

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re:

ENERGY CONVERSION DEVICES, INC.,
et al.,¹

Debtors.

Chapter 11

Case No. 12-43166
(Jointly Administered)

Hon. Thomas J. Tucker

**STIPULATION REGARDING OBJECTION TO THE:
(A) RIGHTS GRANTED TO ENERGY CONVERSION DEVICES, INC. (“ECD”)
UNDER CASH COLLATERAL ORDER WITH RESPECT TO THE PRE-PETITION
SECURED CLAIM AND THE GRANTING OF POSTPETITION REPLACEMENT
LIENS TO ECD; (B) SCHEDULED PRE-PETITION GENERAL UNSECURED CLAIM
AND PRE-PETITION SECURED CLAIM OF ECD AGAINST UNITED SOLAR
OVONIC LLC (“USO”); AND (C) POST-PETITION UNSECURED CLAIMS OF ECD
FOR POST-PETITION ADVANCES MADE TO USO**

Energy Conversion Devices, Inc. (“ECD”) and United Solar Ovonic LLC (“USO”), as debtors and debtors in possession in the above-captioned chapter 11 cases (collectively the “Debtors”), by and through their counsel, Honigman Miller Schwartz and Cohn LLP and their USO conflict counsel, Schafer and Weiner, PLLC, together with the undersigned parties, stipulate to entry of the Order attached as Exhibit 1, and respectfully request that the Court enter the proposed order and grant such other relief as is proper and just.

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¹ The Debtors in these jointly-administered cases are Energy Conversion Devices, Inc. (Case No. 12-43166) and United Solar Ovonic LLC (Case No. 12-43167).



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Exhibit 1 To The Stipulation

Proposed Order

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:

**ENERGY CONVERSION DEVICES, INC.,
et al.¹,**

Debtors.

Chapter 11

Case No. 12-43166
(Jointly Administered)

Judge Thomas J. Tucker

**ORDER SETTING HEARING REGARDING OBJECTION TO THE:
(A) RIGHTS GRANTED TO ENERGY CONVERSION DEVICES, INC. (“ECD”)
UNDER CASH COLLATERAL ORDER WITH RESPECT TO THE PRE-PETITION
SECURED CLAIM AND THE GRANTING OF POSTPETITION REPLACEMENT
LIENS TO ECD; (B) SCHEDULED PRE-PETITION GENERAL UNSECURED CLAIM
AND PRE-PETITION SECURED CLAIM OF ECD AGAINST UNITED SOLAR
OVONIC LLC (“USO”); AND (C) POST-PETITION UNSECURED CLAIMS OF ECD
FOR POST-PETITION ADVANCES MADE TO USO**

This matter having come on to be considered upon the *Objection to the: (A) Rights Granted to Energy Conversion Devices, Inc. (“ECD”) Under Cash Collateral Order with respect to the Pre-petition Secured Claim and the Granting of Post-petition Replacement Liens to ECD; (B) Scheduled Pre-petition General Unsecured Claim and Pre-Petition Secured Claim of ECD Against United Solar Ovonic LLC (“USO”); and (C) Post-petition Unsecured Claims of ECD for Post-petition Advances Made to USO* [Docket No. 662] (the “**Objection**”), and the Stipulation Regarding Objection to the: (A) Rights Granted to Energy Conversion Devices, Inc. (“ECD”) Under Cash Collateral Order with respect to the Pre-petition Secured Claim and the Granting of Post-petition Replacement Liens to ECD; (B) Scheduled Pre-petition General Unsecured Claim and Pre-Petition Secured Claim of ECD Against United Solar Ovonic LLC (“USO”); and (C) Post-petition Unsecured Claims of ECD for Post-petition Advances Made to

¹ The Debtors in these jointly-administered cases are Energy Conversion Devices, Inc. (Case No. 12-43166) and United Solar Ovonic LLC (Case No. 12-43167).

USO [Docket No. _____] among the parties thereto agreeing to stay the proceedings relating to the Objection pending the outcome of the voting on the Second Amended Joint Plan of Liquidation of Energy Conversion Devices, Inc. and United Solar Ovonic LLC [Docket No. 611] (as amended, modified or supplemented from time to time, the “**Plan**”). No further notice or hearing being necessary, the Court being fully advised in the premises, and capitalized terms not defined herein having the meanings as defined in the Objection;

IT IS HEREBY ORDERED that:

1. Provided that the Plan has not become effective, the hearing on the Objection shall be on **August 15, 2012 at 12:00 noon**.

2. Provided that the Plan has not become effective, parties may file a response to the Objection no later than **August 9, 2012**.

3. All other actions relating to the Objection, including discovery, are stayed through August 15, 2012.

4. If the Plan becomes effective and the Debtors’ estates are substantively consolidated, the Objection shall be withdrawn.

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