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 LG CHEM, LTD, and
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14
 15 **UNITED STATES DISTRICT COURT**
 16 **NORTHERN DISTRICT OF CALIFORNIA**
 17 **OAKLAND DIVISION**

18
 19 IN RE: LITHIUM ION BATTERIES
 ANTITRUST LITIGATION

Master File No. 4:13-md-02420-YGR
MDL NO. 2420

Case No. 4:15-cv-3443-YGR

20 This Document Relates to:

21 MICROSOFT MOBILE, INC., et al.
 22 Plaintiffs,

23 v.

24 LG CHEM AMERICA, INC., et al.
 25 Defendants.

**STIPULATION AND [PROPOSED]
 ORDER EXTENDING THE LG CHEM
 DEFENDANTS' TIME TO RESPOND TO
 MICROSOFT MOBILE'S COMPLAINT**

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1 Individual Action Plaintiffs Microsoft Mobile Inc. and Microsoft Mobile Oy (collectively
2 “Microsoft Mobile”) and Defendants LG Chem, Ltd. and LG Chem America, Inc. (collectively “LG
3 Chem”), together “the Parties,” through their respective counsel of record, hereby Stipulate as follows:

4 WHEREAS, the Parties entered into a stipulation on August 11, 2015 (ECF No. 776)
5 (“Stipulation”) to waive service of Microsoft Mobile’s complaint filed on June 26, 2015 (“Microsoft
6 Mobile’s Complaint” or “Complaint”) and to extend LG Chem’s deadline to respond to the Complaint
7 by ninety (90) days from the date on which the Stipulation was entered as an Order of the Court; and
8

9 WHEREAS the Court entered an Order granting the Stipulation on August 12, 2015 (ECF No.
10 779), thereby setting the deadline for LG Chem to respond to Microsoft Mobile’s Complaint as
11 November 10, 2015;

12 WHEREAS the Parties have met and conferred and desire to extend the deadline for LG Chem
13 to respond to Microsoft Mobile’s Complaint to January 15, 2016;

14 WHEREFORE, it is stipulated:

- 15
- 16 1. LG Chem shall file an Answer to the Microsoft Mobile Complaint by or before January
17 15, 2016.
 - 18 2. The Parties agree that this extension will not be used to prejudice Microsoft Mobile’s
19 efforts to seek discovery in the above referenced action.
 - 20 3. The parties agree that LG Chem does not waive and continues to preserve all of its
21 defenses under the Federal Rules of Civil Procedure.
- 22

23 **IT IS SO STIPULATED.**

24 ///

25 ///

26 ///

1 Dated: November 6, 2015

2 Respectfully submitted,

3 AKIN GUMP STRAUSS HAUER & FELD LLP ALSTON & BIRD LLP

4 By /s/ Reginald Steer

5 By /s/ B. Parker Miller

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19 *LG CHEM, LTD, and LG CHEM AMERICA, INC.*

*Attorneys for Plaintiffs Microsoft Mobile Inc.
and Microsoft Mobile Oy*

1
2 **ATTESTATION**

3 I, Mollie McGowan Lemberg, hereby attest, pursuant to Northern District of California Local
4 Rule 5-1(i)(3), that concurrence to the filing of this document has been obtained from each signatory
5 hereto.


6 Dated: November 6, 2015

7 By: /s/ Mollie McGowan Lemberg _____
8 Mollie McGowan Lemberg

9 IT IS SO ORDERED.

10 This Order terminates Dkt. No. 935 in the Master File and Dkt. No. 21 in Case No. 15-cv-03443.

11
12 Dated: November 9, 2015

13 
14 The Honorable Yvonne Gonzalez Rogers
15 UNITED STATES DISTRICT JUDGE