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Liaison Counsel for Plaintiffs and the Putative Class

[Additional Counsel Listed on Signature Page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

NORFOLK COUNTY RETIREMENT SYSTEM,
JOHN MEDLIN, JOHN HUSSAIN, LEONARDO
FERNANDEZ, JAMES ACKELS and NANCY
ACKELS, Individually and on Behalf of All
Others Similarly Situated,

Plaintiffs,

v.

SOLAZYME, INC., 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,

Defendants.

LABATON SUCHAROW LLP

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Mark S. Arisohn (*pro hac vice*)
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*Co-Lead Counsel for Plaintiffs
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Case No. 3:15-cv-02938-HSG

**STIPULATION AND ORDER REGARDING
THE PAGE LIMITATION FOR LEAD
PLAINTIFFS' OMNIBUS OPPOSITION TO
DEFENDANTS' MOTIONS TO DISMISS**

1 WHEREAS, this action for violations of the federal securities laws was filed against defendants
2 Solazyme, Inc., Jonathan S. Wolfson, Tyler W. Painter, David C. Cole, Jerry Fiddler, Michael V.
3 Arbige, Ian T. Clark, Peter Kovacs, James R. Craigie, (“Solazyme Defendants”) Goldman, Sachs &
4 Co., and Morgan Stanley & Co. LLC (“Underwriter Defendants”), (collectively “Defendants”);
5

6 WHEREAS, on October 8, 2015, the Court entered an order appointing plaintiffs John Medlin,
7 John Hussain, Norfolk County Retirement System, Nancy Ackels, and Leonardo Fernandez as lead
8 plaintiffs (“Lead Plaintiffs”);
9

10 WHEREAS, on November 9, 2015, the Court entered a scheduling order that provided that Lead
11 Plaintiffs were to file a consolidated complaint no later than December 15, 2015, Defendants were to
12 file a response to the complaint no later than February 12, 2016, Lead Plaintiffs were to file any
13 opposition to Defendants’ response no later than March 25, 2016, and Defendants were to file any reply
14 no later than April 22, 2016;
15

16 WHEREAS, on December 15, 2015, Lead Plaintiffs filed their Consolidated Class Action
17 Complaint for Violations of the Federal Securities Laws (“Consolidated Complaint”);
18

19 WHEREAS, on February 12, 2016, the Solazyme Defendants and the Underwriter Defendants
20 filed separate briefs moving to dismiss the Consolidated Complaint;
21

22 WHEREAS, the motion to dismiss filed by the Solazyme Defendants is 25-pages in length and
23 the motion to dismiss filed by the Underwriter Defendants is 14-pages in length;
24

25 WHEREAS, Lead Plaintiffs intend to file an omnibus opposition to both motions to dismiss for
26 purposes of efficiency and to avoid the repetition of argument;
27

28 WHEREAS, Lead Plaintiffs believe that the 25-page limitation of Local Rule 7-3 will not afford
Lead Plaintiffs sufficient opportunity to respond to the arguments contained within both motions to
dismiss;

1 WHEREAS, counsel for the parties have met and conferred, and counsel for Defendants do not
2 oppose a page limitation of 35 pages for Lead Plaintiffs' omnibus opposition to Defendants' motions to
3 dismiss;

4 NOW THEREFORE, the parties hereby agree and stipulate to the following:

5
6 1. Lead Plaintiffs shall have up to, and including, 35-pages for their omnibus opposition to
7 Defendants' motions to dismiss.

8
9 Dated: March 22, 2016

GLANCY PRONGAY & MURRAY LLP

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*Liaison Counsel for Plaintiffs and the Putative
Class*

Dated: March 22, 2016

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Kovacs, and James R. Craigie*

1 Dated: March 22, 2016

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11 *Attorneys for Defendants Goldman, Sachs & Co.*
12 *and Morgan Stanley & Co. LLC*

13 **ATTESTATION**

14 I, Ex Kano S. Sams II, am the ECF User whose identification and password are being used to
15 file this **STIPULATION AND [PROPOSED] ORDER REGARDING THE PAGE LIMITATION**
16 **FOR LEAD PLAINTIFFS' OMNIBUS OPPOSITION TO DEFENDANTS' MOTIONS TO**
17 **DISMISS**. In compliance with Civil L.R. 5-1, I hereby attest that Mark R.S. Foster and Simona G.
18 Strauss have concurred in this filing.

19 Dated: March 22, 2016

GLANCY PRONGAY & MURRAY LLP

20 By: s/ Ex Kano S. Sams II

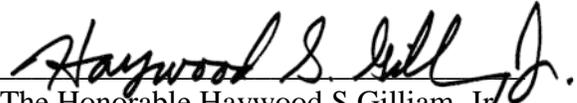
21 Ex Kano S. Sams II

* * *

ORDER

PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

Dated: March 22, 2016


The Honorable Haywood S Gilliam, Jr
United States District Judge

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