

1 LIONEL Z. GLANCY (#134180)  
 2 MICHAEL M. GOLDBERG (#188669)  
 3 GLANCY BINKOW & GOLDBERG LLP  
 4 1925 Century Park East, Suite 2100  
 5 Los Angeles, California 90067  
 6 Telephone: (310) 201-9150  
 7 Fax: (310) 201-9160  
 8 E-mail: info@glancylaw.com

9 *Liaison Counsel for Lead Plaintiffs James Bachesta, Thanh*  
 10 *Le and Chen Weifeng*

11 [Additional counsel listed on signature page]

12 UNITED STATES DISTRICT COURT  
 13 NORTHERN DISTRICT OF CALIFORNIA

14 SCOTT BRUCE, individually and on behalf  
 15 of all others similarly situated,

16 Plaintiff,

17 v.

18 SUNTECH POWER HOLDINGS CO.  
 19 LTD., et al.,

20 Defendants.

Case No. 3:12-CV-4061-RS

**STIPULATION AND [PROPOSED]  
 ORDER REGARDING PRETRIAL  
 SCHEDULING**

1 WHEREAS, on November 13, 2012, the Court issued Orders finding that the above-  
2 captioned action and *Le v. Suntech Power Holdings Co., Ltd.*, No. 4:12-CV-04655 are related,  
3 appointing James Bachesta, Thanh Le and Chen Weifeng (collectively, the “Suntech Investor  
4 Group”) as Lead Plaintiffs, and approving Cohen Milstein Sellers & Toll PLLC and Pomerantz  
5 Grossman Hufford Dahlstrom & Gross LLP as Co-Lead Counsel;

6 WHEREAS, on November 14, 2012, the Court issued an Order consolidating the related  
7 actions into *Bruce v. Suntech Power Holdings Company, Inc., et al.*, No. 3:12-CV-04061-RS for  
8 pre-trial purposes;

9 WHEREAS, Lead Plaintiffs and Defendant Suntech Power Holdings Co., Ltd.  
10 (“Suntech”), through their respective counsel, have conferred and agreed upon a date for Lead  
11 Plaintiffs to file a Consolidated Amended Class Action Complaint (the “Amended Complaint”);

12 WHEREAS, Lead Plaintiffs and Suntech, through their respective counsel, have further  
13 agreed upon the date for Suntech to answer, move to dismiss, or otherwise respond to the  
14 Amended Complaint, and the dates for briefing any such motion to dismiss;

15 Accordingly, IT IS HEREBY STIPULATED AND AGREED, by Lead Plaintiffs and  
16 Suntech, through their undersigned counsel, subject to Court approval, as follows:

- 17 1. Lead Plaintiffs shall file their Amended Complaint on or before February 5, 2013.
- 18 2. Suntech shall answer, move to dismiss or otherwise respond to the Amended  
19 Complaint on or before April 8, 2013.
- 20 3. Lead Plaintiffs shall file their opposition to any motion to dismiss on or before  
21 June 7, 2013.
- 22 4. Suntech shall file any reply in support of its motion to dismiss on or before July 8,  
23 2013.

1 Dated: December 14, 2012

Respectfully Submitted,

2 GLANCY BINKOW & GOLDBERG LLP

3 By: s/ Michael Goldberg

4 Lionel Z. Glancy

5 Michael M. Goldberg

6 1925 Century Park East, Suite 2100

7 Los Angeles, California 90067

8 Telephone: (310) 201-9150

9 Facsimile: (310) 201-9160

10 *Liaison Counsel for Lead Plaintiffs James*  
11 *Bachesta, Thanh Le and Chen Weifeng*

12 COHEN MILSTEIN SELLERS  
13 & TOLL PLLC

14 Steven J. Toll

15 Daniel S. Sommers (admitted *pro hac vice*)

16 Joshua M. Kolsky

17 Elizabeth Aniskevich

18 1100 New York Avenue, N.W.

19 West Tower, Suite 500

20 Washington, D.C. 20005

21 Telephone: (202) 408-4600

22 Fax: (202) 408-4699

23 POMERANTZ GROSSMAN HUFFORD  
24 DAHLSTROM & GROSS LLP

25 Patrick V. Dahlstrom (admitted *pro hac vice*)

26 Joshua B. Silverman (admitted *pro hac vice*)

27 Louis C. Ludwig (admitted *pro hac vice*)

28 10 South LaSalle St., Suite 3505

Chicago, Illinois 60603

Telephone: (312) 377-1181

Fax: (312) 377-1184

Email: pdahlstrom@pomlaw.com

*Co-Lead Counsel for Lead Plaintiffs James*  
*Bachesta, Thanh Le and Chen Weifeng*

1 Dated: December 14, 2012

SHEARMAN & STERLING LLP

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By: *s/ Stephen D. Hibbard*  
Stephen D. Hibbard  
Four Embarcadero Center, Suite 3800  
San Francisco, CA 94111  
Telephone: (415) 616-1100  
Fax: (415) 616-1199  
Email: shibbard@shearman.com

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5

6

SHEARMAN & STERLING LLP  
Jerome S. Fortinsky (admitted *pro hac vice*)  
H. Miriam Farber (admitted *pro hac vice*)  
599 Lexington Avenue  
New York, NY 10022  
Telephone: (212) 848-4000  
Fax: (212) 848-7179  
Email: jfortinsky@shearman.com  
mfarber@shearman.com

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*Counsel for Defendant Suntech Power Holdings Co., Ltd.*

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14 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

15 DATED: 12/17/12

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Hon. Richard Seeborg  
United States District Judge

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