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15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

18 UNITED STATES OF AMERICA

19 v.

20 AU OPTRONICS CORPORATION;
21 AU OPTRONICS CORPORATION AMERICA;
22 HSUAN BIN CHEN, aka H.B. CHEN;
23 HUI HSIUNG, aka KUMA;
24 LAI-JUH CHEN, aka L.J. CHEN;
25 SHIU LUNG LEUNG, aka CHAO-LUNG
26 LIANG and STEVEN LEUNG;
27 BORLONG BAI, aka RICHARD BAI;
28 TSANNRONG LEE, aka TSAN-JUNG LEE and
HUBERT LEE;
CHENG YUAN LIN, aka C.Y. LIN;
WEN JUN CHENG, aka TONY CHENG; and
DUK MO KOO,

Defendants.

No. CR-09-0110 SI

DECLARATION OF HEATHER S.
TEWKSBURY IN SUPPORT OF
UNITED STATES' REPLY TO
DEFENDANTS' SENTENCING
MEMORANDA

Date: September 20, 2012
Time: 10:00 a.m.
Court: Hon. Susan Illston
Place: Courtroom 10, 19th Floor

1 I, Heather S. Tewksbury, hereby declare as follows:

2 1. I am an attorney in the United States Department of Justice, Antitrust Division in
3 San Francisco and am admitted to practice before this Court. I have personal knowledge of the
4 matters set forth herein and, if called as a witness, could and would testify competently thereto.

5 2. Attached hereto as Exhibit A is a true copy of the transcript of proceedings before
6 the Honorable Ruben Castillo in *United States v. Archer Daniels Midland Company*, Case No.
7 96 CR 640, on October 15, 1996.

8 3. Attached hereto as Exhibit B is a true copy of relevant excerpts of the expert
9 report of Dr. Mohan Rao, prepared and disclosed in related TFT-LCD civil litigation.

10 4. Attached hereto as Exhibit C is a true copy of relevant excerpts of the reply expert
11 report of Dr. Mohan Rao, prepared and disclosed in related TFT-LCD civil litigation.

12 5. Attached hereto as Exhibit D is a true copy of relevant excerpts of the deposition
13 of Dr. Mohan Rao, taken in related TFT-LCD civil litigation.

14 6. Attached hereto as Exhibit E is a true copy of relevant excerpts of the deposition
15 of Paul Peng, taken in related TFT-LCD civil litigation. **[FILED UNDER SEAL]**

16 I declare under penalty of perjury under the laws of the United States that the foregoing is
17 true and correct to the best of my knowledge.

18
19 Executed this 17th day of September, 2012 at San Francisco, California.

20
21 /s/ Heather S. Tewksbury
22 Heather S. Tewksbury