

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE: OPTICAL DISK DRIVE PRODUCTS  
ANTITRUST LITIGATION

Case No. 3:10 MD-02143 RS  
MDL No. 2143

THIS DOCUMENT RELATES TO:  
ALL INDIRECT-PURCHASER ACTIONS

Judge: Hon. Richard Seeborg

STIPULATION OF DISMISSAL WITH PREJUDICE

1. Pursuant to the settlement agreement entered into on <sup>June 14</sup> \_\_\_, 2016, by and between Hitachi-LG Data Storage, Inc. and Hitachi-LG Data Storage Korea, Inc. (collectively "HLDS" or "Settling Defendants") and the indirect purchaser plaintiffs' representatives ("Plaintiffs") (the "Settlement Agreement"), the indirect purchaser actions shall be dismissed with prejudice and without costs as to defendants LG Electronics, Inc. and LG Electronics USA, Inc. (collectively "LG Parties") upon the Settlement Agreement becoming final pursuant to Paragraph 12 thereof.

2. Pursuant to the Settlement Agreement, LG Parties agree as follows:

(a) LG Parties shall produce to Plaintiffs all discovery produced to any other party during the pendency of the Action.

(b) Nothing herein is intended to, or obligates LG Parties to, waive any privilege or immunity.

DATED: June 14, 2016

HAGENS BERMAN SOBOL SHAPIRO LLP

By   
JEFF D. FRIEDMAN

Shana E. Scarlett (217895)  
715 Hearst Avenue, Suite 202  
Berkeley, CA 94710  
Telephone: (510) 725-3000  
Facsimile: (510) 725-3001  
jefff@hbsslw.com  
shanas@hbsslw.com

Steve W. Berman (*Pro Hac Vice*)  
HAGENS BERMAN SOBOL SHAPIRO LLP  
1918 Eighth Avenue, Suite 3300  
Seattle, WA 98101  
Telephone: (206) 623-7292  
Facsimile: (206) 623-0594  
steve@hbsslw.com

*Lead Counsel for Indirect  
Purchaser Settlement Class*

DATED: June 14, 2016

EIMER STAHL LLP

By   
NATHAN P. EIMER

Nathan P. Eimer  
Vanessa G. Jacobsen  
Arin C. Aragona  
224 S. Michigan Avenue, Suite 1100  
Chicago, IL 60604  
Telephone: (312) 660-7600  
Facsimile: (312) 692-1718  
aklafeta@eimerstahl.com  
neimer@eimerstahl.com  
vjacobsen@eimerstahl.com  
aaragona@eimerstahl.com

*Counsel for LG Electronics, Inc.*