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 9 Attorneys for Defendant
 Rusnano USA, Inc.

10 UNITED STATES DISTRICT COURT
 11 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 12 SAN JOSE DIVISION

13 NEAS LIMITED, individually in its own right
 14 and derivatively on behalf of NITOL SOLAR
 LIMITED; and ANDREY TRETYAKOV,

15 Plaintiffs,

16 v.

17 OJSC RUSNANO; RUSNANO
 MANAGEMENT COMPANY, LLC;
 18 RUSNANO CAPITAL, A.G.; RUSNANO
 CAPITAL, LLC; RUSNANO USA, INC.;
 19 FONDS RUSNANO CAPITAL, A.G.;
 ANATOLY CHUBAIS; OLEG KISELEV;
 20 IRINA RAPPAPORT; SERGEY
 POLIKARPOV; VALERY ROSTOKIN;
 21 SHERIGO RESOURCES LIMITED; and
 JOHN DOES 1 THROUGH 10,

22 Defendants.
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Case No. 5:15-cv-01612-RMW

**JOINT STIPULATION EXTENDING
 TIME TO RESPOND TO THE FIRST
 AMENDED COMPLAINT**

**(~~PROPOSED~~ ORDER FILED
 CONCURRENTLY HEREWITH)**

1 WHEREAS, Plaintiffs Neas Limited, individually in its own right and derivatively on
2 behalf of Nitol Solar Limited, and Andrey Tretyakov commenced this action by filing a complaint
3 (the “Complaint”) on April 8, 2015;

4 WHEREAS, defendants Rusnano USA, Inc. (“Rusnano USA”); OJSC Rusnano; Rusnano
5 Management Company, LLC; Rusnano Capital, A.G.; Rusnano Capital, LLC; Fonds Rusnano
6 Capital, S.A.; Anatoly Chubais; Oleg Kiselev; Irina Rapoport; Sergey Polikarpov; and Valery
7 Rostokin (collectively, the “Moving Defendants”) filed motions to dismiss the Complaint on
8 September 11, 2015;

9 WHEREAS, rather than oppose the motions to dismiss, pursuant to Federal Rule of Civil
10 Procedure 15(a) Plaintiffs filed a first amended complaint (the “First Amended Complaint”) on
11 October 9, 2015;

12 WHEREAS, Plaintiffs have agreed to a short extension of the Moving Defendants’ time to
13 respond to the First Amended Complaint;

14 NOW, THEREFORE, IT IS HEREBY STIPULATED, pursuant to Local Rule 6-1, as
15 follows: the Moving Defendants’ time to respond to the First Amended Complaint is extended to
16 and including October 30, 2015.

17 **IT IS SO STIPULATED.**

18 DATED: October 23, 2015

ORRICK, HERRINGTON & SUTCLIFFE LLP

19
20 By: /s/ Karen Johnson-McKewan

Karen Johnson-McKewan

Robert L. Sills

Olga N. Sirodoeva

21 Attorneys for Defendants OJSC Rusnano;
22 Rusnano Management Company, LLC; Rusnano
23 Capital, A.G.; Rusnano Capital, LLC; Fonds
24 Rusnano Capital, S.A.; Anatoly Chubais; Oleg
25 Kiselev; Irina Rapoport; Sergey Polikarpov; and
26 Valery Rostokin
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1 DATED: October 23, 2015

WILSON SONSINI GOODRICH & ROSATI PC

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By: /s/ Rodney Grant Strickland, Jr.
Rodney Grant Strickland, Jr.
Attorneys for Defendant Rusnano USA, Inc.

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5 DATED: October 23, 2015

FOX ROTHSCHILD LLP

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By: /s/ Ely Goldin
Ely Goldin
W. Christain Moffitt
Michael A. Sweet
Jack Praetzellis
Attorneys for Plaintiffs NEAS Limited,
individually and in its own right and derivatively
on behalf of Nitol Solar Limited, and Andrey
Tretyakov

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13 **PURSUANT TO THE FOREGOING STIPULATION, IT IS SO ORDERED,**

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15 Dated: October 27, 2015

Ronald M. Whyte

Honorable Ronald M. Whyte
Judge, U.S. District Court for the
Northern District of California

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ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1

I, Rodney G. Strickland, Jr., am the ECF User whose identification and password are being used to file this document. In compliance with Civil Local Rule 5-1, I hereby attest that all signatories have concurred in this filing.

DATED: October 23, 2015

WILSON SONSINI GOODRICH & ROSATI PC

By: /s/ Rodney G. Strickland, Jr.
Rodney G. Strickland, Jr.