1 2	NIALL E. LYNCH (State Bar No. 157959) NATHANAEL M. COUSINS (State Bar No. 177944) MAY Y. LEE (State Bar No. 209366)		Filed 8/22/2006
3	BRIGID S. BIÈRMANN (State Bar No. 231705) CHARLES P. REICHMANN (State bar No. 2060		
4	Antitrust Division U.S. Department of Justice	,	
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7	Attorneys for the United States		
8	UNITED STATES DISTRICT COURT		
9	NORTHERN DISTRICT OF CALIFORNIA		
10	SAN FRANCISCO DIVISION		
11	SANTRANCISCO DIVISION		
12	UNITED STATES OF AMERICA	)	Case No. CR 06-0180 (PJH)
13	v.	<u> </u>	STIPULATION AND [PROPOSED] ORDER FOR EXPEDITED
14	v.	)	SENTENCING UNDER L.R. 32-1(b)
15	SUN WOO LEE, YEONGHO KANG, and		
16	YOUNG WOO LEE, TEONOTIO RANG, and YOUNG WOO LEE,	(	DATE: August 30, 2006
17	Defendants.		TIME: 2:30 p.m. COURT: Hon. Phyllis J. Hamilton
18		/	COOKI. Hon. Hyms J. Hammton
19	On March 22, 2006, the United States filed an Information charging Young Woo Lee with		
20	participating in a conspiracy in the United States and elsewhere to suppress and eliminate		
21	competition by fixing the prices of DRAM to be sold to certain OEM customers during various		
22	periods of time from June 1, 2001, until June 15, 2002, in violation of the Sherman Antitrust Act,		
23	15 U.S.C. § 1. Young Woo Lee (the "Defendant") is scheduled for a change of plea and possible		
24	sentencing on August 30, 2006. Defendant has agreed to waive Indictment and plead guilty under		
25	Fed. R. Crim. P. 11(c)(1)(C). The United States and Defendant will file the Plea Agreement and a		
26	Joint Sentencing Memorandum describing the material terms of the Plea Agreement and the		
27	agreed upon sentencing recommendation.		
28	Stip. for Expedited Sentencing CR 06-180 PJH		

## IT IS HEREBY STIPULATED AND AGREED as follows: 1 2 The United States and Defendant request that the Court sentence Defendant on an 3 expedited basis pursuant to Crim. L.R. 32-1(b), on August 30, 2006. The United States and Defendant respectfully submit that the Joint Sentencing Memorandum and the Plea Agreement 4 5 provide sufficient information for the Court to impose a sentence on August 30, 2006, the same date as the change of plea hearing, without a presentence report. 6 7 DATED: August 22, 2006 8 Respectfully submitted, 9 10 YOUNG WOO LEE U.S. DEPARTMENT OF JUSTICE 11 /s/ by BK BY: 12 Steven G. Madison Niall E. Lynch, CA No. 157959 Quinn Emanuel Nathanael M. Cousins, CA No. 177944 13 865 S. Figueroa Street May Y. Lee, CA No. 209366 Brigid S. Biermann, CA No. 231705 10<sup>th</sup> Floor 14 Los Angeles, CA 90017 Charles P. Reichmann, CA No. 206699 15 Tel: (213) 443-3000 **Trial Attorneys** U.S. Department of Justice Fax: (213) 16 Antitrust Division 450 Golden Gate Avenue 17 Box 36046, Room 10-0101 San Francisco, CA 94102 18 Tel: (415) 436-6660 Fax: (415) 436-6687 19 20 21 22 23 24 25 26 27 28

Stip. for Expedited Sentencing CR 06-180 PJH