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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

<p>IN RE FLASH MEMORY ANTITRUST LITIGATION</p>	<p>No. C07-00086 SBA</p> <p><b>STIPULATION AND ORDER FOR DISMISSAL WITH PREJUDICE AS TO HITACHI AND RENESAS DEFENDANTS PURSUANT TO FED. R. CIV. PROC. 41(a)(2)</b></p>
<p>This document Relates to:</p> <p>ALL INDIRECT PURCHASER ACTIONS</p>	

1 Pursuant to Rule 41(a)(2) of the Federal Rules of Civil Procedure, Plaintiffs Keith  
2 Alderman, Christopher Bessette, Peter Burke, James Burt, California Coast Investigative  
3 Services, Anthony Cardinale, Michael Chek, Alva Dee Cravens, Peter DeChristopher, Donna  
4 Fahner, Eric Ferguson, Donna Jeanne Flanagan, Ina Fryer, Stuart Go, Sandra Green, Dan  
5 Harrison, Thomas Y. Huh, James Knowles, Fred W. Krahmer, Harold Moore, Martha Mulvey,  
6 Joanne Myles, Thomas Nigro, Carman Pellitteri, Travis Richardson, Richard Chris Rippel, Ryan  
7 Skorstad, Lynn Sweatman, and Joseph Theisen, (collectively “Indirect-Purchaser Plaintiffs”) and  
8 defendants Hitachi America, Ltd., Hitachi, Ltd., Renesas Electronics Corporation (as successor  
9 to Renesas Technology Corporation), and Renesas Electronics America, Inc. (as successor to  
10 Renesas Technology America, Inc. and Hitachi Semiconductor (America) Inc.) (“Hitachi-  
11 Renesas”) (collectively “The Stipulating Parties”) by and through their counsel hereby stipulate  
12 as follows:

13 1. On May 1, 2009, the Indirect-Purchaser Plaintiffs filed a First Amended  
14 Consolidated Class Action Complaint against Hitachi-Renesas in the above-entitled action.<sup>1</sup>

15 2. The Stipulating Parties have reached a confidential settlement of all claims  
16 asserted by Indirect Purchaser Plaintiffs against Hitachi-Renesas in the above-entitled action.

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26 <sup>1</sup> Plaintiffs Keith Alderman, James Knowles, Fred W. Krahmer, Carman Pellitteri, Ryan  
27 Skorstad, and Lynn Sweatman, had previously filed complaints against Hitachi-Renesas but were  
28 not included as named plaintiffs in the First Consolidated Class Action Complaint.

1                   3.       In furtherance of the confidential settlement, the Stipulating Parties agree  
2 that all claims asserted by Indirect Purchaser Plaintiffs against Hitachi-Renesas in the above-  
3 entitled action shall be dismissed with prejudice, with Indirect Purchaser Plaintiffs and Hitachi-  
4 Renesas each bearing their own costs and attorneys' fees and Hitachi-Renesas shall no longer be  
5 a party in this action.<sup>2</sup>

6                   IT IS SO STIPULATED.

7 DATED: June 4, 2012.

COTCHETT, PITRE & McCARTHY, LLP

8  
9 By:           /s/ Steven N. Williams            
Steve N. Williams

10                   *Co-Lead Counsel for Indirect Purchaser*  
11                   *Plaintiffs*

12 DATED: June 4, 2012.

ZELLE HOFMANN VOELBEL & MASON  
LLP

13  
14 By:           /s/ Christopher T. Micheletti            
Christopher T. Micheletti

15                   *Co-Lead Counsel for Indirect Purchaser*  
16                   *Plaintiffs*

17 DATED: June 4, 2012.

VINSON & ELKINS LLP

18  
19 By:           /s/ Craig Seebald            
Craig Seebald

20                   *Counsel for Hitachi America, Ltd., Hitachi,*  
21                   *Ltd., Renesas Electronics Corporation, and*  
22                   *Renesas Electronics America, Inc.*

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25 <sup>2</sup> The confidential settlement also includes the following plaintiffs, who dismissed their claims  
26 with prejudice as to all defendants on April 25, 2012 (Dkt. 764): Jacob Greenwell, Sarah Hecht,  
27 Jean McClellan-Chambers, Jamac Enterprises, Robin McEntee, Trong Nguyen, Jason Perkins,  
28 Travis Weibe, Joshua Steele, Benjamin Northway, Lindsey Morgan, Kelly Fahner, George  
Davis, Andrew Kindt, Tristen Woods, and Jai Paguirigan.

**ATTESTATION PURSUANT TO GENERAL ORDER 45**

Pursuant to General Order No. 45, § X(B), regarding signatures, I attest that the concurrence in the filing of this document has been obtained from its signatories.

Dated: June 4, 2012

By:           /s/ Steven N. Williams            
          Steven N. Williams

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**ORDER**

For the reasons set forth in the above stipulation, and good cause appearing therefore, it is hereby ORDERED as follows:

1. All claims asserted by Indirect Purchaser Plaintiffs against Hitachi-Renesas in the above-entitled action or any of its associated actions are hereby DISMISSED WITH PREJUDICE, with Indirect Purchaser Plaintiffs and Hitachi America, Ltd., Hitachi, Ltd., Renesas Electronics Corporation (as successor to Renesas Technology Corporation), and Renesas Electronics America, Inc. (as successor to Hitachi Semiconductor (America) Inc. and Renesas Technology America, Inc.), each bearing their own costs and attorneys' fees.

2. Hitachi America, Ltd., Hitachi, Ltd., Renesas Electronics Corporation (as successor to Renesas Technology Corporation), and Renesas Electronics America, Inc. (as successor to Hitachi Semiconductor (America) Inc. and Renesas Technology America, Inc.) shall no longer be a party in this action.

IT IS SO ORDERED.

DATED: 6/4/12



Sandra Brown Armstrong  
United States District Judge