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14	Palo Verde Solar II, LLC, Blythe Solar Power Project Unit 1, LLC, Blythe Solar Power Project Unit 2, LLC,			
15	Blythe Solar Power Project Unit 4, LLC Blythe Solar Power Project Unit 4, LLC			
16	UNITED STATES DISTRICT COURT			
17	NORTHERN DISTRICT OF CALIFORNIA			
18	SAN FRANCISCO DIVISION			
19	MMR GROUP, INC., Case No. 3:11-cv-01521-EMC			
20	MMR POWER SOLUTIONS, LLC and SOUTHWESTERN POWER GROUP II, LLC,	ELEVENTH STIPULATION TO EXTEND DEFENDANTS'		
21	Plaintiffs,	TIME TO RESPOND TO AMENDED COMPLAINT		
22	VS.	AMENDED COMPLAINT AND [PROPOSED] ORDER		
23	STA DEVELOPMENT, LLC (F/K/A SOLAR MILLENNIUM, LLC), SOLAR TRUST OF	The Honorable Judge		
24	AMERICA, LLC, SOLAR MILLENNIUM AG,			
25	SOLAR MILLENNIUM, INC., CA I-10 SOLAR, LLC, PALO VERDE SOLAR I, LLC, PALO VERDE SOLAR			
26	II, LLC, BLYTHE SOLAR POWER PROJECT UNIT 1, LLC, BLYTHE SOLAR POWER PROJECT UNIT 2,			
27	LLC, BLYTHE SOLAR POWER PROJECT UNIT 3, LLC			
28	AND BLYTHE SOLAR POWER PROJECT UNIT 4, LLC Defendants.			

ELEVENTH STIPULATION TO EXTEND DEFENDANTS' TIME TO RESPOND TO AMENDED COMPLAINT AND [PROPOSED] ORDER Dockets.Justia.com

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1	Plaintiffs MMR GROUP, INC., MMR POWER SOLUTIONS, LLC and
2	SOUTHWESTERN POWER GROUP II, LLC (collectively, "MMR") and Defendants STA
3	DEVELOPMENT, LLC, SOLAR TRUST OF AMERICA, LLC, SOLAR MILLENNIUM, INC.,
4 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 12	by two weeks from March 6, 2012 to March 13, 2012.
12	On November 4 th and 14 th , the parties requested, and this Court later granted, a one-week
14	extension of time for the STAD Defendants to respond to the Amended Complaint because the
15	parties were in advanced stages of settlement discussions. On November 22 nd , December 1 st , and
16	December 27 th , January 10 th , January 20 th , February 3 rd , and February 21 st , the parties requested,
17	and this Court later granted, extensions of two weeks due to continued progress in settlement
18	negotiations. The parties continue to be hopeful that they will execute a settlement agreement
19 20	forthwith. Due to the continued progress in reaching a settlement, the parties request a one-week
20 21	extension of the time for the STAD Defendants to respond to the Amended Complaint. The
22	parties' request will have a <i>de minimis</i> , if any, impact on the schedule. In the interests of judicial
23	economy, the parties therefore request that the Court extend the STAD Defendants' time to
24	respond to the Amended Complaint by two weeks from March 6, 2012 to March 13, 2012.
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26	
27	
28	
	- 2 -
l	ELEVENTH STIPULATION TO EXTEND DEFENDANTS' TIME TO RESPOND TO

	By: /s/
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	<i>Unit 1, LLC, Blythe Solar Power Project Unit 2, LLC, Blythe Solar Power Project Unit 3, LLC and Blythe Solar</i>
	Power Project Unit 4, LLC
Dated: March 5, 2012	WATT, TIEDER, HOFFAR & FITZGERALD, LLP
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	Attorneys for Plaintiffs MMR Group, Inc., MMR Power
	Solutions, LLC and Southwestern Power Group II, LLC
	FS DISTRICE
PURSUANT TO STIPULATIO	ON, IT IS SO ORDERED.
Dated:3/6/12	
	UNTED STATES DIE POPERED VNCA
	IT IS SO ORDERED
	Z Churd M. Chen
	Z Judge Edward M. Chen
	Judge Luva
	-3-
ELEVENTH STIPULATI	ON TO EXTEND DEFENDANTS DRAFT ORESPOND TO
	PURSUANT TO STIPULATIO Dated:3/6/12