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5 Attorneys for Plaintiffs
 Ingram Micro Inc. and Synnex Corporation

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 8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10 SAN FRANCISCO DIVISION
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12 IN RE OPTICAL DISK DRIVE PRODUCTS
 13 ANTITRUST LITIGATION

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

14 This document relates to:

Case No. 3:13-cv-05372-RS

15 Ingram Micro Inc. and Synnex Corporation,
 16 Plaintiffs,

**STIPULATION AND [PROPOSED]
 ORDER REGARDING SERVICE OF
 PROCESS**

17 v.

Judge Richard Seeborg

18 LG Electronics, Inc.; LG Electronics USA,
 19 Inc.; Hitachi-LG Data Storage, Inc.; Hitachi-
 LG Data Storage Korea, Inc.; Koninklijke
 Philips N.V.; Lite-On IT Corporation of
 20 Taiwan; BenQ Corporation; BenQ America
 Corporation; Philips & Lite-On Digital
 21 Solutions Corporation; Philips & Lite-On
 Digital Solutions USA, Inc.; Toshiba
 22 Corporation; Toshiba America Information
 Systems, Inc.; Sony Corporation; Sony
 23 Electronics, Inc.; NEC Corporation; Sony NEC
 Optiarc Inc.; Sony Optiarc Inc.; Sony Optiarc
 24 America Inc.; Panasonic Corp.; Panasonic
 Corporation of North America; TEAC
 25 Corporation; TEAC America, Inc.; Quanta
 Storage, Inc.; and Quanta Storage America,
 26 Inc.,

27 Defendants.
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1 **STIPULATION**

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

3 1. Undersigned counsel of EIMER STAHL LLP agree to accept service of the
4 Complaint in *Ingram Micro Inc., et al. v. LG Electronics Inc., et al.*, Case No. 3:13-cv-05372-RS,
5 on behalf of Defendants LG Electronics, Inc. and LG Electronics USA, Inc. (collectively, the “LG
6 Electronics Defendants”). The LG Electronics Defendants shall have until Thursday, April 17,
7 2014, to file a response thereto.

8 2. Undersigned counsel of ROPES & GRAY LLP agree to accept service of the
9 Complaint in *Ingram Micro Inc., et al. v. LG Electronics Inc., et al.*, Case No. 3:13-cv-05372-RS,
10 on behalf of Defendants Hitachi-LG Data Storage, Inc. and Hitachi-LG Data Storage Korea, Inc.
11 (collectively, the “HLDS Defendants”). The HLDS Defendants shall have until Thursday, April
12 17, 2014, to file a response thereto.

13 3. Undersigned counsel of BAKER BOTTS LLP agree to accept service of the
14 Complaint in *Ingram Micro Inc., et al. v. LG Electronics Inc., et al.*, Case No. 3:13-cv-05372-RS,
15 on behalf of Defendants Koninklijke Philips N.V. (“Philips”), Lite-On IT Corp. of Taiwan (“Lite-
16 On”), Philips & Lite-On Digital Solutions Corp. (“PLDS”), and Philips & Lite-On Digital
17 Solutions U.S.A., Inc. (“PLDS USA”) (collectively, the “Philips Defendants”). The Philips
18 Defendants shall have until Thursday, April 17, 2014, to file a response thereto.

19 4. Undersigned counsel of DICKSTEIN SHAPIRO LLP agree to accept service of
20 the Complaint in *Ingram Micro Inc., et al. v. LG Electronics Inc., et al.*, Case No. 3:13-cv-05372-
21 RS, on behalf of Defendants BenQ Corporation and BenQ America Corp. (collectively, the
22 “BenQ Defendants”). The BenQ Defendants shall have until Thursday, April 17, 2014, to
23 answer, move to dismiss, or otherwise respond thereto.

24 5. Undersigned counsel of LATHAM & WATKINS LLP agree to accept service of
25 the Complaint in *Ingram Micro Inc., et al. v. LG Electronics Inc., et al.*, Case No. 3:13-cv-05372-
26 RS, on behalf of Defendants Toshiba Corporation (“Toshiba Corp.”) and Toshiba America
27 Information Systems, Inc. (“TAIS”). Each of Toshiba Corp. and TAIS shall have until Thursday,
28 April 17, 2014, to file a response thereto.

1 6. Undersigned counsel of WINSTON & STRAWN LLP agree to accept service of
2 the Complaint in *Ingram Micro Inc., et al. v. LG Electronics Inc., et al.*, Case No. 3:13-cv-05372-
3 RS, on behalf of Defendant NEC Corporation (“NEC”). Defendant NEC shall have until
4 Thursday, April 17, 2014, to file a response thereto.

