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.

WHIRLPOOL'S ANSWERING BRIEF BY REFERENCE IN OPPOSITION TO PLAINTIFFS' MOTION TO STAY SELECTED PATENTS PURSUANT TO 28 U.S.C. § 1659

Defendant and Counterclaim Plaintiff Whirlpool Corporation and Counterclaim Plaintiffs Whirlpool Patents Company, Whirlpool Manufacturing Corporation, and Maytag Corporation (collectively "Whirlpool") incorporate by reference, as if set forth herein in full, the arguments made by the Whirlpool Defendants in their Answering Brief In Opposition To Plaintiffs' Motion

To Stay filed in the related action, C.A. No. 08-332-UNA, as D.I. 28, and attached here as Exhibit A. Whirlpool does so for the purposes of judicial economy in light of the substantially similar motions filed in the related cases by the same Plaintiffs and with respect to the same patents.

For the reasons set forth in Defendants' Answering Brief In Opposition To Plaintiffs' Motion To Stay, Whirlpool respectfully requests the Court deny Plaintiffs' Motion To Stay all proceedings pertaining to United States Patent Nos. 6,810,680 ("the '680 patent") and 6,915,644 ("the '644 patent") or, in the alternative, should the Court determine that a stay is warranted, grant the stay also with respect to U.S. Patent No. 6,082,130 ("the '130 patent").

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Dated: June 5, 2008

CERTIFICATE OF SERVICE

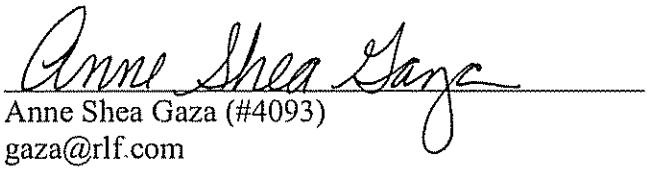
I hereby certify that on June 5, 2008, I electronically filed the foregoing document and the same with the Clerk of Court using CM/ECF which will send notification of such filing(s) to the following who have also been served as noted:

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