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 17 *Attorneys for Defendants STA Development, LLC,*
 18 *Solar Trust of America, LLC, Solar Millennium, Inc.,*
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 20 *Palo Verde Solar II, LLC, Blythe Solar Power Project*
 21 *Unit 1, LLC, Blythe Solar Power Project Unit 2, LLC,*
 22 *Blythe Solar Power Project Unit 3, LLC and*
 23 *Blythe Solar Power Project Unit 4, LLC*

24 UNITED STATES DISTRICT COURT
 25 NORTHERN DISTRICT OF CALIFORNIA
 26 SAN FRANCISCO DIVISION

27 MMR GROUP, INC.,
 28 MMR POWER SOLUTIONS, LLC and
 SOUTHWESTERN POWER GROUP II, LLC,
 Plaintiffs,

vs.

STA DEVELOPMENT, LLC (F/K/A SOLAR
 MILLENNIUM, LLC), SOLAR TRUST OF
 AMERICA, LLC, SOLAR MILLENNIUM AG,
 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
 Defendants.

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

**JOINT STIPULATION TO
 STAY ACTION ; ORDER RESETTING**

**CMC
 The Honorable Judge
 Edward M. Chen**

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 CA I-10 SOLAR, LLC, PALO VERDE SOLAR I, LLC, PALO VERDE SOLAR II, LLC,
5 BLYTHE SOLAR POWER PROJECT UNIT 1, LLC, BLYTHE SOLAR POWER PROJECT
6 UNIT 2, LLC, BLYTHE SOLAR POWER PROJECT UNIT 3, LLC AND BLYTHE SOLAR
7 POWER PROJECT UNIT 4, LLC (collectively, the “STAD Defendants”) submit the following:

9 **WHEREAS**, MMR and the STAD Defendants have executed an Agreement and Release
10 (the “Settlement Agreement”) to settle and compromise all claims and disputes between them,
11 including those currently asserted in the above-captioned action (the “Litigation”) subject to, *inter*
12 *alia*, payment and clearance of a settlement payment (“Settlement Payment”);

14 **WHEREAS**, MMR and the STAD Defendants agree, pursuant to the Settlement
15 Agreement, that the Litigation should be stayed pending payment and clearance of the Settlement
16 Payment and execution of an ancillary agreement, after which the parties intend to file a joint
17 stipulation to dismiss the Litigation with prejudice (the “Joint Stipulation to Dismiss”); and

18 **WHEREAS**, pursuant to the Settlement Agreement, if a party defaults under the
19 Settlement Agreement the non-defaulting party may seek relief from the Stay;

21 **IT IS HEREBY STIPULATED AND AGREED**, subject to the Court’s approval, that
22 the Litigation be stayed until (i) the Joint Stipulation to Dismiss is filed with the Court or (ii) a
23 non-defaulting party seeks relief from the Stay because of a default of the other party under the
24 Settlement Agreement.

1 Dated: March 12, 2012

MILBANK, TWEED, HADLEY & McCLOY LLP

2 By: /s/ Aaron Renenger

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18 *Palo Verde Solar II, LLC, Blythe Solar Power Project*
19 *Unit 1, LLC, Blythe Solar Power Project Unit 2, LLC,*
20 *Blythe Solar Power Project Unit 3, LLC and Blythe Solar*
21 *Power Project Unit 4, LLC*

22 Dated: March 12, 2012

WATT, TIEDER, HOFFAR & FITZGERALD, LLP

23 By: /s/ Nicholas A. Merrell

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Solutions, LLC and Southwestern Power Group II, LLC

29 PURSUANT TO STIPULATION, IT IS SO ORDERED.

The 4/3/12 CMC is reset for 8/31/12
at 9:00 a.m.

30 Dated: 3/13/12

31 UNITED STATES DISTRICT COURT

