

1 GREGORY S. GILCHRIST (Cal. Bar No. 111536)
 RYAN BRICKER (Cal. Bar No. 269100)
 2 SOPHY J. TABANDEH (Cal. Bar No. 287583)
 PAYMANEH PARHAMI (Cal. Bar No. 335604)
 3 VERSO LAW GROUP LLP
 565 Commercial Street, 4th Fl.
 4 San Francisco, CA 94111
 Telephone: (415) 534-0495
 5 Email: greg.gilchrist@versolaw.com
 ryan.bricker@versolaw.com
 6 sophy.tabandeh@versolaw.com
 paymaneh.parhami@versolaw.com

7 *Attorneys for Respondent*
 8 *Sequoia Capital Operations LLC*

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

11 EMPOWER ANNUITY INSURANCE
 12 COMPANY OF AMERICA,

13 Movant,

14 v.

15 SEQUOIA CAPITAL OPERATIONS LLC

16 Respondent.

Case No.: 3:24-mc-80061

**STIPULATED REQUEST EXTENDING
 BRIEFING SCHEDULE AND HEARING DATE
 PURSUANT TO L.R. 6-2 RE EMPOWER
 ANNUITY INSURANCE COMPANY OF
 AMERICA’S MOTION TO COMPEL SEQUOIA
 CAPITAL OPERATIONS LLC TO COMPLY
 WITH SUBPOENA; ORDER AS MODIFIED**

18 Plaintiff Empower Annuity Insurance Company of America (“Annuity”) and Respondent
 19 Sequoia Capital Operations LLC (“Sequoia”), by and through their counsel of record, hereby stipulate
 20 as follows:

21 1. On March 13, 2024, Annuity filed its Motion to Compel Sequoia to Comply with

22 *Empower Annuity Insurance Company of America v. Sequoia Capital Operations, LLC*
 Subpoena,

Doc. 13

23 2. Under the current briefing scheduled (Dkt. 5), Sequoia’s Response to the Motion to
 24 Compel is due on March 27, 2024 and Annuity’s optional reply on April 3, 2024. The hearing is
 25 scheduled for April 16, 2024.

26 3. Annuity and Sequoia are continuing to meet and confer about the Subpoena to
 27 determine whether they can resolve the matter without court intervention;
 28

1 4. To allow the parties additional time to confer, the parties stipulate to extend the briefing
2 schedule and hearing date as follows:

3 Sequoia’s Response: April 3, 2024

4 Annuity’s Optional Reply: April 10, 2024

5 Hearing Date: May 7, 2024 at 1:30 p.m. via Zoom Webinar

6 5. This is the first request for a time modification in this matter.

7 Dated: March 26, 2024

Respectfully submitted,

8 **VERSO LAW GROUP LLP**

9 /s/ Sophy J. Tabandeh

10 Gregory S. Gilchrist

11 Ryan Bricker

12 Sophy J. Tabandeh

13 Paymaneh Parhami

14 Attorneys for Respondent

15 Sequoia Capital Operations LLC

16 Dated: March 26, 2024

17 **POLSINELLI LLP**

18 /s/ Miya Yusa

19 Colby B. Springer

20 cspringer@polsinelli.com

21 Miya Yusa

22 myusa@polsinelli.com

23 Three Embarcadero Center, Suite 2400

24 San Francisco, CA 94111

25 T: 415-248-2100

26 Attorneys for Empower Annuity Insurance

27 Company of America

28 **SIGNATURE ATTESTATION**

I attest that concurrence in the filing of this document has been obtained from each of the other signatories, which will serve in lieu of their signatures on the document.

Dated: March 26, 2024

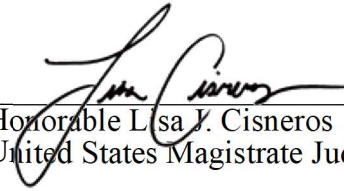
/s/ Sophy J. Tabandeh

Sophy J. Tabandeh

ORDER AS MODIFIED

Good cause appearing, it is hereby **ORDERED**.

Date: March 27, 2024



Honorable Lisa J. Cisneros
United States Magistrate Judge

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28