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Lead Counsel for the Proposed Class

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA

18 In re LDK SOLAR SECURITIES
LITIGATION

MASTER FILE NO. C-07-05182-WHA

20 This Document Relates To:
21 ALL ACTIONS.

**STIPULATION AND [PROPOSED] ORDER
MODIFYING BRIEFING AND HEARING
SCHEDULE ON LEAD PLAINTIFF'S
MOTION FOR CLASS CERTIFICATION**

[Civil L.R. 7-1(a)]

1 WHEREAS, pursuant to the Court's June 3, 2008 Case Management Order, Lead
2 Plaintiff's motion for class certification must be filed on August 28, 2008;

3 WHEREAS, Lead Plaintiff's motion for class certification is currently scheduled
4 to be heard on October 2, 2008, at 8:00 a.m.;

5 WHEREAS, the parties have, in good faith, met and conferred regarding the
6 current briefing and hearing schedule, and agree that class-related discovery is desired and that
7 more time is needed to conduct such discovery;

8 NOW, THEREFORE, the parties hereby stipulate that:

9 1. Lead Plaintiff shall file his motion for class certification on **August 28,**
10 **2008**, the date set in the current Case Management Order.

11 2. Defendants shall file any opposition to Lead Plaintiff's motion for class
12 certification no later than **September 29, 2008**.

13 3. Lead Plaintiff shall file any reply in support of his motion for class
14 certification no later than **October 27, 2008**.

15 4. The hearing on Lead Plaintiff's motion for class certification shall occur
16 on **November 13, 2008**, at 8:00 a.m.

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Dated: August 28, 2008

LATHAM & WATKINS LLP
Raymond A. Gallenberg

By _____ /S/

Attorneys for Defendants

Dated: August 28, 2008

COHEN, M MILSTEIN, HAUSFELD, &
TOLL, P.L.L.C.
Matthew B. Kaplan

By _____ /S/

Lead Counsel for Lead Plaintiff Shahpour
Javidzad and the Proposed Class

I, Raymond A. Gallenberg, am the ECF User whose ID and password are being used to file this Stipulation and [Proposed] Order Modifying Briefing and Hearing Schedule on Lead Plaintiff's Motion for Class Certification. In compliance with General Order 45, X.B., I hereby attest that Matthew B. Kaplan has concurred in this filing.

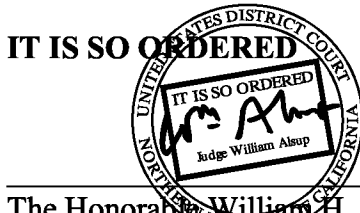
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[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED:

1. Lead Plaintiff shall file his motion for class certification on **August 28, 2008.**
2. Defendants shall file any opposition to Lead Plaintiff's motion for class certification no later than **September 29, 2008.**
3. Lead Plaintiff's shall file any reply in support of his motion for class certification no later than **October 27, 2008.**
4. The hearing on Lead Plaintiff's motion for class certification shall occur on **November 13, 2008**, at 8:00 a.m.

Dated: September 2, 2008



IT IS SO ORDERED

The Honorable **William H. Alsup**
United States District Judge