

1 SHEPPARD MULLIN RICHTER & HAMPTON LLP  
 A Limited Liability Partnership  
 2 Including Professional Corporations  
 GARY L. HALLING, Cal. Bar No. 66087  
 3 JAMES L. MCGINNIS, Cal. Bar No. 95788  
 MICHAEL W. SCARBOROUGH, Cal. Bar No. 203524  
 4 DYLAN I. BALLARD, Cal. Bar No. 253929  
 Four Embarcadero Center, 17<sup>th</sup> Floor  
 5 San Francisco, California 94111-4106  
 Telephone: 415-434-9100  
 6 Facsimile: 415-434-3947  
 E-mail: [ghalling@sheppardmullin.com](mailto:ghalling@sheppardmullin.com)  
 7 [jmcginnis@sheppardmullin.com](mailto:jmcginnis@sheppardmullin.com)  
[mscarborough@sheppardmullin.com](mailto:mscarborough@sheppardmullin.com)  
 8 [dballard@sheppardmullin.com](mailto:dballard@sheppardmullin.com)

9 Attorneys for Defendants  
 SAMSUNG SDI AMERICA, INC.,  
 10 SAMSUNG SDI CO., LTD.,  
 SAMSUNG SDI (MALAYSIA) SDN. BHD.,  
 11 SAMSUNG SDI MEXICO S.A. DE C.V.,  
 SAMSUNG SDI BRASIL LTDA.,  
 12 SHENZEN SAMSUNG SDI CO., LTD. and  
 TIANJIN SAMSUNG SDI CO., LTD.  
 13

14 UNITED STATES DISTRICT COURT  
 15 NORTHERN DISTRICT OF CALIFORNIA  
 16 SAN FRANCISCO DIVISION  
 17

18 In re: CATHODE RAY TUBE (CRT)  
 19 ANTITRUST LITIGATION

Case No. 07-5944 SC

MDL No. 1917

21 This Document Relates to:

22 INTERBOND ACTION

23 Individual Case No. 3:11-cv-06275-SC  
 24

**STIPULATION AND ~~PROPOSED~~  
 ORDER REGARDING INTERBOND  
 DISCOVERY TO OCCUR AFTER  
 SEPTEMBER 5, 2014**

1           The undersigned Defendants (collectively, “Defendants”) and Plaintiff Interbond  
2 Corporation of America (“Interbond”) have conferred by and through their counsel and, subject to  
3 the Court’s approval, HEREBY STIPULATE AS FOLLOWS:

4           WHEREAS, September 5, 2014 is the deadline to complete fact discovery in the  
5 Interbond action; and

6           WHEREAS, in the interest of conducting discovery in an efficient and streamlined  
7 manner and avoiding the taking of unnecessary depositions, the parties have agreed not to proceed  
8 at this time with depositions of Interbond employees who are uncertain or unlikely to be called by  
9 Interbond as a witness at trial; and

10           WHEREAS, Interbond reserves its rights to call such employees or any other  
11 individuals as trial witnesses; and

12           WHEREAS, Interbond and Defendants have conferred and agreed that, to the  
13 extent Interbond identifies any individuals on its pretrial witness list whom have not been deposed  
14 in this litigation, Defendants may depose those individuals before trial; and

15           WHEREAS, Interbond and Defendants agree to negotiate and cooperate in good  
16 faith with respect to the scheduling and conduct of any depositions that may occur after September  
17 5, 2014 pursuant to this stipulation, consistent with the Court’s Discovery Protocol (Dkt. No.  
18 1128); and

19           WHEREAS, Defendants and Interbond have conferred and agree that Interbond  
20 may make a production of documents after the September 5, 2014 close of fact discovery, but no  
21 later than September 12, 2014; and

22           WHEREAS, Defendants will therefore be unable to review and evaluate those  
23 documents before the close of fact discovery;

24           NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED between  
25 counsel for the undersigned parties as follows:

26           1.       To the extent Interbond identifies on its pretrial witness list any current or  
27 former employee, or any other person within its power to produce as a witness, who has not  
28 previously been deposed in this case, Defendants may notice and take the deposition of any such

1 individual before trial. However, Defendants may not seek to depose Interbond employee Lary  
2 Sinewitz in his individual capacity, who has previously appeared at deposition in this litigation  
3 pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure.

4           2. Interbond will complete its outstanding document production no later than  
5 September 12, 2014. To the extent Defendants wish to file a motion to compel with respect to that  
6 production, they will do so no later than September 19, 2014.

