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9
10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA)

14 v.)

15 THOMAS QUINN,)

16 Defendant.)

Case No. 06-0635 SI

STIPULATED NOTICE
OF RELATED CASE
IN A CRIMINAL ACTION;
and [PROPOSED] ORDER

17 UNITED STATES OF AMERICA)

18 v.)

19 SUN WOO LEE; YEONGHO KANG; and)
20 YOUNG WOO LEE,)

21 Defendants.)

Case No. CR 06-0180 PJH

22 UNITED STATES OF AMERICA)

23 v.)

24 D.S. KIM, C.K. CHUNG, K.C. SUH, and)
25 C.Y. CHOI,)

26 Defendants.)

Case No. CR 06-126 PJH

27
28 [CAPTION CONTINUES ON NEXT PAGE]

1 UNITED STATES OF AMERICA)

2 v.)

3 ELPIDA MEMORY, INC.,)

4 Defendant.)

Case No. CR 06-0059 PJH

5 _____)
6 UNITED STATES OF AMERICA)

7 v.)

8 SAMSUNG ELECTRONICS COMPANY,
9 LIMITED and SAMSUNG SEMICONDUCTOR,
10 INC.,)

11 Defendants.)

Case No. CR 05-643 PJH

12 UNITED STATES OF AMERICA)

13 v.)

14 HYNIX SEMICONDUCTOR INC.,)

15 Defendant.)

Case No. CR 05-249 PJH

16 UNITED STATES OF AMERICA)

17 v.)

18 INFINEON TECHNOLOGIES AG,
19)

20 Defendant.)

Case No. CR 04-299 PJH

21 UNITED STATES OF AMERICA)

22 v.)

23 T. RUDD CORWIN; HEINRICH FLORIAN;
24 GÜNTER HEFNER; and PETER SCHAEFER,)

25 Defendants.)

Case No. CR 04-397 PJH

26 Under Crim. L. R. 8-1, the United States and Thomas Quinn (“Defendant”), file this
27 Stipulated Notice of Related Case in a Criminal Action for this criminal case, United States v.
28

1 Thomas Quinn, CR 06-635 (SI) to seven previously filed criminal cases assigned to Judge
2 Phyllis J. Hamilton, United States v. Sun Woo Lee, et al., CR 06-180 (PJH), United States v.
3 D.S. Kim, et al., CR 06-126 (PJH), United States v. Elpida Memory, CR 06-0059 (PJH),
4 United States v. Samsung Electronics Company, Limited and Samsung Semiconductor, Inc., CR
5 05-643 (PJH), United States v. Hynix Semiconductor Inc., CR 05-249 (PJH), United States v.
6 Infineon Technologies AG, CR 04-299 (PJH), and United States v. T. Rudd Corwin, et al., CR
7 04-397 (PJH). The United States and Defendant jointly request relating this case to Judge
8 Hamilton.

9 A chronological history of these related criminal cases follows. On September 15, 2004,
10 the United States filed an Information in United States v. Infineon Technologies AG, charging
11 Infineon with participating in a conspiracy to fix the prices of DRAM sold to certain computer
12 manufacturers. On October 20, 2004, Infineon pled guilty for participating in the price-fixing
13 conspiracy and was sentenced to pay a \$160 million fine before Judge Hamilton. On December
14 2, 2004, the United States filed an Information in United States v. T. Rudd Corwin, et al.,
15 charging four individual defendants with participating in the same price-fixing conspiracy in the
16 DRAM industry. On December 15, 2004, Judge Hamilton sentenced each of the four
17 individuals. On April 21, 2005, the United States filed an Information in United States v. Hynix
18 Semiconductor Inc., charging Hynix with participating in the DRAM price-fixing conspiracy.
19 On May 11, 2005, Hynix pled guilty for participating in the price-fixing conspiracy and was
20 sentenced by Judge Hamilton to pay a \$185 million fine. On October 13, 2005, the United
21 States filed an Information in United States v. Samsung Electronics Company, Limited and
22 Samsung Semiconductor, Inc., charging Samsung with participating in the DRAM price-fixing
23 conspiracy. On November 30, 2005, Samsung pled guilty for participating in the price-fixing
24 conspiracy and was sentenced by Judge Hamilton to pay a \$300 million fine. On January 30,
25 2006, the United States filed an Information in United States v. Elpida Memory, Inc., charging
26 Elpida with participating in the DRAM price-fixing conspiracy. On March 22, 2006, Elpida
27 pled guilty for participating in the DRAM price-fixing conspiracy and was sentenced by Judge
28

1 Hamilton to pay an \$84 million fine. On March 1, 2006, the United States filed an Information
2 in United States v. D.S. Kim et al., charging four individual defendants with participating in the
3 DRAM price-fixing conspiracy. On March 15, 2006, Judge Hamilton sentenced each of the
4 four individuals. Finally, on March 22, 2006, the United States filed an Information in United
5 States v. Sun Woo Lee, et al., charging three individual defendants with participating in the
6 DRAM price-fixing conspiracy. On April 2, 2007, Judge Hamilton sentenced two of the three
7 individuals, Sun Woo Lee and Yeongho Kang. On August 30, Judge Hamilton sentenced the
8 third individual, Young Woo Lee.

9 The Information charges that Defendant participated in the DRAM price-fixing
10 conspiracy. There are common events and occurrences alleged in this case and the seven
11 predecessor cases pending before Judge Hamilton.

12 The assignment of this case to Judge Hamilton is therefore likely to conserve judicial
13 resources and to promote an efficient determination of the action.

14 Dated: October 6, 2006

15 Respectfully submitted,

16 THOMAS QUINN

U.S. DEPARTMENT OF JUSTICE

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