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12 *Attorneys for Plaintiff Target Corporation*

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 14 **UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
 15 **SAN FRANCISCO DIVISION**

16  
 17 IN RE: CATHODE RAY TUBE (CRT)  
 ANTITRUST LITIGATION

18  
 19 This Document Relates to:  
 20  
 21 *Target Corp. v. Chunghwa Picture Tubes,*  
*Ltd., et al., Case No. 3:11-cv-05514-SC*  
 22  
 23 *Target Corp., et al. v. Technicolor SA, et*  
*al., Case No. 3:13-cv-05686-SC*

Master File No. 3:07-cv-05944-SC

MDL No. 1917

**STIPULATION AND ~~PROPOSED~~**  
**ORDER DISMISSING WITH PREJUDICE**  
**PLAINTIFF'S CLAIMS UNDER STATE**  
**LAW**

Judge: Hon. Samuel Conti

1 Pursuant to Rule 41(a)(1) of the Federal Rules of Civil Procedure, plaintiff Target  
2 Corporation (“Plaintiff”), and defendants Chunghwa Picture Tubes, Ltd., Chunghwa Picture  
3 Tubes (Malaysia), Irico Group Corporation, Irico Group Electronics Co., Ltd., Irico Display  
4 Devices Co., Ltd., LG Electronics, Inc., LG Electronics USA, Inc., LP Displays International  
5 Ltd., Hitachi, Ltd., Hitachi Displays, Ltd., Hitachi America, Ltd., Hitachi Asia, Ltd., Hitachi  
6 Electronic Devices (USA), Inc., Panasonic Corporation, Panasonic Corporation of North  
7 America, MT Picture Display Co., Ltd., Beijing Matsushita Color CRT Co., Ltd., Koninklijke  
8 Philips Electronics N.V., Philips Electronics North America Corporation, Philips Electronics  
9 Industries (Taiwan), Ltd., Philips da Amazonia Industria Electronica Ltda., Samsung SDI Co.,  
10 Ltd., Samsung SDI America, Inc., Samsung SDI Mexico S.A. de C.V., Samsung SDI Brasil  
11 Ltda., Shenzhen Samsung SDI Co., Ltd., Tianjin Samsung SDI Co., Ltd., Samsung SDI  
12 (Malaysia) Sdn. Bhd., Samtel Color Ltd., Thai CRT Co., Ltd., Toshiba Corporation, Toshiba  
13 America, Inc., Toshiba America Consumer Products, LLC, Toshiba America Electronic  
14 Components, Inc., Toshiba America Information Systems, Inc., Technicolor SA (f/k/a Thomson  
15 SA); Technicolor USA, Inc. (f/k/a Thomson Consumer Electronics, Inc.), Videocon Industries,  
16 Ltd., Technologies Displays Americas LLC (f/k/a Thomson Displays Americas LLC),  
17 Mitsubishi Electric Corporation, Mitsubishi Electric Visual Solutions America, Inc., and  
18 Mitsubishi Electric & Electronics USA, Inc., being all the defendants in this case (collectively,  
19 “Defendants”) state as follow:

20 On October 3, 2013, Target Corporation filed its Second Amended Complaint (“SAC”) in  
21 individual case number 3:11-cv-05514-SC (MDL Master Dkt. No. 1981). On December 9, 2013,  
22 Target filed its Complaint in individual case number 3:13-cv-05686-SC (Ind. Case Dkt. No. 1)  
23 (the “Thomson/Mitsubishi/TDA Complaint”). The SAC and the Thomson/Mitsubishi/TDA  
24 Complaint are the “Complaints.” In the Complaints, Target asserts claims for relief against  
25 Defendants under the Sherman Act, the California Cartwright Act, California’s Unfair  
26 Competition Law, California Business and Professional Code §17200, *et seq.*, Arizona Revised  
27 Stat. § 44-1401, *et seq.*, Florida Stat. §501.201, *et seq.*, Illinois Antitrust Act, 740 Illinois Code

1 10/1, *et seq.*, Iowa Code §§ 553.1, *et. seq.*, Kansas Stat. Ann. §§ 50-101, *et. seq.*, Michigan  
2 Comp. Laws Ann. §§ 445.771, *et seq.*, Minnesota Stat. §§ 325D.50, *et seq.*, New York General  
3 Business Law §§ 340, *et seq.*, North Carolina Gen. Stat. §§ 75-1, *et seq.*, and Wisconsin Stat. §§  
4 133.01, *et seq.*

5 Plaintiff now desires to dismiss with prejudice its claims against Defendants under the  
6 California Cartwright Act, California's Unfair Competition Law, California Business and  
7 Professional Code §17200, *et seq.*, Arizona Revised Stat. § 44-1401, *et seq.*, Florida Stat.  
8 §501.201, *et seq.*, Illinois Antitrust Act, 740 Illinois Code 10/1, *et seq.*, Iowa Code §§ 553.1, *et.*  
9 *seq.*, Kansas Stat. Ann. §§ 50-101, *et. seq.*, Michigan Comp. Laws Ann. §§ 445.771, *et seq.*,  
10 Minnesota Stat. §§ 325D.50, *et seq.*, New York General Business Law §§ 340, *et seq.*, North  
11 Carolina Gen. Stat. §§ 75-1, *et seq.*, and Wisconsin Stat. §§ 133.01, *et seq.* Plaintiff is not  
12 dismissing, and will continue to prosecute, its claims against Defendants under the Sherman Act.

13 NOW, THEREFORE, THE PARTIES STIPULATE AND AGREE that the claims of  
14 Plaintiff asserted against Defendants in these cases under the California Cartwright Act,  
15 California's Unfair Competition Law, California Business and Professional Code §17200, *et*  
16 *seq.*, Arizona Revised Stat. § 44-1401, *et seq.*, Florida Stat. §501.201, *et seq.*, Illinois Antitrust  
17 Act, 740 Illinois Code 10/1, *et seq.*, Iowa Code §§ 553.1, *et. seq.*, Kansas Stat. Ann. §§ 50-101,  
18 *et. seq.*, Michigan Comp. Laws Ann. §§ 445.771, *et seq.*, Minnesota Stat. §§ 325D.50, *et seq.*,  
19 New York General Business Law §§ 340, *et seq.*, North Carolina Gen. Stat. §§ 75-1, *et seq.*, and  
20 Wisconsin Stat. §§ 133.01, *et seq.* are dismissed with prejudice. Both Plaintiff and Defendants  
21 agree to bear their own costs and fees with respect to the dismissed claims. This dismissal does  
22 not apply to the claims of Plaintiff asserted against Defendants in these cases under the Sherman  
23 Act.

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1 Dated: November 5, 2014

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1 Pursuant to General Order No. 45, § X-B, the filer asserts that concurrence in the filing of  
2 this document has been obtained from each of the above signatories.

3  
4 Dated: November 5, 2014

By: /s/ Jason C. Murray  
Jason C. Murray

5 **IT IS SO ORDERED.**

6  
7 Dated: 11/24/2014