7           The undersigned parties respectfully request that this stipulation be entered as an  
8 Order of the Court.

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10 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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13 Dated: 09/05/2014

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1 Dated: September 3, 2014

By:  /s/ Dylan I. Ballard

2 SHEPPARD MULLIN RICHTER & HAMPTON  
3 LLP

4 Gary L. Halling, Cal. Bar No. 66087

5 James L. McGinnis, Cal. Bar No. 95788

6 Michael W. Scarborough, Cal. Bar No. 203524

7 Dylan I. Ballard, Cal. Bar No. 253929

8 Four Embarcadero Center, 17th Floor

9 San Francisco, CA 94111-4109

10 Telephone: (415) 434-9100

11 Facsimile: (415) 434-3947

12 E-mail: [ghalling@sheppardmullin.com](mailto:ghalling@sheppardmullin.com)

[jmcginnis@sheppardmullin.com](mailto:jmcginnis@sheppardmullin.com)

[mscarborough@sheppardmullin.com](mailto:mscarborough@sheppardmullin.com)

[dballard@sheppardmullin.com](mailto:dballard@sheppardmullin.com)

13 *Attorneys for Defendants Samsung SDI America,*  
14 *Inc.; Samsung SDI Co., Ltd.; Samsung SDI*  
15 *(Malaysia) SDN. BHD.; Samsung SDI Mexico S.A.*  
16 *DE C.V.; Samsung SDI Brasil Ltda.; Shenzhen*  
17 *Samsung SDI Co., Ltd. and Tianjin Samsung SDI*  
18 *Co., Ltd.*

19 By:  /s/ Philip J. Iovieno

20 BOIES, SCHILLER & FLEXNER LLP

21 Philip J. Iovieno (*pro hac vice*)

22 Anne M. Nardacci (*pro hac vice*)

23 30 South Pearl Street, 11th Floor

24 Albany, NY 12207

25 Telephone: (518) 434-0600

26 Facsimile: (518) 434-0665

27 Email: [piovieno@bsflp.com](mailto:piovieno@bsflp.com)

[anardacci@bsflp.com](mailto:anardacci@bsflp.com)

28 *Attorneys for Plaintiff Interbond Corporation of*  
*America*

By:  /s/ Jeffrey L. Kessler

WINSTON & STRAWN LLP

Jeffrey L. Kessler (*pro hac vice*)

A. Paul Victor (*pro hac vice*)

Aldo A. Badini Cal. Bar No. 257086

Eva W. Cole (*pro hac vice*)

Molly M. Donovan (*pro hac vice*)

200 Park Avenue

New York, NY 10166

Telephone: (212) 294-4692

Facsimile: (212) 294-4700

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Email: jkessler@winston.com  
abadini@winston.com  
pvictor@winston.com  
ewcole@winston.com  
mmdonovan@winston.com

WEIL, GOTSHAL & MANGES LLP

Steven A. Reiss (*pro hac vice*)  
David L. Yohai (*pro hac vice*)  
Adam C. Hemlock (*pro hac vice*)  
767 Fifth Avenue  
New York, NY 10153-0119  
Telephone: (212) 310-8000  
Facsimile: (212) 310-8007  
Email: steven.reiss@weil.com  
david.yohai@weil.com  
adam.hemlock@weil.com

*Attorneys for Defendants Panasonic Corporation  
(f/k/a Matsushita Electric Industrial Co., Ltd.),  
Panasonic Corporation of North America, and MT  
Picture Display Co., Ltd.*

By: /s/ Jon V. Swenson  
BAKER BOTTS LLP  
Jon V. Swenson (SBN 233054)  
1001 Page Mill Road  
Building One, Suite 200  
Palo Alto, CA 94304  
Telephone: (650) 739-7500  
Facsimile: (650) 739-7699  
Email: jon.swenson@bakerbotts.com

John M. Taladay (*pro hac vice*)  
Joseph Ostoyich (*pro hac vice*)  
Erik T. Koons (*pro hac vice*)  
Charles M. Malaise (*pro hac vice*)  
1299 Pennsylvania Ave., N.W.  
Washington, DC 20004-2400  
Telephone: (202) 639-7700  
Facsimile: (202) 639-7890  
Email: john.taladay@bakerbotts.com  
joseph.ostoyich@bakerbotts.com  
erik.koons@bakerbotts.com  
charles.malaise@bakerbotts.com

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*Attorneys for Defendants Koninklijke Philips N.V.  
and Philips Electronics North America Corporation*

By: /s/ Richard Snyder  
FRESHFIELDS BRUCKHAUS  
DERINGER US LLP  
Terry Calvani Cal. Bar. No. 53260  
Christine Laciak (*pro hac vice*)  
Richard Snyder (*pro hac vice*)  
701 Pennsylvania Avenue NW, Suite 600  
Washington, D.C. 20004  
Telephone: (202) 777-4565  
Facsimile: (202) 777-4555  
Email: terry.calvani@freshfields.com  
christine.laciak@freshfields.com  
richard.snyder@freshfields.com

