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8 Attorney for Plaintiff

9 UNITED STATES DISTRICT COURT  
 10 FOR THE EASTERN DISTRICT OF CALIFORNIA  
 11 SACRAMENTO DIVISION

12 ANDY ALLAN MOON,  
 13 Plaintiff,  
 14 v.  
 15 CAROLYN W. COLVIN, Acting  
 16 Commissioner of Social Security,  
 17 Defendant

Case No: 2:14-cv-00861-AC

STIPULATION AND ORDER FOR  
 EXTENSION OF TIME  
 [Fed.R.Civ.P. 6]

18 WHEREAS, Counsel of Record Robert C. Weems requires additional time to draft  
19 the motion for summary judgment motion;

20 WHEREAS, the need for more time is the result of Counsel of Record Robert C.  
21 Weems due to unanticipated demands of his criminal court demands; and

22 WHEREAS, an additional extension of 20 days is appropriate to file Plaintiff's  
 23 motion for summary judgment until March 10, 2016 is required due to limited support  
 24 staff familiar with the case, and is not requested for an improper purpose. See, FRCP 11;  
 25 *Unioil, Inc. v. E.F. Hutton & Co.*, 809 F.2d 548, 558 (9th Cir.1986).

26 NOW, WHEREFORE, the Parties, subject to the Court's approval, stipulate to an  
27 extension of all deadlines in this action. The revised due date for the filing of the motion  
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1 for summary judgment is March 10, 2016. This is Plaintiff's first request for additional  
2 time.

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4 SO STIPULATED AND AGREED:

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6 For Plaintiff:  
WEEMS LAW OFFICES

For Defendant:  
BENJAMIN B. WAGNER  
United States Attorney  
DEBORAH LEE STACHEL  
Acting Regional Chief Counsel,  
Region IX  
Social Security Administration

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10  
11 /s/Robert C. Weems  
12 \_\_\_\_\_  
Robert C. Weems, Attorney for  
13 Plaintiff

By: /s/ Richard Rodriguez  
14 \_\_\_\_\_  
Special Assistant United States  
Attorney and Attorney for the  
15 Defendant (per e-mail)

16 SO ORDERED:

17 DATE: February 22, 2016



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ALLISON CLAIRE  
19 MAGISTRATE JUDGE OF THE  
20 UNITED STATES DISTRICT COURT

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DECLARATION OF CONCURRENCE OF SIGNATURE  
GENERAL ORDER 45, X

I, Robert C. Weems, hereby declare and attest that concurrence in the filing of the document has been obtained from each of the other signatories, or from the single signatory (in the case, e.g., of a declaration) whose signature is indicated by the notation “ /s/ [name of signatory].”<sup>1</sup>

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/s/ Robert C. Weems  
Robert C. Weems

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<sup>1</sup> The filer shall maintain records to support this concurrence for subsequent production for the Court if so ordered or for inspection upon request by a party until one year after final resolution of the action (including appeal, if any) unless filer has attached a scanned image of the signature page(s) of the document being electronically filed in lieu of maintaining the paper record for subsequent production if required.