IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

LG ELECTRONICS U.S.A., INC., and LG ELECTRONICS, INC., & Plaintiffs, v. WHIRLPOOL CORPORATION, Defendant.	C.A. No. 08-234-GMS Jury Trial Demanded
WHIRLPOOL CORPORATION, WHIRLPOOL PATENTS COMPANY, WHIRLPOOL MANUFACTURING CORPORATION, and MAYTAG CORPORATION, Counterclaim Plaintiffs, v. LG ELECTRONICS U.S.A., INC., LG ELECTRONICS, INC., and LG ELECTRONICS MONTERREY MEXICO, S.A. DE CV, Counterclaim Defendants.	

PLAINTIFFS' MOTION TO STAY CERTAIN ISSUES PURSUANT TO 28 U.S.C. § 1659

For the reasons set forth in its supporting memorandum, pursuant to 28 U.S.C. § 1659, Plaintiffs and Counterclaim Defendants, LG Electronics, USA, Inc. and LG Electronics, Inc.; and Counterclaim Defendant, LG Electronics Monterrey Mexico, S.A. de C.V. (collectively "LG"), hereby move to stay all proceedings pertaining to Whirlpool's allegations of infringement of United States Patent Nos. 6,810,680 (the " '680 patent") and 6,915,644 (the " '644 patent"), including all claims, defenses, and requests for relief regarding the '680 and the '644 patents, in this case pending resolution of *In the Matter of Certain Refrigerators and Components Thereof*, Inv. No. 337-TA-632 (the "ITC Investigation"), now pending before the United States

International Trade Commission ("ITC"). LG respectfully submits that this is a mandatory, statutory stay which it has an absolute right to seek.

Although LG has this statutory right to seek a stay of all issues relating to each of the five patents asserted in the ITC case, LG has not included in this motion, a request to stay the issues relating to United States Patent No. 6,082,130 ("the '130 patent").

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