IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

ARTHUR L. BRASHER, et al.,)
Plaintiffs,))) Case No. 11-CV-0991
v. BROADWIND ENERGY, INC., et al.,) Honorable James B. Zagel
Defendants.))

NOTICE OF MOTION

PLEASE TAKE NOTICE that on November 20, 2012, at 10:15 a.m., or as soon thereafter as counsel may be heard, we shall appear before the Honorable James B. Zagel, or any judge sitting in his stead, in Courtroom 2503 of the United States District Court for the Northern District of Illinois, Eastern Division, 219 South Dearborn Street, Chicago, Illinois, and then and there present Defendants' Motion for Protective Order, a copy of which has been served on you.

Respectfully submitted,

Date: November 1, 2012

<u>/s/ James W. Ducayet</u> James W. Ducayet Kristen R. Seeger Meredith Jenkins Laval SIDLEY AUSTIN LLP One South Dearborn Street Chicago, Illinois 60603 Tel: (312) 853-7000

Counsel for Broadwind Energy, Inc. and J. Cameron Drecoll

CERTIFICATE OF SERVICE

I, James W. Ducayet, one of Broadwind Energy, Inc.'s attorneys, hereby certify that on November 1, 2012, service of the foregoing Notice of Motion was accomplished pursuant to ECF as to Filing Users and in compliance with LR 5.5 as to any party who is not a Filing User or represented by a Filing User.

> /s/ James W. Ducayet James W. Ducayet