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*Co-Lead Counsel for Plaintiffs*

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

NORFOLK COUNTY RETIREMENT  
SYSTEM, Individually and on Behalf of All  
Others Similarly Situated,

Plaintiff,

vs.

SOLAZYME, INC., et al.,

Defendants.

) Case No. 3:15-cv-02938-HSG

) CLASS ACTION

) STIPULATION AND ~~PROPOSED~~  
) SCHEDULING ORDER

Pursuant to Civil Local Rule 7-12, the parties, Norfolk County Retirement System (“Norfolk”), John Medlin, John Hussain, Nancy Ackels and Leonardo Fernandez (collectively, “Solazyme Investors” or “Lead Plaintiffs”) and Solazyme, Inc. (“Solazyme”), Jonathan S. Wolfson, Tyler W. Painter, David C. Cole, Jerry Fiddler, Michael V. Arbige, Ian T. Clark, Peter Kovacs, James R. Craigie, Goldman, Sachs & Co. and Morgan Stanley & Co, LLC (collectively, “Defendants”), by and through their undersigned counsel of record, submit the following stipulation and proposed order:

WHEREAS, on September 4, 2015, the Court granted plaintiff Norfolk and Defendants’ Stipulation Extending Defendants’ Response Deadline Pending Appointment of Lead Plaintiff and Lead Counsel and Vacating Initial Case Management Conference. Dkt. No. 44;

WHEREAS, on October 8, 2015, the Court held a hearing on motions to appoint lead plaintiff and lead counsel and took such motion under submission. Dkt. No. 65;

WHEREAS, on October 8, 2015, the Court issued a written order granting the Solazyme Investors’ motion for appointment as Lead Plaintiff and approved its selection of Glancy Prongay & Murray LLP and Labaton Sucharow LLP to serve as co-Lead Counsel, as well as Robbins Geller Rudman & Dowd LLP to serve as Liaison Counsel. Dkt. No. 64; and

WHEREAS, the parties have met and conferred and Lead Plaintiffs have indicated that they intend to file an amended complaint.

The parties have further agreed on a schedule for the filing of such complaint, a date by which Defendants shall file a motion to dismiss or otherwise respond to the complaint, and in the event Defendants file a motion to dismiss, the parties have conferred and agreed on a briefing schedule which accommodates the complexity of this securities action and the parties’ and their counsel’s respective schedule.

NOW THEREFORE, the parties hereby agree and stipulate to the following deadlines and briefing schedule:

1. Lead Plaintiffs shall file an amended complaint no later than December 15, 2015;
2. Defendants’ response to the amended complaint shall be filed on or before February 12, 2016;

1           3.       Lead Plaintiffs' opposition to Defendants' response shall be filed on or before March  
2 25, 2016;

3           4.       Defendants' reply shall be filed on or before April 22, 2016; and

4           5.       The hearing on Defendants' anticipated motion to dismiss shall be set for May 12,  
5 2016 at 2:00 p.m., or a date thereafter that is convenient for the Court.

6  
7 DATED: November 5, 2015

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*Co-Lead Counsel for Plaintiffs*

1 DATED: November 5, 2015

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12 DATED: November 5, 2015

13 SIMPSON THACHER & BARTLETT LLP  
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23 Attorneys for Defendants Goldman, Sachs & Co.  
24 and Morgan Stanley & Co., LLC

25 I, Willow E. Radcliffe, am the ECF User whose ID and password are being used to file this  
26 Stipulation and [Proposed] Scheduling Order. In compliance with Civil Local Rule 5-1(i)(3), I  
27 hereby attest that Mark R. S. Foster and James G. Kreissman have concurred in this filing.  
28

26 s/ WILLOW E. RADCLIFFE  
WILLOW E. RADCLIFFE


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\* \* \*

**ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 11/9/2015

  
THE HON. HAYWOOD S. GILLIAM, JR.  
UNITED STATES DISTRICT JUDGE

1 CERTIFICATE OF SERVICE

2 I hereby certify that on November 5, 2015, I authorized the electronic filing of the foregoing  
3 with the Clerk of the Court using the CM/ECF system which will send notification of such filing to  
4 the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I  
5 caused to be mailed the foregoing document or paper via the United States Postal Service to the non-  
6 CM/ECF participants indicated on the attached Manual Notice List.

7 I certify under penalty of perjury under the laws of the United States of America that the  
8 foregoing is true and correct. Executed on November 5, 2015.

9 s/ WILLOW E. RADCLIFFE  
10 WILLOW E. RADCLIFFE

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