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 March 14, 2013, at 9:30 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 the Joint Motion for Preliminary Approval of Settlement, a copy of which has been served on you.

Date: March 11, 2013.

Respectfully submitted,

/s/ William B. Federman William B. Federman FEDERMAN & SHERWOOD 10205 N. Pennsylvania Avenue Oklahoma City, OK 73120 (405) 235-1560

Lead Counsel for Plaintiffs

James T. Crotty JAMES T. CROTTY & ASSOCIATES 208 S. LaSalle St., Suite 1750 Chicago, IL 60604 (312) 623-1599

Liaison Counsel for Plaintiffs

Samuel H. Rudman Joseph Russello ROBBINS GELLER RUDMAN & DOWD LLP 58 South Service Road, Suite 200 Melville, NY 11747 (631) 367-7100

Counsel for Plaintiffs

/s/James W. Ducayet James W. Ducayet Kristen R. Seeger Meredith Jenkins Laval SIDLEY AUSTIN LLP One South Dearborn Street Chicago, Illinois 60603

Counsel for Defendants

Tel: (312) 853-7000

CERTIFICATE OF SERVICE

I, James W. Ducayet, one of Broadwind Energy, Inc.'s attorneys, hereby certify that on March 11, 2013, 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