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10 Attorneys for Plaintiff Hewlett-Packard Company

11 **UNITED STATES DISTRICT COURT**
 12 **NORTHERN DISTRICT OF CALIFORNIA**
 13 **SAN FRANCISCO DIVISION**

14 IN RE OPTICAL DISK DRIVE PRODUCTS
 15 ANTITRUST LITIGATION

MDL Docket No. 3:10-md-02143-RS-JCS

16 This Document relates to:

Case No. 3:13-cv-5371-RS

17 Hewlett-Packard Company,
 18 Plaintiff,

**STIPULATION AND ~~PROPOSED~~
 ORDER REGARDING SERVICE OF
 PROCESS**

19 v.
 20 LG Electronics, Inc.; LG Electronics USA,
 Inc.; Hitachi-LG Data Storage, Inc.;
 21 Hitachi-LG Data Storage Korea, Inc.;
 Koninklijke Philips N.V.; Lite-On IT
 22 Corporation of Taiwan; BenQ Corporation;
 Philips BenQ Digital Storage; BenQ America
 23 Corporation; Philips & Lite-On Digital
 Solutions Corporation; Philips & Lite-On
 24 Digital Solutions USA, Inc.; Pioneer
 Corporation; Pioneer North America, Inc.;
 25 Pioneer Electronics (USA) Inc.; Pioneer High
 Fidelity Taiwan Co., Ltd.; Sharp Corporation;
 26 and Pioneer Digital Design & Manufacturing
 Company,

Judge Richard Seeborg

27 Defendants.
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STIPULATION AND [PROPOSED] ORDER REGARDING SERVICE OF PROCESS – CASE NO. 3:13-cv-05371-RS

1 April 17, 2014 to file a response thereto.

2 6. This Stipulation does not constitute a waiver by Defendants of any defense,
3 including but not limited to those defenses provided under Rule 12 of the Federal Rules of Civil
4 Procedure.

5 7. To the extent any Defendant or Defendants move to dismiss the Complaint under
6 Rule 12(b)(6) of the Federal Rules of Civil Procedure or otherwise, the parties shall work in good
7 faith to reach an agreed-upon briefing schedule that they shall present to the Court no later than
8 Thursday, May 1, 2014, but in no event shall Hewlett-Packard's response to any such motion(s)
9 be due before Monday, June 16, 2014.

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1 IT IS SO STIPULATED.

2 Dated: January 17, 2014

**BARTLIT BECK HERMAN PALENCHAR
& SCOTT LLP**

/s/ Lester C. Houtz
Lester C. Houtz
Attorneys for Plaintiff
HEWLETT-PACKARD COMPANY

6 Dated: January 17, 2014

EIMER STAHL LLP

/s/ Nathan P. Eimer
Nathan P. Eimer
Attorneys for Defendants
LG Electronics, Inc. and LG Electronics USA,
Inc.

11 Dated: January 17, 2014

ROPES & GRAY LLP

/s/ Mark S. Popofsky
Mark S. Popofsky
Attorneys for Defendants
Hitachi-LG Data Storage, Inc. and Hitachi-LG
Data Storage Korea, Inc.

16 Dated: January 17, 2014

BAKER BOTTS LLP

/s/ John M. Taladay
John M. Taladay
Attorneys for Defendants
Koninklijke Philips N.V.; Philips & Lite-On
Digital Solutions Corporation; Philips & Lite-
On Digital Solutions USA, Inc.; Lite-On It
Corporation of Taiwan

21 Dated: January 17, 2014

DICKSTEIN SHAPIRO LLP

/s/ Joel B. Kleinman
Joel B. Kleinman
Attorneys for Defendants
BenQ Corporation and BenQ America
Corporation

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Dated: January 17, 2014

JONES DAY

/s/ Eric P. Enson

Eric P. Enson

Attorneys for Defendants

Pioneer North America, Inc.; Pioneer

Electronics (USA) Inc.; Pioneer Corporation

and Pioneer High Fidelity Taiwan Co., Ltd.

ATTESTATION

Pursuant to Rule 5-1(i)(3) of the Local Rules of Practice in Civil Proceedings Before the United States District Court for the Northern District of California, I hereby attest that concurrence in the filing of this document has been obtained from each of the other signatories.

Dated: January 17, 2014

/s/ Lester C. Houtz

Lester C. Houtz

PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated: 1 / 24 / _____, 2014



Honorable Richard S. Oborg

United States District Judge