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Attorneys for Defendants STA Development, LLC,
 11 *Solar Trust of America, LLC, Solar Millennium, Inc.,*
 12 *CA I-10 Solar, LLC, Palo Verde Solar I, LLC,*
 13 *Palo Verde Solar II, LLC, Blythe Solar Power Project*
Unit 1, LLC, Blythe Solar Power Project Unit 2, LLC,
 14 *Blythe Solar Power Project Unit 3, LLC and*
Blythe Solar Power Project Unit 4, LLC

15 UNITED STATES DISTRICT COURT
 16 NORTHERN DISTRICT OF CALIFORNIA
 17 SAN FRANCISCO DIVISION

18 MMR GROUP, INC.,
 MMR POWER SOLUTIONS, LLC and
 19 SOUTHWESTERN POWER GROUP II, LLC,

20 Plaintiffs,

21 vs.

22 STA DEVELOPMENT, LLC (F/K/A SOLAR
 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
 SOLAR POWER PROJECT UNIT 1, LLC,
 26 BLYTHE SOLAR POWER PROJECT UNIT 2,
 27 LLC, BLYTHE SOLAR POWER PROJECT
 UNIT 3, LLC AND BLY,THE SOLAR POWER
 28 PROJECT UNIT 4, LLC
 Defendants.

Case No. 3:11-cv-01521-EMC

**SIXTH STIPULATION TO EXTEND
 DEFENDANTS' TIME TO RESPOND
 TO AMENDED COMPLAINT AND
 [PROPOSED] ORDER**

**The Honorable Judge
 Edward M. Chen**

1 **STIPULATION**

2 Plaintiffs MMR GROUP, INC., MMR POWER SOLUTIONS, LLC and
3 SOUTHWESTERN POWER GROUP II, LLC (collectively, "MMR") and Defendants STA
4 DEVELOPMENT, LLC, SOLAR TRUST OF AMERICA, LLC, SOLAR MILLENNIUM, INC.,
5 CA I-10 SOLAR, LLC, PALO VERDE SOLAR I, LLC, PALO VERDE SOLAR II, LLC,
6 BLYTHE SOLAR POWER PROJECT UNIT 1, LLC, BLYTHE SOLAR POWER PROJECT
7 UNIT 2, LLC, BLYTHE SOLAR POWER PROJECT UNIT 3, LLC AND BLYTHE SOLAR
8 POWER PROJECT UNIT 4, LLC (collectively, the "STAD Defendants") respectfully request
9 that the Court extend the time for the STAD Defendants to respond to the Amended Complaint,
10 filed on October 4, 2011 (ECF No. 102) and served on the STAD Defendants on October 7, 2011,
11 by 14 days from December 27, 2011 to January 10, 2012.

12 On November 4th and 14th, the parties requested, and this Court later granted, a one-week
13 extension of time for the STAD Defendants to respond to the Amended Complaint because the
14 parties were in advanced stages of settlement discussions. On November 22nd and December 1st,
15 the parties requested, and this Court later granted, extensions of two weeks due to continued
16 progress in settlement negotiations. And on December 19, the parties requested and this Court
17 later granted an extension of one week. The timing of finalizing a settlement has been impacted
18 by several complex factors, but the parties continue to be hopeful that they will execute a
19 settlement agreement forthwith. Due to the upcoming holidays and the continued progress in
20 reaching a settlement, the parties request a 14 day extension of the time for the STAD Defendants
21 to respond to the Amended Complaint. The parties' request will have a *de minimis*, if any, impact
22 on the schedule. In the interests of judicial economy, the parties therefore request that Court
23 extend the STAD Defendants' time to respond to the Amended Complaint by 14 days from
24 December 27, 2011 to January 10, 2012.

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MILBANK, TWEED, HADLEY & McCLOY LLP

Dated: December 27, 2011

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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*

Dated: December 27, 2011

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 12/27/11

