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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

Solyndra LLC,

Plaintiff,

v.

Suntech Power Holdings Co., Ltd., Suntech
America, Inc., Trina Solar Limited, Trina Solar
(U.S.), Inc., Yingli Green Energy Holding Company
Limited, Yingli Green Energy Americas, Inc.

Defendants.

Case No. CV-12-05272-SBA-EDL

**STIPULATION FOR EXTENSION OF
TIME TO FILE OPPOSITION TO
PLAINTIFF'S MOTION FOR LEAVE
FROM RULE 26(f) ; ORDER AS MODIFIED**

Judge: Hon. Elizabeth D. Laporte
Courtroom: E
Hearing Time: Not Set
Hearing Time: Not Set

1 WHEREAS, on December 19, 2012, Plaintiff filed a Motion for Leave from Rule 26(f)
2 to Serve a Single Document Request (Dkt. No. 25);

3 WHEREAS, Defendants' opposition to Plaintiff's motion is currently due January 2,
4 2013;

5 WHEREAS, due to the fact that the response period falls almost exclusively over the
6 winter holiday vacation, Defendants require an additional week to prepare their joint opposition brief;

7 WHEREAS, the Parties, through their counsel, have discussed this matter and agreed
8 to a one-week extension for Defendants to file their opposition brief;

9 WHEREAS, the Parties have only previously requested one time modification from
10 the Court—an order implementing a stipulated briefing schedule and extending time to respond to
11 Plaintiff's complaint (Dkt. No. 24);

12 NOW, THEREFORE, SUBJECT TO THE COURT'S APPROVAL, the Parties agree
13 that Defendants shall have until January 9, 2013 to file their opposition brief to Plaintiff's Motion for
14 Leave from Rule 26(f) to Serve a Single Document Request, and Plaintiff shall have until January 16,
15 2013 to file a reply brief.

16
17 Dated: December 26, 2012

SIMPSON THACHER & BARTLETT LLP

18
19 By: /s/ James Kreissman
20 James Kreissman
21 Matthew J. Reilly
(moving for admission *pro hac vice*)

22 *Attorneys for Defendants*
23 Yingli Green Energy Holding Co. Ltd. and
24 Yingli Green Energy Americas, Inc.

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SHEARMAN & STERLING LLP

By: /s/ James Donato
James Donato

Mikael Abye

Attorneys for Defendants
Suntech Power Holdings Co., Ltd. and
Suntech America, Inc.

KIRKLAND & ELLIS LLP

By: /s/ Eliot A. Adelson
Eliot A. Adelson

Daniel E. Laytin (moving for admission *pro hac vice*)

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Trina Solar Limited and
Trina Solar (U.S.), Inc.

WINSTON & STRAWN LLP

By: /s/ William C. O'Neil
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Telephone: (312) 558-5600

Attorneys for Plaintiff
Solyndra LLC

1 **ATTESTATION OF CONCURRENCE IN FILING**

2 Pursuant to the Northern District of California’s General Order No. 45, Section X(B)
3 and Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained
4 from Defendants’ counsel James Donato, Mikael Abye, Eliot A. Adelson, and Daniel E. Laytin and
5 Plaintiff’s counsel William C. O’Neil.

6
7 Dated: December 26, 2012

SIMPSON THACHER & BARTLETT LLP

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James Kreissman

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14 *Attorney for Defendants*
15 Yingli Green Energy Holding Co. Ltd. and
16 Yingli Green Energy Americas, Inc.

17 **~~PROPOSED~~ ORDER**

18 PURSUANT TO STIPULATION, IT IS SO ORDERED.

19 A hearing on the motion is set for January 29, 2013, at 4:00 p.m.

20 Dated: December 27, 2012

