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 13 UNITED STATES DISTRICT COURT
 14 NORTHERN DISTRICT OF CALIFORNIA

15 IN RE LDK SOLAR SECURITIES
 LITIGATION

Master File No. C-07-05182-WHA

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 17 This Document Relates to:
 ALL ACTIONS

**[PROPOSED] ORDER DENYING
 MOTION FOR PROTECTIVE ORDER
 AND GRANTING DISCOVERY**

Judge: Hon. William H. Alsup
 Date: September 25, 2008
 Time: 8:00 a.m.
 Courtroom: 9, 19th Floor

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 24 The Motion for a Protective Order brought by defendants LDK Solar Co., Ltd., LDK Solar USA,
 25 Inc., Xiaofeng Peng, and Jack Lai ("Defendants ") came for hearing on September 25, 2008. The Court,
 26 having considered Defendants' Motion and Lead Plaintiff's Opposition thereto, and the parties' oral
 27 argument thereon, and good cause therefore appearing, **HEREBY ORDERS:**

- 28 1. Defendants' Motion for a Protective Order is denied.

1 2. Defendants shall promptly produce or cause to be produced all documents whose
2 production is called for by Lead Plaintiff's First Request for Production of Documents or by Lead
3 Plaintiff's subpoena to the law firm of Simpson Thacher & Bartlett LLP ("Simpson Thacher ") which
4 have been withheld on the grounds of privilege, work product immunity or an assertion of undue
5 burden and Defendants shall not further assert that any such document is protected by the attorney-
6 client privilege or work product immunity, or that these documents, or any of them, are irrelevant
7 and that their production would impose an undue burden.

8 3. This order does not preclude Defendants from asserting in good faith, to the extent
9 permitted by the Federal Rules of Civil Procedure, that specific documents, the production of which
10 is called for by the document request to Defendants or the subpoena to Simpson Thacher, should not
11 be produced on any other grounds that were properly set forth in Defendants' and Simpson
12 Thacher's Objections to the document request and the subpoena.

13 **IT IS SO ORDERED.**

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15 Dated: _____, 2008

16 Hon. William Alsup
17 United States District Judge

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