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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 SAMSUNG SEMICONDUCTOR, INC. AND SAMSUNG ELECTRONICS COMPANY, LTD. 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, Peter Burke, James Burt, California Coast Investigative Services, Anthony Cardinale,  
3 Michael Chek, Alva Dee Cravens, Peter DeChristopher, Donna Fahner, Eric Ferguson, Donna  
4 Jeanne Flanagan, Ina Fryer, Fred Gentile, Stuart Go, Sandra Green, Dan Harrison, Thomas Y.  
5 Huh, James Knowles, Fred W. Krahmer, Harold Moore, Martha Mulvey, Joanne Myles, Thomas  
6 Nigro, Carman Pellitteri, Travis Richardson, Richard Chris Rippel, Ryan Skorstad, Lynn  
7 Sweatman, and Joseph Theisen, (collectively “Indirect-Purchaser Plaintiffs”) and defendants  
8 Samsung Semiconductor, Inc. (“SSI”) and Samsung Electronics Corporation, Ltd. (“SEC”) (with  
9 Indirect-Purchaser Plaintiffs, SSI and SEC as, collectively, “The Stipulating Parties”) by and  
10 through their counsel hereby stipulate as follows:

11 1. On May 1, 2009, the Indirect-Purchaser Plaintiffs filed a First Amended  
12 Consolidated Class Action Complaint against SSI and SEC in the above-entitled action.<sup>1</sup>

13 2. The Stipulating Parties have reached a confidential settlement of all claims  
14 asserted by Plaintiffs against SSI and SEC in the above-entitled action, in which SSI and SEC  
15 have denied any liability or wrongdoing.

16 3. In furtherance of the confidential settlement, the Stipulating Parties agree  
17 that all claims asserted by Plaintiffs against SSI and SEC in the above-entitled action shall be  
18 dismissed with prejudice, with Plaintiffs and SSI and SEC each bearing their own costs and  
19 attorneys’ fees and SSI and SEC shall no longer be parties in this action.<sup>2</sup>

20 IT IS SO STIPULATED.  
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23 <sup>1</sup> Plaintiffs Keith Alderman, Fred Gentile, James Knowles, Fred W. Krahmer, Carman Pellitteri,  
24 Ryan Skorstad, and Lynn Sweatman, had previously filed complaints against SSI and SEC but  
were not included as named plaintiffs in the First Consolidated Class Action Complaint.

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,  
Travis Weibe, Joshua Steele, Benjamin Northway, Lindsey Morgan, Kelly Fahner, George  
28 Davis, Andrew Kindt, Tristen Woods, and Jai Paguirigan.

1 DATED: November 9, 2012.

COTCHETT, PITRE & McCARTHY, LLP

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

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*Co-Lead Counsel for Indirect Purchaser  
Plaintiffs*

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6 DATED: November 9, 2012.

ZELLE HOFMANN  
VOELBEL & MASON LLP

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

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*Co-Lead Counsel for Indirect Purchaser  
Plaintiffs*

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DATED: November 9, 2012.

LATHAM & WATKINS

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By: /s/ Harold Barza  
Harold Barza

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*Counsel for Samsung Semiconductor, Inc.  
and Samsung Electronics Company, Ltd.*

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**ATTESTATION PURSUANT TO GENERAL ORDER 45**

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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.

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Dated: November 9, 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 Plaintiffs against Samsung Semiconductor, Inc. (“SSI”) and Samsung Electronics Company, Ltd. (“SEC”) in the above-entitled action or any of its associated actions are hereby DISMISSED WITH PREJUDICE, with Plaintiffs and SSI and SEC each bearing their own costs and attorneys’ fees.

2. SSI and SEC shall no longer be parties in this action.

IT IS SO ORDERED.

DATED: \_12/13/12

  
\_\_\_\_\_  
Sandra Brown Armstrong  
United States District Judge