

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

THOMAS J. PETTERS, ET AL.,

*Defendants.*

Case No.: 08-5348 (ADM/JSM)

**LG ELECTRONICS, INC.’S EXPEDITED MOTION TO INTERVENE**

LG Electronics, Inc. (“LGE”) moves this Court for expedited consideration for leave to intervene for the limited purpose of seeking amendment of the “Stay of Actions Against Receivership Defendants” (“Stay”) that this Court ordered in its “Amended Order for Entry of Preliminary Injunction, Appointment of Receiver, and Other Equitable Relief” entered on October 22, 2008.

On October 27, 2008, this Court’s appointed Receiver, Mr. Douglas A. Kelley, filed a “Notice of Order Staying Civil Litigation” (“Notice”) in *LG Electronics, Inc. v. Petters Group Worldwide LLC*, No. 08-cv-00163, currently pending in the United States District Court for the Eastern District of Texas. The Notice alleges that the Stay enjoins all pending and future litigation against Polaroid Corporation (“Polaroid”). LGE respectfully requests relief from the Stay to proceed in its lawsuit against Polaroid.

LGE requests the Court give its Motion expedited consideration, based upon exigent circumstances, *i.e.*, the Receiver’s Notice purports to relieve a defendant from serving its Answer, which would otherwise be due December 11, 2008. Absent prompt

action from this Court, the Receiver's Notice will derail the orderly case management of the co-pending case in the Eastern District of Texas.

LGE has submitted an accompanying Memorandum of Law in support of this Motion to Intervene, which establishes that (1) LGE claims an interest relating to the subject of this action, (2) LGE is so situated that disposing of this action will impair and impede LGE's ability to protect that interest, and (3) no existing party to this Court's action adequately represents LGE's interest. This Memorandum also supports the addition of LGE as a permissive intervenor because LGE's claim shares with this action a common question of law or fact. Finally, this motion is for a limited purpose and therefore will not cause undue delay or prejudice to the original parties.

WHEREFORE, LGE respectfully requests that the Court grant LGE's Motion to Intervene.

Dated: November 18, 2008

FISH & RICHARDSON P.C.

By: s/ John C. Adkisson

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