

1 Christopher M. Neumeyer (CSB No. 151994)
 2 Asia Law Foreign Legal Affairs Law Firm
 3 17F, Suite B, No. 167
 4 Dunhua North Road
 5 Taipei 10549, Taiwan
 6 Telephone: +886-2-2717-1999
 7 chrisneumeyer@asialaw.biz

8 Attorneys for Defendants
 9 Quanta Storage, Inc. and Quanta Storage
 10 America, Inc.

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-05372-RS

17 Ingram Micro Inc., et al.,

**STIPULATION AND ~~PROPOSED~~
 ORDER REGARDING EXTENSION OF
 TIME TO RESPOND TO AMENDED
 COMPLAINT AND SERVICE OF
 PROCESS**

18 Plaintiffs,

19 v.

20 LG Electronics, Inc., et al.,

Hon. Richard Seeborg

21 Defendants.

[Fed. R. Civ. P. 4 and Civil L.R. 6-1]

1 **STIPULATION**

2 WHEREAS on October 25, 2013, Plaintiffs Ingram Micro Inc. (“Ingram Micro”) and
3 Synnex Corporation (“Synnex”) filed a Complaint for Damages and Injunctive Relief [Doc. No.
4 1] (the “Complaint”) naming Quanta Storage, Inc. (“QSI”) and Quanta Storage America, Inc.
5 (“QSA”), among others, as defendants; and

6 WHEREAS on March 26, 2014, Plaintiffs Ingram Micro and Synnex and Defendants QSI
7 and QSA signed a Stipulation and [Proposed] Order Regarding Extension of Time to Respond to
8 Complaint and Service of Process, in which QSI and QSA agreed to waive service of a summons
9 under Rule 4 of the Federal Rules of Civil Procedure and to waive any objections to the absence
10 of service of a summons and the Complaint, and the parties to the stipulation agreed to extend the
11 deadline for QSI and QSA to answer or otherwise respond to the Complaint to Tuesday, June 24,
12 2014, and this Court granted an Order based on that stipulation; and

13 WHEREAS on April 17, 2014 other defendants in this action, not including QSI and QSA
14 (the “Other Defendants”), filed a Joint Motion to Dismiss the Complaint in this matter; and

15 WHEREAS on April 30, 2014, Plaintiffs Ingram Micro and Synnex and the Other
16 Defendants signed a Stipulation and Proposed Order Continuing Hearing on Defendants’ Joint
17 Motion to Dismiss and Extending Time to File First Amended Complaint, which states that (i)
18 “Plaintiffs wish to amend their Complaint,” (ii) plaintiffs’ deadline to amend the Complaint shall
19 be extended to June 16, 2014, (iii) the Other Defendants’ Joint Motion to Dismiss the Complaint
20 shall be withdrawn, and (iv) the Other Defendants shall have forty-five (45) days from the filing
21 of the amended complaint to file a response, and this Court granted an Order based on that
22 stipulation;

23 NOW, THEREFORE, Plaintiffs Ingram Micro and Synnex and Defendants Quanta
24 Storage, Inc., and Defendant Quanta Storage America, Inc., through their respective counsel,
25 hereby stipulate and agree that:

26 1. Defendants Quanta Storage, Inc. and Quanta Storage America, Inc. shall not be
27 required to answer or otherwise respond to the Complaint by June 24, 2014, as stated in the prior
28 stipulation signed by QSI and QSA; and

1 2. In the event that Plaintiffs Ingram Micro Inc. and Synnex Corporation file an
2 amended Complaint by June 16, 2014, Defendants Quanta Storage, Inc. and Quanta Storage
3 America, Inc. shall have forty-five (45) days from the filing of such amended Complaint to
4 respond thereto; and

5 3. In the event that Plaintiffs Ingram Micro and Synnex Corporation fail to file an
6 amended Complaint by June 16, 2014, Defendants Quanta Storage, Inc. and Quanta Storage
7 America, Inc. shall have forty-five (45) days from June 16, 2014 to answer or otherwise respond
8 to the (un-amended) Complaint.

9 IT IS SO STIPULATED.

10 ///

11 ///

12 Dated: June 13 , 2014

CROWELL & MORING LLP

13
14 By: /S/ Daniel A. Sasse

Daniel A. Sasse

Angela J. Yu

Attorneys for Plaintiffs

Ingram Micro Inc. and Synnex Corporation

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17
18 Dated: June 13 , 2014

ASIA LAW FOREIGN LEGAL AFFAIRS LAW FIRM

19
20
21 By: /S/ Christopher M. Neumeyer

Christopher M. Neumeyer (CSB No. 151994)

Asia Law Foreign Legal Affairs Law Firm

17F, Suite B, No. 167

Dunhua North Road

Taipei 10549, Taiwan

Telephone: +886 (2) 2717-1999

chrisneumeyer@asialaw.biz

Attorneys for Defendants

Quanta Storage, Inc. and Quanta Storage America, Inc.

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FILER 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, Christopher M. Neumeyer, hereby attest that concurrence in the filing of this document has been obtained from each of the other signatories.

Dated: June 13, 2014

ASIA LAW FOREIGN LEGAL AFFAIRS LAW FIRM

By: /S/ Christopher M. Neumeyer

Christopher M. Neumeyer

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

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED

DATED: 6/13/14



Honorable Richard Seeborg
United States District Judge