IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

LG ELECTRONICS, INC. and LG ELECTRONICS U.S.A., INC.,	)	
Plaintiffs,	)	
v.	)	C.A. No. 12-1063 -LPS-CJB
TOSHIBA SAMSUNG STORAGE TECHNOLOGY KOREA CORPORATION,	)	
Defendant.	)	

STIPULATION AND [PROPOSED] ORDER STAYING CASE AND VACATING ALL DEADLINES

WHEREAS, Plaintiffs LG Electronics, Inc. and LG Electronics U.S.A., Inc. ("LG") and Toshiba Samsung Storage Technology Korea Corporation ("TSST-K") have reached an agreement to stay this litigation and *TSST-K v. LG* (Case No. 15-691) pending final, non-appealable resolution of all *inter partes* review proceedings ("IPRs") currently pending or instituted on all of the patents-in-suit in both cases.[1]

WHEREAS, LG agrees to withdraw its Motion for Relief from Provisional Stay and Any Subsequent Stay, including Automatic Stay, currently pending in *In re Toshiba Samsung Storage Technology Korea Corporation* (Case No. 16-11602) in the United States Bankruptcy Court for the District of Delaware (D.I. 50).

IT IS THEREFORE STIPULATED AND AGREED by counsel for LG and TSST-K, and subject to the Court's approval, that in the event that the current stay in view of bankruptcy is lifted for any reason, then this case shall be stayed until the final, non-appealable resolution of all

[1] The currently pending IPRs are: IPR2015-01642, IPR2015-01644, IPR2015-01653, IPR2015-01659, IPR2016-01677, and IPR2016-01678. Any IPR filed subsequent to the initial filing of this Stipulation shall have no bearing on the requested stay.

currently pending IPRs on the patents-in-suit in this litigation and *TSST-K v. LG* (Case No. 15-691)[2].

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Attorneys for Defendant Toshiba Samsung Storage Technology Korea Corporation

IT IS SO ORDERED, this _____ day of _____, 2016.

_____
UNITED STATES DISTRICT JUDGE

[2] The parties agree and hereby stipulate that either party may refile this Stipulation at any time prior to the final, non-appealable resolution of the currently pending IPRs.