*Attorneys for Beijing-Matsushita Color CRT  
Company, Ltd.*

By: /s/ Eliot A. Adelson  
KIRKLAND & ELLIS LLP  
Eliot A. Adelson Cal. Bar. No. 205284  
555 California Street, 27th Floor  
San Francisco, CA 94104  
Telephone: (415) 439-1413  
Facsimile: (415) 439-1500  
Email: eadelson@kirkland.com

*Attorneys for Defendants Hitachi, Ltd., Hitachi  
Displays, Ltd. (n/k/a Japan Display East, Inc.),  
Hitachi Asia, Ltd., Hitachi America, Ltd., and Hitachi  
Electronic Devices (USA), Inc.*

By: /s/ Lucius B. Lau  
WHITE & CASE LLP  
Christopher M. Curran (*pro hac vice*)  
George L. Paul (*pro hac vice*)  
Lucius B. Lau (*pro hac vice*)  
701 Thirteenth Street, N.W.  
Washington, D.C. 20005  
Telephone: (202) 626-3600  
Facsimile: (202) 639-9355  
Email: ccurran@whitecase.com  
gpaul@whitecase.com  
alau@whitecase.com

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*Attorneys for Defendants Toshiba Corporation, Toshiba America, Inc., Toshiba America Information Systems, Inc., Toshiba America Consumer Products, L.L.C., and Toshiba America Electronic Components, Inc.*

By: /s/ Rachel S. Brass  
GIBSON, DUNN & CRUTCHER LLP  
Rachel S. Brass Cal. Bar. No. 219301  
Joel S. Sanders Cal. Bar. No. 107234  
Austin V. Schwing Cal. Bar. No. 211696  
555 Mission Street, Suite 3000  
San Francisco, CA 94105  
Telephone: (415) 393-8200  
Facsimile: (415) 393-8306  
Email: rbrass@gibsondunn.com  
jsanders@gibsondunn.com  
aschwing@gibsondunn.com

*Attorneys for Defendants Chunghwa Picture Tubes, Ltd. and Chunghwa Picture Tubes (Malaysia)*

By: /s/ Hojoon Hwang  
MUNGER, TOLLES & OLSON LLP  
Hojoon Hwang, Cal. Bar. No. 184950  
William D. Temko, Cal. Bar. No. 98858  
Laura K. Lin, Cal. Bar. No. 281542  
560 Mission Street  
Twenty-Seventh Floor  
San Francisco, California 94105-2907  
Telephone: (415) 512-4000  
Facsimile: (415) 512-4077

*Attorneys For Defendants LG Electronics, Inc. and LG Electronics U.S.A., Inc.*

By: /s/ Kathy L. Osborn  
FAEGRE BAKER DANIELS LLP  
Kathy L. Osborn (*pro hac vice*)  
Ryan M. Hurley (*pro hac vice*)  
300 N. Meridian Street, Suite 2700  
Indianapolis, IN 46204  
Telephone: (317) 237-0300  
Facsimile: (317) 237-1000  
kathy.osborn@FaegreBD.com  
ryan.hurley@FaegreBD.com

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Calvin L. Litsey (SBN 289659)  
Faegre Baker Daniels LLP  
1950 University Avenue, Suite 450  
East Palo Alto, CA 94303-2279  
Telephone: (650) 324-6700  
Facsimile: (650) 324-6701  
[calvin.litsey@FaegreBD.com](mailto:calvin.litsey@FaegreBD.com)

*Attorneys for Defendants Thomson SA and  
Thomson Consumer Electronics, Inc.*

By: /s/ Michael T. Brody  
JENNER&BLOCK LLP  
Terrence J. Truax (*pro hac vice*)  
Michael T. Brody (*pro hac vice*)  
353 North Clark Street  
Chicago, Illinois 60654-3456  
Telephone: (312) 222-9350  
Facsimile: (312) 527-0484  
[ttruax@jenner.com](mailto:ttruax@jenner.com)  
[mbrody@jenner.com](mailto:mbrody@jenner.com)

Brent Caslin (Cal. Bar. No. 198682)  
JENNER&BLOCK LLP  
633 West Fifth Street, Suite 3600  
Los Angeles, California 90071  
Telephone: (213) 239-5100  
Facsimile: (213) 239-5199  
[bcaslin@jenner.com](mailto:bcaslin@jenner.com)

*Attorneys for Defendants Mitsubishi Electric  
Corporation, Mitsubishi Electric US, Inc.  
and, Mitsubishi Electric Visual Solutions  
America, Inc.*

Pursuant to Local Rule 5-1(i), the filer attests that the concurrence in the filing of  
this document has been obtained from each of the above signatories.