

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

Motorola Mobility, Inc.	)	No. 1:09-cv-06610
	)	
v.	)	Hon. Joan B. Gottschall, J.
	)	
AU Optronics Corporation, et al.	)	

**MOTION FOR RECONSIDERATION**

Defendants hereby move for reconsideration of the MDL court's summary judgment ruling permitting Motorola to pursue U.S. antitrust claims based on purchases of LCD panels by its foreign subsidiaries. Those claims relate to sales to foreign corporations of goods that were manufactured, delivered, and paid for overseas, pursuant to purchase orders issued abroad and referencing foreign law. The governing statute, the Foreign Trade Antitrust Improvements Act, does not permit extraterritorial application of U.S. antitrust law to such manifestly foreign claims, as both the Supreme Court and Seventh Circuit have held.

Defendants therefore respectfully request that this Court dismiss Motorola's claims based on overseas purchases by its foreign subsidiaries. A supporting memorandum and volume of supporting exhibits are filed concurrently with this motion.

September 20, 2013

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I, Jeffrey M. Davidson, an attorney, do hereby certify that I caused a copy of the foregoing motion and the accompanying memorandum of law, declaration, and volume of exhibits to be electronically filed with the Court and served on all parties on September 20, 2013 using the Court's electronic case filing system.

By: /s/ Jeffrey M. Davidson  
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