

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

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

**SUPPLEMENTAL MEMORANDUM OF LAW IN SUPPORT OF
FINAL APPROVAL OF PROPOSED SETTLEMENT AND REQUEST
FOR AN AWARD OF ATTORNEYS’ FEES, REIMBURSEMENT OF
EXPENSES, AND REIMBURSEMENT AWARD**

Court-appointed Lead Plaintiff¹ Brian M. Grothues (“Lead Plaintiff”), by and through his undersigned counsel, hereby submits this Supplemental Memorandum of Law in Support of the Motion for Final Approval of Proposed Class Action Settlement and Request for an Award of Attorneys’ Fees, Reimbursement of Expenses, and Reimbursement Award.

On March 14, 2013, the Court preliminarily approved the Settlement, certified the Settlement Class for the purposes of effectuating the Settlement, and appointed Grothues as Lead Plaintiff and class representative (“Preliminary Approval Order”). Dkt. No. 133. Pursuant to the Preliminary Approval Order, a total of 21,824 copies of the Notice packet were mailed to potential Class Members or their brokerage firms and other nominees. Lead Plaintiff timely filed

¹ This Court initially appointed Jerry Pehlke, Jr. (“Pehlke”) as Lead Plaintiff and approved his selection of Lead Counsel and Liaison Counsel, James T. Crotty & Associates, by Order dated July 7, 2011. On November 26, 2012, the Court granted Pehlke’s Motion to Withdraw as Lead Plaintiff (Dkt. No. 116). For purposes of this Settlement only, Plaintiff Brian M. Grothues (“Grothues”) and Defendants Broadwind Energy, Inc. (“Broadwind” or the “Company”) and J. Cameron Drecoll (“Drecoll”), the Company’s former Chief Executive Officer (collectively the “Parties”), have agreed, subject to the approval of this Court, that Grothues should be appointed Lead Plaintiff. On March 14, 2013, the Court preliminarily approved the Settlement, certified the Settlement Class for the purposes of effectuating the Settlement, and appointed Grothues as Lead Plaintiff and class representative (Dkt. No. 133).

his Memorandum of Law in Support of the Motion for Final Approval of Proposed Class Action Settlement and Approval of Plan of Allocation and their Memorandum of Law in Support of Plaintiffs' Unopposed Motion for Award of Attorneys' Fees, Reimbursement of Litigation Expenses, and Reimbursement Award on May 28, 2013. Dkt. Nos. 134 and 135.

The Preliminary Approval Order required any Class Member wishing to object to the Settlement to do so by June 7, 2013 and required that any Class Member wishing to request exclusion from the Class must do so by June 3, 2013. The deadlines to object or opt out of the Settlement have now passed. Lead Plaintiff is pleased to advise the Court that no Class Member has objected to the proposed Settlement, the Plan of Allocation, or the request for attorneys' fees, reimbursement of litigation expenses, or reimbursement award. Additionally, only one investor out of the approximately 22,000 Class Members who were mailed a copy of the Notice has requested exclusion from the Class. *See* Exhibit 1, attached hereto. The absence of any objections and the receipt of only one request for exclusion confirm the reasonableness of all aspects of the proposed Settlement.

Dated: June 18, 2013

Respectfully submitted,

s/William B. Federman

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CERTIFICATE OF SERVICE

This is to certify that on June 18, 2013, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

s/William B. Federman