

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

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GEORGE OUZOUNIAN, P/K/A MADDOX,  
and, JANE DOE,

Index No.: 656779/2017

Plaintiff,

v.

DAX HERRERA P/K/A DICK MASTERSON,  
FOUNDATION DIGITAL, LLC, GREG  
BOSER, LOREN BAKER, CMGRP, INC.,  
D/B/A WEBER SHANDWICK, JOSHUA  
KAUFMAN, ASTERIOS KOKKINOS,  
TREVOR BIRT, PATREON, INC., and  
JORDAN COPE,

**STIPULATION TO EXTEND  
BRIEFING SCHEDULE ON  
DEFENDANTS DAX HERRERA,  
FOUNDATION DIGITAL, LLC,  
AND GREG BOSER’S MOTION TO  
DISMISS**

**(Mot. Seq. No. 002)**

Defendant.

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**WHEREAS**, it was previously agreed by email between counsel for Plaintiffs and Defendants Dax Herrera (“Herrera”), Foundation Digital, LLC (“Foundation”), and Greg Boser (“Boser”) (Collectively “Motion Defendants”), that Motion Defendants time to answer, move or otherwise respond to Plaintiffs’ Complaint was extended from December 28, 2017 to January 2, 2018.

**IT IS HEREBY STIPULATED AND AGREED**, by and between the undersigned, that the currently scheduled Return Date of January 30, 2018 for Motion Defendants Motion to Dismiss Plaintiffs’ Complaint (Mot. Seq. No. 002), is hereby adjourned to February 27, 2018;

**IT IS FURTHER STIPULATED AND AGREED**, by and between the undersigned, that the time for Plaintiffs to serve and file their opposition to Motion Defendants’ Motion to Dismiss is hereby extended up to and including February 12, 2018;

**IT IS FURTHER STIPULATED AND AGREED**, by and between the undersigned, that the time for Motion Defendants to serve and file their Reply is hereby extended up to and including February 26, 2018; and

**IT IS FURTHER STIPULATED AND AGREED**, this Stipulation may be executed in counterparts, and that a facsimile or PDF transmission of this Stipulation shall be binding as though executed in the original.

Dated: New York, New York  
January 18, 2018

THE LANDAU GROUP, P.C.

ADELMAN MATZ P.C.

/s/ Kevin A. Landau



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By: Kevin A. Landau  
*Attorneys for Plaintiffs*  
45 Rockefeller Plaza, Suite 2000  
New York, New York 10111  
Tel: (212) 537-4025

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By: Sarah M. Matz, Esq.  
*Attorneys for Defendants Dax  
Herrera Foundation Digital, LLC,  
and Greg Boser*  
1173A Second Ave., Ste. 153  
New York, New York 10065  
Tel: (646) 650-2213