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7 Attorneys for Defendants
 SKS OCULAR, LLC, SKS OCULAR 1, LLC,
 8 JASON SLAKTER, GLENN STOLLER

9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA
 11 SAN FRANCISCO DIVISION

12 JEANMARIE GUENOT,
 13 Plaintiff,
 14 v.
 15 SKS OCULAR, LLC, a Delaware limited
 16 liability company; SKS OCULAR 1, LLC, a
 Delaware limited liability company; JASON
 17 SLAKTER, an individual; GLENN STOLLER,
 an individual; and DOES 1-10, inclusive,
 18 Defendants.

CASE NO.: CV 13 1875 (SI)
**JOINT STIPULATION AND
 [PROPOSED] ORDER EXTENDING
 BRIEFING SCHEDULE RE
 PLAINTIFF'S MOTION FOR
 PARTIAL SUMMARY JUDGMENT
 AND FOR MODIFICATION OF
 PRETRIAL PREPARATION
 ORDER**

Before: The Honorable Susan Illston
 Complaint Filed: April 24, 2013
 Trial Date: None Set

22 SKS OCULAR, LLC, a Delaware limited
 liability company
 23 Counter-Plaintiff,
 24 v.
 25 JEANMARIE GUENOT,
 26 Counter-Defendant.

1 Defendants SKS Ocular, LLC; SKS Ocular 1, LLC; Jason Slakter; and Glenn Stoller
2 (“Defendants”) and Plaintiff Jeanmarie Guenot (“Plaintiff”) (collectively referred to herein as the
3 “Parties”), by and through their undersigned counsel, hereby jointly enter into the following
4 Stipulation:

5 WHEREAS, Plaintiff filed a Motion for Partial Summary Judgment (the “Motion”) on
6 November 26, 2013;

7 WHEREAS, the Parties entered into a stipulation dated December 4, 2013 and entered by
8 the Court on December 5, 2013, which extended the briefing scheduling for the Motion;

9 WHEREAS, SKS Ocular, LLC and SKS Ocular 1, LLC’s 30(b)(6) designee is
10 unavailable to be deposed on the date Plaintiff selected and Plaintiff is unavailable on the date
11 that the designee offered to appear;

12 WHEREAS, the first mutually agreeable date to reschedule this deposition is January 31,
13 2014;

14 WHEREAS, the Parties have agreed to further extend the briefing schedule for the
15 Motion so that Plaintiff may have the 30(b)(6) deposition testimony in preparing her Reply brief
16 to the Motion; and

17 WHEREAS, the Parties have agreed to further extend the deadline by which to complete
18 non-expert discovery, currently set for March 3, 2014, to March 14, 2014, so that, following the
19 deposition of the corporate defendants’ 30(b)(6) designee, any further discovery may be timely
20 issued prior to the deadline.

21 IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned,
22 subject to approval of the Court, that:

- 23 1. The 30(b)(6) witness of the corporate defendants will be produced for deposition in
24 New York, New York on January 31, 2014.
- 25 2. Defendants’ Opposition to Motion for Partial Summary Judgment must be filed by
26 January 22, 2014 and will be served electronically and by overnight delivery.
- 27 3. Plaintiff’s Reply brief must be filed by February 10, 2014 and will be served
28 electronically and by overnight delivery.

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- 4. The hearing on Plaintiff's Motion for Partial Summary Judgment shall be held at the convenience of the Court following the completion of the briefing on the Motion.
- 5. The deadline for completion of non-expert discovery shall be extended to March 14, 2014.

Dated: January 15, 2014

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

By: /s/ Koray J. Bulut
Koray J. Bulut

Attorneys for Defendants
SKS OCULAR, LLC, SKS OCULAR 1,
LLC, JASON SLAKTER, and GLENN
STOLLER

Dated: January 15, 2014

SV EMPLOYMENT LAW FIRM

By: /s/ Kevin A. Mills
Kevin A. Mills
Attorneys for Plaintiff
JEANMARIE GUENOT

Based upon the above stipulation and for good cause appearing, IT IS SO ORDERED.

Dated: 1/15, 2014

By: 
HONORABLE SUSAN ILLSTON
United States District Court

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14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN FRANCISCO DIVISION

17 JEANMARIE GUENOT,

18 Plaintiff,

19 v.

20 SKS OCULAR, LLC, a Delaware limited
21 liability company; SKS OCULAR 1, LLC, a
22 Delaware limited liability company; JASON
23 SLAKTER, an individual; GLENN STOLLER,
24 an individual; and DOES 1-10, inclusive,

25 Defendants.

26 SKS OCULAR, LLC, a Delaware limited
27 liability company

28 Counter-Plaintiff,

v.

JEANMARIE GUENOT,

Counter-Defendant.

CASE NO.: CV 13 1875 (SI)

**DECLARATION OF KORAY J.
BULUT PURSUANT TO CIV. L. R.
CIV. 6-2**

Before: The Honorable Susan Illston

Complaint Filed: April 24, 2013
Trial Date: None Set

1 KORAY J. BULUT declares pursuant to 28 U.S.C. 1746 and Civil Local Rule 6-2(a) as follows:

2 1. Plaintiff Jeanmarie Guenot (“Plaintiff”) wishes to take the deposition of the
3 corporate defendants’ 30(b)(6) designee prior to filing her Reply brief in support of her Motion for
4 Partial Summary Judgment (the “Motion”). The designee, Dr. Jason Slakter, is unavailable on the
5 date Plaintiff selected and Plaintiff is unavailable on the date on which Dr. Slakter offered to
6 appear. The first mutually agreeable date for the deposition is January 31, 2014.

7 2. Defendants SKS Ocular, LLC, SKS Ocular 1, LLC, Jason Slakter, and Glenn
8 Stoller (“Defendants”) and Plaintiff have therefore agreed to a further extension of the briefing
9 schedule on the Motion.

10 3. Plaintiff asked to extend the time to complete non-expert discovery from March 3,
11 2014 to March 14, 2014 so that, following the deposition of the corporate defendants’ 30(b)(6)
12 designee, any further discovery may be timely issued prior to the fact discovery cut-off date.

13 4. The Parties have proposed one previous modification of the non-expert discovery
14 completion deadline set forth in the Court’s Pretrial Preparation Order—from February 14, 2014
15 to March 3, 2014—which was granted by the Court on December 5, 2013.

16 5. The only effect on the case schedule that the proposed enlargement of time will
17 have is on the date for the completion of non-expert discovery. All other dates remain the same.

18 Dated: January 15, 2014

19 /s/Koray J. Bulut
20 Koray J. Bulut

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