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May 10, 2010

Hon. Charles A. Legge
 JAMS
 Two Embarcadero Center, Suite 1500
 San Francisco, CA 94111

RE: *In re Cathode Ray Tube (CRT) Litigation*, No. 07-5944 SC, MDL No. 1917

Dear Judge Legge:

Pursuant to Your Honor's Notice dated April 12, 2010, we write on behalf of defendants regarding an agenda for the Case Management Conference scheduled for May 13, 2010. Consistent with Judge Conti's directive to "streamline and efficiently manage discovery in this case," Defendants respectfully request that the following items be addressed at the Case Management Conference:

1. Early resolution of the temporal scope of discovery and statute of limitations issues, including early discovery from plaintiffs regarding their claim of fraudulent concealment.
2. Resolution of the scope of discovery as regards finished CRT products as opposed to CRTs.

In addition, pursuant to Your Honor's request, below is a list of discovery served thus far with deadlines for written objections and responses.

1. Discovery Served on Direct Purchaser Plaintiffs

| Discovery Request | Date Due |
|--|-----------------|
| LGE's First Set of Requests for Production | 5/7/2010 |
| LGE's First Set of Interrogatories | 5/7/2010 |
| First Set of Interrogatories of Defendant MT Picture Display Co., Ltd. | 5/7/2010 |
| First Set of Document Requests of Defendant MT Picture Display Co., Ltd. | 5/7/2010 |
| Defendant Hitachi Displays, Ltd.'s First Set of Document Requests | 5/7/2010 |

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| Defendant Hitachi Displays, Ltd.'s First Set of Interrogatories | 5/7/2010 |
| LGE's Second Set of Requests for Production | 6/7/2010 |
| Defendant Hitachi America, Ltd.'s First Set of Interrogatories | 6/7/2010 |
| Defendant Hitachi America, Ltd.'s First Set of Requests for Production of Documents | 6/7/2010 |
| Samsung SDI Co. Ltd.'s First Set of Requests for Production of Documents | 6/7/2010 |
| Samsung SDI Co., Ltd.'s First Set of Interrogatories | 6/7/2010 |
| Samsung Electronics America, Inc.'s First Set of Interrogatories | 6/7/2010 |
| Samsung Electronics America, Inc.'s First Set of Requests for Production of Documents | 6/7/2010 |
| Defendant Panasonic Corporation's First Set of Interrogatories to Direct Purchaser Plaintiffs | 6/7/2010 |
| Defendant Panasonic Corporation's First Set of Requests for Production of Documents | 6/7/2010 |

2. Discovery Served on Indirect Purchaser Plaintiffs

| Discovery Request | Date Due |
|---|-----------------|
| Samsung SDI America, Inc.'s First Set of Interrogatories | 5/7/2010 |
| Samsung SDI America, Inc.'s First Set of Requests for Production of Documents | 5/7/2010 |
| First Set of Interrogatories of Samsung Electronics America, Inc. | 5/7/2010 |
| First Set of Document Requests of Samsung Electronics America, Inc. | 5/7/2010 |
| Defendant Hitachi Displays, Ltd.'s First Set of Document Requests | 5/7/2010 |
| Defendant Hitachi Displays, Ltd.'s First Set of Interrogatories | 5/7/2010 |
| Samsung SDI Co., Ltd.'s First Set of Interrogatories | 6/7/2010 |
| Samsung SDI Co., Ltd.'s First Set of Requests for Production of Documents | 6/7/2010 |
| Toshiba America Information Systems, Inc.'s First Set of Interrogatories | 6/7/2010 |
| Toshiba America Information Systems, Inc.'s First Set of Requests for Production of Documents | 6/7/2010 |

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3. Discovery Served on Defendants

| Discovery Request | Date Due |
|---|-----------------|
| Direct Purchaser Plaintiffs' First Set of Requests for Production of Documents to All Defendants | 5/12/2010 |
| Direct Purchaser Plaintiffs' Second Set of Requests for Production of Documents to All Defendants | 5/12/2010 |
| Direct Purchaser Plaintiffs' First Set of Interrogatories to All Defendants | 5/12/2010 |
| First Set of Requests for Admission from LEG Electronics USA, Inc., to Chunghwa Picture Tubes, Ltd. | 5/14/2010 |
| Indirect Purchaser Plaintiffs' First Request for Production of Documents from All Defendants | 5/28/2010 |
| Indirect Purchaser Plaintiffs' Second Request for Production of Documents from All Defendants | 5/28/2010 |

Finally, we would like to discuss the division of JAMS expenses among defendants in view of the apparent non-participation by some defendants in the case.

Respectfully submitted,

s/ Jeffrey L. Kessler

Jeffrey L. Kessler

cc: All Counsel via ECF