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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.

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

**STIPULATION AND ORDER REGARDING
FILING OF AMENDED COMPLAINT AND
BRIEFING SCHEDULE FOR MOTION(S)
TO DISMISS**

1 WHEREAS, this action for violations of the federal securities laws was filed against defendants
2 Solazyme, Inc. (now called TerraVia, Inc.), Jonathan S. Wolfson, Tyler W. Painter, David C. Cole,
3 Jerry Fiddler, Michael V. Arbige, Ian T. Clark, Peter Kovacs, James R. Craigie, (“Solazyme
4 Defendants”) Goldman, Sachs & Co., and Morgan Stanley & Co. LLC (“Underwriter Defendants”),
5 (collectively “Defendants”);
6

7 WHEREAS, on October 8, 2015, the Court entered an order appointing plaintiffs John Medlin,
8 John Hussain, Norfolk County Retirement System, Nancy Ackels, and Leonardo Fernandez as lead
9 plaintiffs (“Lead Plaintiffs”);
10

11 WHEREAS, Lead Plaintiffs filed a Consolidated Class Action Complaint and Defendants filed
12 motions to dismiss the complaint;

13 WHEREAS, on December 29, 2016, the Court issued an Order granting Defendants’ motions to
14 dismiss with leave to amend, and set January 26, 2017 as the deadline to file an amended complaint;

15 WHEREAS, Plaintiffs have requested additional time to file their First Amended Complaint;

16 WHEREAS, counsel for the parties have conferred regarding a mutually-agreeable schedule for
17 the filing of the amended complaint and for briefing of Defendants’ anticipated motion(s) to dismiss;
18

19 NOW THEREFORE, subject to the approval of the Court, the parties hereby agree and stipulate
20 to the following:

- 21 1. Lead Plaintiffs shall file an amended complaint on or before February 15, 2017;
- 22 2. Any motion(s) to dismiss the amended complaint shall be filed on or before March 17,
23 2017;
- 24 3. Lead Plaintiffs’ opposition to Defendants’ motion(s) to dismiss shall be filed on or
25 before April 17, 2017;
- 26 4. Defendants’ reply in support of any motion(s) to dismiss shall be filed on or before May
27 17, 2017; and
28

1 5. The hearing on Defendants' motion(s) to dismiss will be held on June 1, 2017, at 2:00
2 p.m., or on such other day and time as set by the Court.

3 Dated: January 19, 2017

GLANCY PRONGAY & MURRAY LLP

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Class

1 Dated: January 19, 2017

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15 *S. Wolfson, Tyler W. Painter, David C. Cole, Jerry*
16 *Fiddler, Michael V. Arbige, Ian T. Clark, Peter*
17 *Kovacs, and James R. Craigie*

18 Dated: January 19, 2017

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

1 **ATTESTATION**

2 I, Ex Kano S. Sams II, am the ECF User whose identification and password are being used to
3 file this **STIPULATION AND [PROPOSED] ORDER REGARDING FILING OF AMENDED**
4 **COMPLAINT AND BRIEFING SCHEDULE FOR MOTION(S) TO DISMISS.** In compliance
5 with Civil L.R. 5-1, I hereby attest that Mark R.S. Foster and Simona G. Strauss have concurred in this
6 filing.

7
8 Dated: January 19, 2017

GLANCY PRONGAY & MURRAY LLP

9
10 By: s/ Ex Kano S. Sams II
11 Ex Kano S. Sams II

12 * * *

13
14
15 ORDER

16
17 PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

18
19
20 Dated: January 20, 2017


The Honorable Haywood S Gilliam, Jr.
United States District Judge