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20 *Samsung Electronics Co., Ltd. and Samsung Semiconductor, Inc.*

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

MARC GARCIAGUIRRE, et al.,

Plaintiffs,

v.

SAMSUNG ELECTRONICS CO., LTD., et al.,

Defendants.

Case No. 5:26-cv-06345-NW

**STIPULATION RE EXTENSION OF
TIME TO RESPOND TO
PLAINTIFFS' COMPLAINT**

1 Pursuant to Civil Local Rule 6-1(a), Plaintiffs and Defendants Samsung Electronics Co., Ltd.
2 (“SEC”), Samsung Semiconductor, Inc. (“SSI”), Micron Technology, Inc. (“Micron”), SK hynix Inc.
3 (“SKh”), and SK hynix America Inc. (“SKhA”) (collectively, the “Defendants”) hereby stipulate as
4 follows:

5 WHEREAS, Plaintiffs filed a complaint in the above-captioned action on June 25, 2026, (the
6 “Complaint”);

7 WHEREAS, Defendant SSI was served with process on or about June 30, 2026;

8 WHEREAS, Defendant SEC is a Korean corporation, and Plaintiffs purported to serve SEC
9 via service on SSI on June 30, 2026;

10 WHEREAS, Defendant SEC does not agree that Plaintiffs’ service via Defendant SSI
11 properly effected service on Defendant SEC;

12 WHEREAS, upon the filing of this Stipulation, Defendant SEC shall agree to waive service
13 of process pursuant to Federal Rule of Civil Procedure 4(d);

14 WHEREAS, Defendant Micron Technology was served with process on or about July 6,
15 2026;

16 WHEREAS, Defendant SKhA was served with process on or about June 30, 2026;

17 WHEREAS, Defendant SKh is a Korean corporation, and Plaintiffs purported to serve SKh
18 via service on SKhA on June 30, 2026;

19 WHEREAS, Defendant SKh does not agree that Plaintiffs’ service via Defendant SKhA
20 properly effected service on Defendant SKh;

21 WHEREAS, upon the filing of this Stipulation, Defendant SKh shall agree to waive service
22 of process pursuant to Federal Rule of Civil Procedure 4(d);

23 WHEREAS, Plaintiffs and Defendants have conferred and agreed to extend the deadline by
24 which Defendants shall respond to the Complaint, pursuant to Local Rule 6-1(a);

1 **IT IS HEREBY STIPULATED AND AGREED**, by and between Plaintiffs and
2 Defendants, as follows:

3 Pursuant to Local Rule 6-1(a), Defendants shall not be required to file any motion(s) to
4 dismiss or otherwise respond to the Complaint until September 2, 2026.

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6 Dated: July 14, 2026

Respectfully submitted,

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8 By: /s/ Diana A. Aguilar Aldape

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Counsel for Plaintiffs and the Proposed Classes

ATTESTATION OF CONCURRENCE IN FILING

Pursuant to Civil Local Rule 5-1(i)(3), the filer attests that concurrence in the filing of this document has been obtained from each of the signatories. These records will be retained in the filer's records until one (1) year after the final resolution of the action.

/s/ Sara N. Pahlavan

Sara N. Pahlavan