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UNITED STATES DISTRICT COURT

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NORTHERN DISTRICT OF CALIFORNIA

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In re LDK SOLAR SECURITIES
 16 LITIGATION

MASTER FILE NO. C-07-05182-WHA (BZ)

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18 This Document Relates To:
 19 ALL ACTIONS.

**RENEWED STIPULATION AND
 [PROPOSED] ORDER REGARDING
 EXPERT DISCOVERY CUTOFF AND
 REQUEST FOR RECONSIDERATION OF
 NOVEMBER 16, 2009 ORDER**

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WHEREAS, pursuant to the Court’s Third Amended Case Management Order (“CMO”) dated July 8, 2009 (Dkt. 275), the cutoff for all expert discovery is December 3, 2009;

WHEREAS, on October 29, 2009, pursuant to the CMO, Plaintiff identified the four experts they intend to use in this case and served the reports of these experts on Defendants, generally on the topics of the market in which LDK Solar operated, technical aspects relating to LDK’s production, accounting, and damages;

WHEREAS, on November 12, 2009, pursuant to the CMO, Defendants identified the four experts they intend to use in this case and served the reports of these experts on Plaintiffs;

WHEREAS, pursuant to the CMO, Plaintiffs’ experts are due to serve rebuttal reports on November 19, 2009;

WHEREAS, the expert reports address complex issues that require extensive preparation, consultation and analysis;

WHEREAS, no expert depositions were able to be scheduled during the period during which the parties’ experts were preparing their opposition and rebuttal reports, due to the necessities of focusing on the preparation of those reports;

WHEREAS, pursuant to the CMO, the parties have determined to depose each other’s experts after the rebuttal reports are served;

WHEREAS, the eight experts designated by the parties are located at different locations on both the east and west coasts of the United States;

WHEREAS, the Thanksgiving holiday interferes with scheduling depositions during the week of November 23, 2009, due to the holiday plans of witnesses, counsel, and support personnel, and in light of the availability and cost of flights and related travel arrangements;

WHEREAS, several of the experts are currently involved in other litigation, a fact which further complicates deposition scheduling;

WHEREAS, the parties have met and conferred, and have agreed that the expert discovery cutoff should be extended to December 15, 2009 in order to allow each side a reasonable opportunity to conduct expert depositions; and

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: November 19, 2009

