

1 UNITED STATES DISTRICT COURT  
 2 NORTHERN DISTRICT OF CALIFORNIA  
 3 SAN FRANCISCO DIVISION

4 MMR GROUP, INC.,  
 5 MMR POWER SOLUTIONS, LLC and  
 6 SOUTHWESTERN POWER GROUP II, LLC,

7 Plaintiffs,

8 vs.

9 STA DEVELOPMENT, LLC (F/K/A SOLAR  
 10 MILLENNIUM, LLC), SOLAR TRUST OF  
 11 AMERICA, LLC, SOLAR MILLENNIUM AG,  
 12 SOLAR MILLENNIUM, INC., CA I-10 SOLAR, LLC,  
 13 PALO VERDE SOLAR I, LLC, PALO VERDE SOLAR  
 14 II, LLC, BLYTHE SOLAR POWER PROJECT UNIT 1,  
 15 LLC, BLYTHE SOLAR POWER PROJECT UNIT 2,  
 16 LLC, BLYTHE SOLAR POWER PROJECT UNIT 3, LLC  
 17 AND BLYTHE SOLAR POWER PROJECT UNIT 4, LLC

18 Defendants.

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

**STIPULATION REGARDING  
 SUBSTITUTION OF  
 COUNSEL AND  
 [PROPOSED] ORDER**

**The Honorable Judge  
 Edward M. Chen**

19 **TO THE COURT AND ALL PARTIES AND THEIR COUNSEL OF RECORD:**

20 PLEASE TAKE NOTICE that, subject to approval by the Court, Defendants STA  
 21 Development, LLC, Solar Trust Of America, LLC, Solar Millennium, Inc., CA I-10 Solar, LLC,  
 22 Palo Verde Solar I, LLC, Palo Verde Solar II, LLC, Blythe Solar Power Project Unit 1, LLC,  
 23 Blythe Solar Power Project Unit 2, LLC, Blythe Solar Power Project Unit 3, LLC, and Blythe  
 24 Solar Power Project Unit 4, LLC (the “Defendants”) hereby substitute Michael R. Haven of K&L  
 25 Gates LLP, California State Bar No. 208721, as their attorney of record in place of Milbank,  
 26 Tweed, Hadley & McCloy LLP and the individual attorneys at Milbank, Tweed, Hadley &  
 27 McCloy LLP who have appeared in this litigation.<sup>1</sup>

28 <sup>1</sup> The individual attorneys who have appeared in this action include David R. Gelfand, Jerry L. Marks, Aaron L. Reneger, Caitlin Hawks, and Rachel Penski Fissell.

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All pleadings, notices, orders, and other papers in the above-captioned matter should  
henceforth be served upon:

Michael R. Haven  
K&L Gates LLP  
630 Hansen Way  
Palo Alto, CA 94304  
mike.haven@klgates.com

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Dated: May 8, 2012


**K&L GATES LLP**

By: /s/ \_\_\_\_\_  
Michael R. Haven (SBN 208721)  
630 Hansen Way  
Palo Alto, California 94304  
Telephone: (650) 798-6772  
Facsimile: (650) 798-6701

**MILBANK, TWEED, HADLEY & McCLOY LLP**

By: /s/ \_\_\_\_\_  
Aaron Renenger (SBN 222675)  
601 S. Figueroa Street, 30th Floor  
Los Angeles, California 90017  
Telephone: (213) 892-4000  
Facsimile: (213) 629-5063

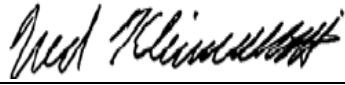
I consent to the above substitution:

By:  \_\_\_\_\_  
Edward Kleinschmidt  
*President and Chief Operating Officer, Solar Trust of America*

*Chief Restructuring Officer, STA Development, LLC,  
Solar Trust Of America, LLC, CA I-10 Solar, LLC,  
Palo Verde Solar I, LLC, and Palo Verde Solar II,  
LLC*

By: \_\_\_\_\_  
Werner Thonack  
*President, Treasurer and Secretary, Solar  
Millennium, Inc., manager of Blythe Solar Power  
Project Unit 3, LLC, and Blythe Solar Power Project  
Unit 4, LLC*

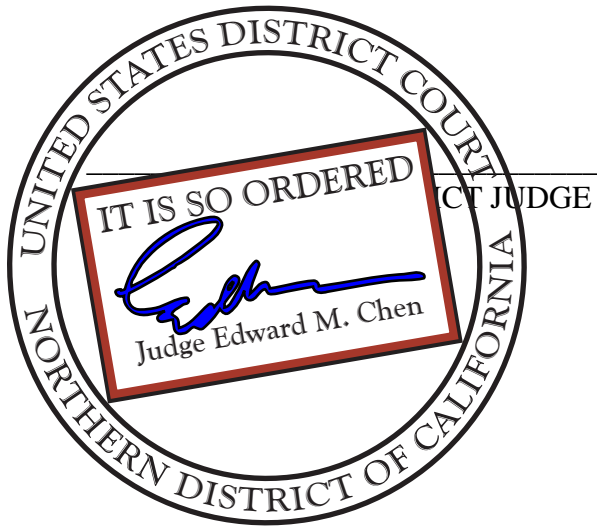
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By:   
Edward Kleinschmidt  
Chief Restructuring Officer, STA Development, LLC,  
manager of Blythe Solar Power Project Unit 1, LLC  
and Blythe Solar Power Project Unit 2

The substitution of attorney is hereby approved and so ORDERED.

June 5, 2012

Dated: \_\_\_\_\_



1 Dated: May 8, 2012

**K&L GATES LLP**

2 By: /s/  
3 Michael R. Haven (SBN 208721)  
4 630 Hansen Way  
5 Palo Alto, California 94304  
6 Telephone: (650) 798-6772  
7 Facsimile: (650) 798-6701

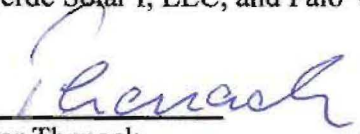
**MILBANK, TWEED, HADLEY & McCLOY LLP**

8 By: /s/  
9 Aaron Renenger (SBN 222675)  
10 601 S. Figueroa Street, 30th Floor  
11 Los Angeles, California 90017  
12 Telephone: (213) 892-4000  
13 Facsimile: (213) 629-5063

I consent to the above substitution:

14 By: \_\_\_\_\_  
15 Edward Kleinschmidt  
16 *President and Chief Operating Officer, Solar Trust of*  
17 *America*

*Chief Restructuring Officer, STA Development, LLC,*  
*Solar Trust Of America, LLC, CA I-10 Solar, LLC,*  
*Palo Verde Solar I, LLC, and Palo Verde Solar II,*  
*LLC*

18 By:   
19 Werner Thonack  
20 *President, Treasurer and Secretary, Solar*  
21 *Millennium, Inc., manager of Blythe Solar Power*  
22 *Project Unit 3, LLC, and Blythe Solar Power Project*  
23 *Unit 4, LLC*

24 By: \_\_\_\_\_  
25 Edward Kleinschmidt  
26 *Chief Restructuring Officer, STA Development, LLC,*  
27 *manager of Blythe Solar Power Project Unit 1, LLC*  
28 *and Blythe Solar Power Project Unit 2*

The substitution of attorney is hereby approved and so ORDERED.

Dated: \_\_\_\_\_

UNITED STATES DISTRICT JUDGE