

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 July 14 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 defendant Hitachi, Ltd. ("Hitachi") upon the Settlement Agreement becoming final pursuant to Paragraph 12 thereof.

2. Pursuant to the Settlement Agreement, Hitachi agrees as follows:

(a) Hitachi 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 Hitachi to, waive any privilege or immunity.

DATED: June 23, 2016

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