5 7. Undersigned counsel of BOIES SCHILLER & FLEXNER LLP agree to accept
6 service of the Complaint in *Ingram Micro Inc., et al. v. LG Electronics Inc., et al.*, Case No. 3:13-
7 cv-05372-RS, on behalf of Defendants Sony Optiarc America Inc. (“SOA”) and Sony Electronics,
8 Inc. (“SEI”). Defendants Sony Corporation and Sony Optiarc Inc. (“Sony Optiarc”) agree to
9 waive service of the Complaint, and Plaintiffs Ingram Micro Inc. and Synnex Corporation will
10 mail a copy of the Complaint to Sony Corporation and Sony Optiarc via certified mail or United
11 Parcel Service, addressed and delivered to a designated individual in the Sony Corporation Legal
12 Department in Japan. The deadline for Defendants SOA, SEI, Sony Corporation, and Sony
13 Optiarc (collectively, the “Sony/Optiarc Defendants”) to answer, move to dismiss, or otherwise
14 respond to the Complaint shall be extended to Thursday, April 17, 2014.

15 8. Undersigned counsel of WINSTON & STRAWN LLP agree to accept service of
16 the Complaint in *Ingram Micro Inc., et al. v. LG Electronics Inc., et al.*, Case No. 3:13-cv-05372-
17 RS, on behalf of Defendants Panasonic Corporation and Panasonic Corporation of North America
18 (collectively, the “Panasonic Defendants”). The Panasonic Defendants shall have until Thursday,
19 April 17, 2014, to file a response thereto.

20 9. Undersigned counsel of KATTEN MUCHIN ROSENMAN LLP agree to accept
21 service of the Complaint in *Ingram Micro Inc., et al. v. LG Electronics Inc., et al.*, Case No.
22 3:13-cv-05372-RS, on behalf of Defendants TEAC Corporation and TEAC America Inc.
23 (collectively, the “TEAC Defendants”). The TEAC Defendants waive service of the Complaint
24 under Rule 4(d) of the Federal Rules of Civil Procedure. Those TEAC Defendants who reside in
25 foreign countries that are signatories to the Hague Convention shall be deemed served as
26 provided for by that Convention by sending the Complaint to counsel. The TEAC Defendants
27 shall have until Thursday, April 17, 2014, to file a response thereto.

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

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

9 IT IS SO STIPULATED.

10 Dated: January 17, 2014

CROWELL & MORING LLP

/s/ Daniel A. Sasse

Daniel A. Sasse
Attorneys for Plaintiffs
Ingram Micro Inc. and Synnex Corporation

15 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.

1 Dated: January 17, 2014

ROPES & GRAY LLP

2

/s/ Mark S. Popofsky

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Mark S. Popofsky

Attorneys for Defendants

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Hitachi-LG Data Storage, Inc. and Hitachi-LG Data
Storage Korea, Inc.

5

6 Dated: January 17, 2014

BAKER BOTTS LLP

7

/s/ Evan Werbel

8

Evan Werbel

Attorneys for Defendants

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

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11

12 Dated: January 17, 2014

DICKSTEIN SHAPIRO LLP

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/s/ Lisa M. Kaas

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Lisa M. Kaas

Attorneys for Defendants

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BenQ Corporation and BenQ America Corp.

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17 Dated: January 17, 2014

LATHAM & WATKINS LLP

18

/s/ Belinda Lee

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Belinda Lee

Attorneys for Defendants

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Toshiba Corporation and Toshiba America Information
Systems, Inc.

21

22 Dated: January 17, 2014

WINSTON & STRAWN LLP

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/s/ Robert B. Pringle

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Robert B. Pringle

Attorneys for Defendant

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NEC Corporation

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1 Dated: January 17, 2014

BOIES SCHILLER & FLEXNER LLP

2

/s/ John F. Cove, Jr.

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John F. Cove, Jr.

Attorneys for Defendants

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Sony Corporation, Sony Optiarc America, Inc., Sony
Optiarc Inc., and Sony Electronics, Inc.

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6 Dated: January 17, 2014

WINSTON & STRAWN LLP

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/s/ Jeffrey L. Kessler

8

Jeffrey L. Kessler

Attorneys for Defendants

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Panasonic Corporation and Panasonic Corporation of
North America

10

11 Dated: January 17, 2014

KATTEN MUCHIN ROSENMAN LLP

12

/s/ Mary Ellen Hennessy

13

Mary Ellen Hennessy

Aharon S. Kaye

14

Attorneys for Defendants

TEAC Corporation and TEAC America Inc.

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FILER ATTESTATION

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Pursuant to Rule 5-1(i)(3) of the Local Rules of Practice in Civil Proceedings Before the

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United States District Court for the Northern District of California, I, Daniel A. Sasse, hereby

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attest that concurrence in the filing of this document has been obtained from each of the other

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signatories.

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Dated: January 17, 2014

/s/ Daniel A. Sasse

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Daniel A. Sasse

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 1/24, 2014



Hon. Richard Seeborg
United States District Judge