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11	Millennium, LLC), Solar Trust of America, LLC, Solar, CA 1-10 Solar, LLC, Palo Verde Solar I, LLC,	Palo Verde
12	Solar II, LLC, Blythe Solar Power Project Unit 1, I Power Project Unit 2, LLC, Blythe Solar Power Pr	
13	and Blythe Solar Power Project Unit 4 LLC	
14		
15	UNITED STATES DI	
16	NORTHERN DISTRICT	Γ OF CALIFORNIA
17	SAN FRANCISC	
18	MMR GROUP, INC., MMR POWER SOLUTIONS, LLC and	Case No. 3:11-cv-01521-EMC
19	SOUTHWESTERN POWER GROUP II, LLC,	STIPULATION TO EXTEND DEFENDANTS' TIME TO RESPOND
20	Plaintiffs,	TO AMENDED COMPLAINT AND [P <del>ROP</del> OSED] ORDER
21	VS.	
22	STA DEVELOPMENT, LLC (F/K/A SOLAR	The Honorable Judge Edward M. Chen
23	MILLENNIUM, LLC), SOLAR TRUST OF AMERICA, LLC, SOLAR MILLENNIUM AG,	
24	SOLAR MILLENNIUM, INC., CA I-10 SOLAR, LLC, PALO VERDE SOLAR I, LLC,	
25	PALO VERDE SOLAR II, LLC, BLYTHE	
26	SOLAR POWER PROJECT UNIT 1, LLC, BLYTHE SOLAR POWER PROJECT UNIT 2,	
27	LLC, BLYTHE SOLAR POWER PROJECT UNIT 3, LLC AND BLYTHE SOLAR POWER	
28	PROJECT UNIT 4, LLC	
	Defendants.	

## **STIPULATION**

Plaintiffs MMR GROUP, INC., MMR POWER SOLUTIONS, LLC and
SOUTHWESTERN POWER GROUP II, LLC (collectively, "MMR") and Defendants STA
DEVELOPMENT, LLC, SOLAR TRUST OF AMERICA, LLC, SOLAR MILLENNIUM, INC.,
CA I-10 SOLAR, LLC, PALO VERDE SOLAR I, LLC, PALO VERDE SOLAR II, LLC,
BLYTHE SOLAR POWER PROJECT UNIT 1, LLC, BLYTHE SOLAR POWER PROJECT
UNIT 2, LLC, BLYTHE SOLAR POWER PROJECT UNIT 3, LLC AND BLYTHE SOLAR
POWER PROJECT UNIT 4 LLC (collectively, the "STAD Defendants") respectfully request that
the Court extend the time for the STAD Defendants to respond to the Amended Complaint, filed
on October 4, 2011 (ECF No. 102) and served on the STAD Defendants on October 7, 2011, by
one week from November 7, 2011 to November 14, 2011.

The reason for the parties' joint request is that the parties are in advanced stages of settlement discussions and are hoping to reach a settlement forthwith. The parties have requested, and this Court has granted, two continuances of a hearing on an earlier motion to dismiss filed by one of the STAD Defendants. The filing of the Amended Complaint mooted that motion to dismiss. The parties have not requested any extensions of time since the Amended Complaint was filed. Because the parties are only asking for a one-week extension, the parties' request will have a *de minimis*, if any, impact on the schedule. In the interests of judicial economy, the parties therefore request that Court extend the STAD Defendants' time to respond to the Amended Complaint by one week from November 7, 2011 to November 14, 2011.

1	MILBANK, TWEED, HADLEY & McCLOY LLP
2	Dated: November 4, 2011  By: /s/ Aaron Renenger  By: /s/ Aaron Renenger
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12	Solar I, LLC, Palo Verde Solar II, LLC, Blythe Solar Power Project Unit 1, LLC, Blythe Solar Power Project
13	Unit 2, LLC, Blythe Solar Power Project Unit 3, LLC and Blythe Solar Power Project Unit 4 LLC
14	
15	Dated: November 4, 2011 WATT, TIEDER, HOFFAR
16	& FITZGERALD, LLP
17	By: /s/ Nicholas A. Merrell Bennett J. Lee (CA Bar No. 230482)
18	Nicholas A. Merrell (CA Bar No. 240795)
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22	Attorneys for Plaintiffs MMR Group, Inc., MMR Power
23	Solutions, LLC and Southwestern Power Group II, LLC
24	TES DISTRICT
25	PURSUANT TO STIPULATION, IT IS SO ORDERED.
26	Dated: Dated: UNGE UNGE
27	UNGE IT IS SO STATE OF THE PROPERTY OF THE PRO
28	2 Judge Edward M. Chen