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Lead Counsel for the Proposed Class

14 UNITED STATES DISTRICT COURT
 15 NORTHERN DISTRICT OF CALIFORNIA

17 In re LDK SOLAR SECURITIES
LITIGATION

MASTER FILE NO. C-07-05182-WHA

**STIPULATION AND [PROPOSED] ORDER
 RESCHEDULING CLASS CERTIFICATION
 AND DAUBERT MOTION BRIEFING AND
 HEARING**

19 This Document Relates To:
 20 ALL ACTIONS.

[Civil L.R. 6-2(a)]

1 WHEREAS, the parties have, in good faith, met and conferred regarding the
2 current briefing and hearing schedule on Plaintiff’s Motion to Certify Class and Defendants’
3 Motion to Exclude Declaration of Jane D. Nettesheim;

4 WHEREAS, the parties previously proposed a continuance of the Hearing on the
5 subject motions pending a mediation;

6 WHEREAS, for the reasons set forth in the accompanying Joint Declaration and
7 in light of the Court’s denial of the parties’ proposed indefinite continuance of the briefing and
8 hearing on the subject motions, the parties agree that a small amount of additional time is
9 required to complete the briefing on the subject motions,

10 NOW, THEREFORE, the parties hereby stipulate that:

11 1. The November 13, 2008 hearing on Plaintiff’s Motion to Certify Class and
12 Defendants’ Motion to Exclude Declaration of Jane D. Nettesheim is continued until November
13 20, 2008;

14 2. Plaintiff shall file his reply memorandum in further support of Plaintiff’s Motion
15 to Certify Class and his opposition to Defendants’ Motion to Exclude Declaration of Jane D.
16 Nettesheim on or before November 3, 2008 and Defendants shall file their reply in further
17 support of their Motion to Exclude on or before November 10, 2008; and

18 3. The parties respectfully submit pursuant to Local Rule 6-2(a)(3) that the instant
19 stipulated request will have no material effect on the schedule for the case.

20 Dated: October 23, 2008

LATHAM & WATKINS LLP

Raymond A. Gallenberg

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23 By /s/ Raymond A. Gallenberg
Attorneys for Defendants

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1 Dated: October 23, 2008

COHEN, MILSTEIN, HAUSFELD, & TOLL,
P.L.L.C.

Matthew B. Kaplan

By /s/ Matthew B. Kaplan
Lead Counsel for the Proposed Class

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[PROPOSED] ORDER

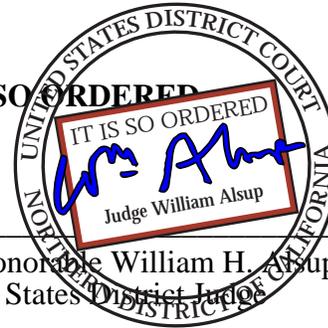
PURSUANT TO STIPULATION, IT IS SO ORDERED:

1. The November 13, 2008 hearing on Plaintiff’s Motion to Certify Class and Defendants’ Motion to Exclude Declaration of Jane D. Nettesheim is rescheduled for November 20, 2008 at 8:00 a.m.; and

2. Plaintiff shall file his reply memorandum in further support of Plaintiff’s Motion to Certify Class and his opposition to Defendants’ Motion to Exclude Declaration of Jane D. Nettesheim on or before November 3, 2008 and Defendants shall file their reply in further support of their Motion to Exclude on or before November 10, 2008.

DATED: October 24, 2008

IT IS SO ORDERED



The Honorable William H. Alsup
United States District Judge

CERTIFICATE OF SERVICE

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I hereby certify that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses of the parties of record.

I further certify that Service Pursuant to Local Rule 23-2 will be made electronically to:

Securities Class Action Clearinghouse
Att. Juan-Carlos Sanchez/Cara Mia Perlas
Stanford University School of Law
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Stanford, CA 94305-8612
scac@law.stanford.edu

/s/ Matthew B. Kaplan
Matthew B. Kaplan