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 MOTION FOR ENTRY OF ORDER ENLARGING PAGE LIMITS FOR CLASS CERTIFICATION BRIEFING

Plaintiffs Jerry Pehlke, Jr. and Brian M. Grothues ("Plaintiffs"), Defendant Broadwind Energy, Inc. ("Broadwind"), and Defendant J. Cameron Drecoll ("Drecoll") hereby move this Court for an order enlarging the page limits for the briefs related to class certification. In support of this motion, the parties represent as follows:

- 1. Plaintiffs 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 18, 2011, Defendants moved to dismiss the claims asserted in the Amended Complaint. By Order dated April 19, 2012, this Court granted in part and denied in part Defendants' motion, and sustained a portion of Plaintiffs' claims. *See* Dkt. No. 84.
- 3. On May 14, 2012, the parties filed a Joint Preliminary Report and Discovery Plan. *See* Dkt. No. 87. Pursuant to that proposed discovery plan, the parties proposed a deadline of June 22, 2012, for Plaintiffs to file a motion for class certification. Although the Court has not entered any of the proposed deadlines, Plaintiffs plan to file their motion for class certification on June 22, 2012.

4. Local Rule 7.1 provides that, unless otherwise permitted by this Court, all briefs

in support of or in opposition to motions shall be limited to fifteen (15) pages.

5. Although the parties have agreed to keep their briefs in support of and in

opposition to the motion for class certification as concise as possible, they also agree that the

motion for class certification raises a number of issues that cannot be adequately addressed

within the 15-page limitation of Local Rule 7.1. Accordingly, the parties agree that extending the

page limitations would assist the Court in deciding the issues that will be raised in the

forthcoming motion.

6. The undersigned counsel request that the page limitation of Local Rule 7.1 be

modified as follows: a) the brief in support of Plaintiffs' motion for class certification shall be no

longer than twenty (20) pages; and b) Defendants' brief in opposition to Plaintiffs' motion for

class certification shall be no longer than twenty (20) pages.

WHEREFORE, the parties respectfully request that this Court enter an order enlarging

the page limits to permit the briefs in support of and opposition to class certification be up to

twenty pages.

Respectfully submitted,

Date: June 20, 2012

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2

Date: June 20, 2012

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CERTIFICATE OF SERVICE

I, William B. Federman, one of Plaintiffs' attorneys, hereby certify that on June 20, 2012, service of the foregoing Joint Motion for Entry of Order Enlarging Page Limits for Class Certification Briefing 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/ William B. Federman