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.)
) Honorable James B. Zagel
BROADWIND ENERGY, INC., et al.,)
Defendants.)))

JOINT STIPULATION REGARDING SCHEDULING

The parties to this action, by their undersigned counsel and subject to the approval of the Court, hereby stipulate as follows:

- 1. Plaintiffs Arthur Brasher, Jerry Pehlke, Jr., and Brian M. Grothues filed an Amended Class Action Complaint for Violation of the Federal Securities Laws in the above-captioned action on September 13, 2011 (the "Amended Complaint").
- 2. On November 2, 2011, (Dkt. 60), the Court granted the parties' previous stipulation regarding scheduling and page limits for motions to dismiss.
- 3. On November 18, 2011, Defendants filed motions to dismiss the Complaint pursuant to Fed. R. Civ. P. 12(b)(6), which challenge whether Plaintiffs have stated a claim for the substantive causes of action alleged against the respective Defendants in the Complaint. Broadwind, the Officer Defendants, and the Director Defendants filed one collective brief, and the Tontine Defendants filed one collective brief.
- 4. The scheduling order previously entered by the Court on November 2, 2011 (Dkt. 60) provides for Plaintiffs' response to the motions to dismiss to be filed 49 days after the filing of the motions, which is January 6, 2012.

5. The undersigned counsel, subject to the approval of the Court, have agreed and stipulated that the briefing scheduled previously entered on November 2, 2011 (Dkt. 60) be modified as follows:

- a. Plaintiffs' responses to Defendants' motions to dismiss shall be filed within 63 days of the filing of Defendants' motions to dismiss, on or before January 20, 2012.
- b. Defendants' reply briefs in support of their motions to dismiss shall be filed within 30 days of the filing of Plaintiffs' responses, on or before February 20, 2012.

Pursuant to the Court's Case Management Procedures, a copy of this Stipulation Regarding Scheduling is being submitted to the Court via email.

Respectfully submitted,

Date: December 23, 2011

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

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

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

Date: December 23, 2011	/s/Kristen Seeger
	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, the Officer
	Defendants, and the Director
	Defendants
Date: December 23, 2011	/s/ John Conroy Martin
	John Conroy Martin
	LAW OFFICES OF JOHN C. MARTIN
	30 North LaSalle Street, #3400
	Chicago, Illinois 60602
	Tel: (312) 368-9000
	Gary Stein
	Michael G. Cutini
	SCHULTE ROTH & ZABEL LLP
	919 Third Avenue
	New York, New York 10022
	Tel: (212) 756-2441
	Counsel for the Tontine Defendants
IT IS SO ORDERED.	
	Honorable James B. Zagel
	United States District Court Judge

CERTIFICATE OF SERVICE

I, Jennifer S. Montagna, one of Plaintiffs' attorneys, hereby certify that on December 23, 2011, service of the foregoing Joint Stipulation Regarding Scheduling 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/Jennifer S. Montagna