5			
6			
7			
8	UNITED STATES DISTRICT COURT		
9	NORTHERN DISTRICT OF CALIFORNIA		
10	SAN FRANCI	SAN FRANCISCO DIVISION	
11			
12	IN RE OPTICAL DISK DRIVE PRODUCTS	MDL Docket No. 3:10-md-02143 RS	
13	ANTITRUST LITIGATION	Case No. 3:13-cv-1877-RS	
14	This document relates to:	STIPULATION AND [PROPOSED] ORDER REGARDING DEFENDANTS'	
15	STATE OF FLORIDA, OFFICE OF THE	RESPONSE TO MOTION TO STRIKE DEFENDANTS' AFFIRMATIVE	
16	ATTORNEY GENERAL, DEPARTMENT OF LEGAL AFFAIRS,	DEFENSES DEFENSES	
17	Plaintiff,		
18	V.		
19	HITACHI-LG DATA STORAGE, INC., et al.		
20	Defendants.		
21			
22			
23			
24			
25			
26			
2728			
20			

1		
2		1625 Eye Street, NW Washington, DC 20006
3		Telephone: (202) 383-5106
4		Facsimile: (202) 383-5414 isimmons@omm.com
5		Counsel for Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.
6	DATED: July 21, 2014	BOIES SCHILLER & FLEXNER LLP
7	2111221 vary 21, 2011	
8		By: <u>/s/ John F. Cove, Jr.</u> JOHN F. COVE, JR.
9		1999 Harrison Street, Suite 900
10		Oakland, CA 94612
11		Telephone: (510) 874-1000 Facsimile: (510) 874-1460
12		jcove@bsfllp.com
13		Counsel for Defendants Sony Corporation, Sony
14		Electronics, Inc., Sony Optiarc Inc., and Sony
15		Optiarc America Inc.
16	DATED: July 21, 2014	DLA PIPER LLP
		By: /s/ Deana L. Cairo
17		DEANA L. CAIRO
18		500 8th Street, N.W.
19		Washington, DC 20004 Telephone: (202) 799-4523
20		Facsimile: (202) 799-5523 Deana.cairo@dlapiper.com
21		Deana.cano@draprper.com
22		Counsel for Defendants TEAC Corporation and TEAC America Inc.
23	DATED: July 21, 2014	WINSTON & STRAWN LLP
24	_	By/s/ Jeffrey L. Kessler
25		JEFFREY L. KESSLER
26		200 Park Avenue
27		New York, NY 10166 Telephone: (212) 294-6700
28		Facsimile: (212) 294-4700 jkessler@winston.com
		2

1		
2		Counsel for Defendants Panasonic Corporation and Panasonic Corporation of North America
3	DATED: July 21, 2014	WINSTON & STRAWN LLP
4		By <u>/s/ Robert B. Pringle</u> ROBERT B. PRINGLE
5		101 California Street
6		San Francisco, CA 94111-5894 Telephone: (415) 591-1000
7		Facsimile: (415) 591-1400 rpringle@winston.com
8		Counsel for Defendant NEC Corporation
9	DATED: July 21, 2014	ROPES & GRAY LLP
10		By:/s/ Mark S. Popofksy
11		Mark S. POPOFSKY
12		One Metro Center
13		700 12th Street NW, Suite 900 Washington, DC 20005-3948
14		Telephone: (202) 508-4600
15		Facsimile: (202) 508-4650 mark.popofsky@ropesgray.com
16		Counsel for Defendants Hitachi-LG Data Storage,
17	DATED: Int. 21 2014	Inc. and Hitachi-LG Data Storage Korea, Inc.
18	DATED: July 21, 2014	BAKER BOTTS LLP
19		By: <u>/s/ Evan Werbel</u> EVAN WERBEL
20		1299 Pennsylvania Ave. NW
21		Washington, DC 20004 Telephone: (202) 383-7199 Facsimile: (202) 383-6610
22		evan.werbel@bakerbotts.com
23		Counsel for Defendants Koninklijke Philips N.V., Lite-On IT Corp. of Taiwan, Philips & Lite-On
24		Digital Solutions Corp., and Philips & Lite-On Digital Solutions U.S.A., Inc.
25	DATED: July 21, 2014	DICKSTEIN SHAPIRO LLP
26		
27		By: <u>/s/ Lisa M. Kaas</u> LISA M. KAAS
28		3
INSIII		04 14 1FD 110.1

	I	
1		1825 Eye Street NW
2		Washington, DC 20006
		Telephone: (202) 420-2200 Facsimile: (202) 420-2201
3		kaasl@dicksteinshapiro.com
4 5		Counsel for Defendants BenQ Corporation and BenQ America Corp.
6	DATED: July 21, 2014	VINSON & ELKINS LLP
7		By:/s/ Craig P. Seebald
8		CRAIG P. SEEBALD
9		2200 Pennsylvania Ave. NW Suite 500 West
10		Washington, DC 20037-1701
		Telephone: (202) 639-6500 Facsimile: (202) 879-8950
11		cseebald@velaw.com
12		Counsel for Defendant Hitachi, Ltd.
13	DATED: July 21, 2014	JONES DAY
14		By: /s/ Eric P. Enson
15		ERIC P. ENSON
16		555 South Flower Street, Fiftieth Floor
17		Los Angeles, CA 90071 Telephone: (213) 489-3939
18		Facsimile: (213) 243-2539
		epenson@JonesDay.com
19		Counsel for Defendants Pioneer Electronics (USA)
20		Inc., Pioneer North America, Inc., Pioneer Corporation, and Pioneer High Fidelity Taiwan
21		Co., LTD.
22	DATED: July 21, 2014	EIMER STAHL LLP
23		By: /s/ Nathan P. Eimer
24		NATHAN P. EIMER
25		224 South Michigan Avenue, Suite 100 Chicago, IL 60604
26		Telephone: (312) 660-7601
		Facsimile: (312) 692-1718 neimer@eimerstahl.com
27		
28		Counsel for Defendant LG Electronics, Inc.
		4

1	DATED: July 21, 2014 DRINKER BIDDLE & REATH LLP	
2	By:/s/ Keith A. Walter, Jr.	
3	KEITH A. WALTER, JR.	
4	222 Delaware Avenue, Suite 1410	
5	Wilmington, Delaware 19801 Telephone: (302) 467-4200	
6	Facsimile: (302) 467-4201 keith.walter@dbr.com	
7	Counsel for Defendants Quanta Storage, Inc. and	
8	Quanta Storage America, Inc.	
9	DATED: July 21, 2014 STATE OF FLORIDA	
10	By <u>/s/ Nicholas J. Weilhammer</u> NICHOLAS J. WEILHAMMER	
11		
12	Office of the Attorney General State of Florida	
13	PL-01, The Capitol Tallahassee, Florida 32399-1050	
14	Tel: (850) 414-3300 Fax: (850) 488-9134	
15	Liz.Brady@myfloridalegal.com Nicholas.Weilhammer@myfloridalegal.com	
16	Counsel for Plaintiff State of Florida	
17		
18	Pursuant to Civil Local Rule 5-1(i)(3), the filer attests that concurrence in the filing of this document has been obtained from each of the signatories.	
19	PURSUANT TO STIPULATION, IT IS SO ORDERED.	
20		
21	DATED: 7/22/14	
22	HONORABLE RICHARD SEEBORG UNITED STATES DISTRICT COURT JUDGE	
23		
24		
25		
2627		
28		
40	5	