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14
 15 **UNITED STATES DISTRICT COURT**

16 **NORTHERN DISTRICT OF CALIFORNIA**

17 IN RE: OPTICAL DISK DRIVE PRODUCTS
 ANTITRUST LITIGATION

Case No.: 3:13-cv-03350-RS

18 This Document Relates to:

MDL No. 2143

19 DELL INC. and DELL PRODUCTS L.P.

JOINT STIPULATION AND [~~PROPOSED~~]
 ORDER REGARDING SERVICE OF
 PROCESS

20 Plaintiffs,

21 v.

22 HITACHI-LG DATA STORAGE, INC.;
 23 HITACHI-LG DATA STORAGE KOREA, INC.;
 HITACHI, LTD.; PHILIPS & LITE-ON DIGITAL
 24 SOLUTIONS CORP.; PHILIPS & LITE-ON
 DIGITAL SOLUTIONS USA, INC.; LITE-ON IT
 25 CORP. OF TAIWAN; KONINKLIJKE PHILIPS
 N.V.; BENQ CORPORATION; BENQ AMERICA
 26 CORP.; SONY CORPORATION; SONY
 OPTIARC INC.; NEC CORPORATION; SONY
 27 NEC OPTIARC INC.; SONY OPTIARC
 AMERICA INC.; SONY ELECTRONICS, INC.;
 28 TOSHIBA CORPORATION; SAMSUNG

1 ELECTRONICS CO. LTD.; SAMSUNG
2 ELECTRONICS AMERICA, INC.; TOSHIBA
3 AMERICA INFORMATION SYSTEMS, INC.;
4 TOSHIBA SAMSUNG STORAGE
5 TECHNOLOGY CORP.; TOSHIBA SAMSUNG
6 STORAGE TECHNOLOGY CORP. KOREA;

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Defendants.

1 **JOINT STIPULATION**

2 It is stipulated by and between the undersigned parties, by their respective attorneys, that:

3 1. Undersigned counsel of ROPES & GRAY agree to accept service of the Complaint in
4 *Dell Inc. and Dell Products L.P. v. Hitachi-LG Data Storage, Inc., et al.*, Case No. 3:13-cv-03350-
5 RS, on behalf of Defendants Hitachi-LG Data Storage, Inc. and Hitachi-LG Data Storage Korea, Inc.
6 (collectively, the “HLDS Defendants”). The HLDS Defendants shall have until Friday, November
7 22, 2013 to file a response thereto.

8 2. Undersigned counsel of BAKER BOTTS LLP agree to accept service of the
9 Complaint in *Dell Inc. and Dell Products L.P. v. Hitachi-LG Data Storage, Inc., et al.*, Case No.
10 3:13-cv-03350-RS, on behalf of Defendants Koninklijke Philips N.V. (“Philips”), Lite-On IT Corp.
11 of Taiwan (“Lite-On”), Philips & Lite-On Digital Solutions Corp. (“PLDS”) and Philips & Lite-On
12 Digital Solutions U.S.A., Inc. (“PLDS USA”) (collectively, the “Philips Defendants”). The Philips
13 Defendants shall have until Friday, November 22, 2013 to file a response thereto.

14 3. Undersigned counsel of DICKSTEIN SHAPIRO LLP agree to accept service of the
15 Complaint in *Dell Inc. and Dell Products L.P. v. Hitachi-LG Data Storage, Inc., et al.*, Case No.
16 3:13-cv-03350-RS on behalf of Defendants BenQ Corporation and BenQ America Corp.
17 (collectively, the “BenQ Defendants”). The BenQ Defendants shall have until Friday, November 22,
18 2013 to file a response thereto.

19 4. Undersigned counsel of LATHAM & WATKINS LLP agree to accept service of the
20 Complaint in *Dell Inc. and Dell Products L.P. v. Hitachi-LG Data Storage, Inc., et al.*, Case No.
21 3:13-cv-03350-RS, on behalf of Defendants Toshiba Corporation (“Toshiba Corp.”), Toshiba
22 America Information Systems, Inc. (“TAIS”), Toshiba Samsung Storage Technology Corp.
23 (“TSST”), and Toshiba Samsung Storage Technology Korea Corp. (“TSSTK”). Each of Toshiba
24 Corp., TAIS, TSST and TSSTK shall have until Friday, November 22, 2013 to file a response
25 thereto.

26 5. Undersigned counsel of O’MELVENY AND MYERS LLP agree to accept service of
27 the Complaint in *Dell Inc. and Dell Products L.P. v. Hitachi-LG Data Storage, Inc., et al.*, Case No.
28 3:13-cv-03350-RS, on behalf of Defendants Samsung Electronics Co. Ltd. (“Samsung”) and

1 Samsung Electronics America, Inc. (“SEA”) (collectively, the “Samsung Defendants”). The
2 Samsung Defendants shall have until Friday, November 22, 2013 to file a response thereto.

3 6. Undersigned counsel of WINSTON & STRAWN LLP agree to accept service of the
4 Complaint in *Dell Inc. and Dell Products L.P. v. Hitachi-LG Data Storage, Inc., et al.*, Case No.
5 3:13-cv-03350-RS, on behalf of Defendant NEC Corporation (“NEC”). NEC shall have until
6 Friday, November 22, 2013 to file a response thereto.

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8 IT IS SO STIPULATED.

9 Dated: September 9, 2013

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17 Attorney for Plaintiffs Dell Inc. and Dell
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19 Dated: September 9, 2013

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27 Attorney for Defendants Hitachi-LG Data
28 Storage, Inc. and Hitachi-LG Data Storage
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1 Dated: September 9, 2013

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12 N.V., Lite-On IT Corp. of Taiwan, and Philips
13 & Lite-On Digital Solutions Corp., and Philips
14 & Lite-On Digital Solutions U.S.A., Inc.

15 Dated: September 9, 2013

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25 Attorneys for Defendants BenQ Corporation
26 and BenQ America Corp.

27 Dated: September 9, 2013

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28 */s/ Ian Simmons*

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Attorney for Defendants Samsung Electronics
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Inc.

1 Dated: September 9, 2013

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Attorney for Defendants Toshiba Corporation,
Toshiba America Information Systems, Inc.,
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Corp., and Toshiba Samsung Storage
Technology Corp. Korea

10 Dated: September 9, 2013

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Attorney for Defendant NEC Corporation

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24 IT IS SO ORDERED.

25 Dated: 9/12/13



RICHARD SEEBORG
UNITED STATES DISTRICT JUDGE