

1 BENJAMIN B. WAGNER
 United States Attorney
 2 DEBORAH LEE STACHEL – CSBN 230138
 Acting Regional Chief Counsel, Region IX
 3 Social Security Administration
 4 RICHARD M. RODRIGUEZ
 Special Assistant United States Attorney
 5 160 Spear Street, Suite 800
 San Francisco, California 94105
 6 Telephone: (415) 977-8926
 Facsimile: (415) 744-0134
 7 E-Mail: Richard.Rodriguez@ssa.gov

8 Attorneys for Defendant

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

12 ANDY ALLEN MOON,) Case No: 2:14-cv-00861-AC
)
 13 Plaintiff,) STIPULATION AND ORDER TO EXTEND
) TIME
 14 vs.)
)
 15 CAROLYN W. COLVIIN, Acting Commissioner)
 16 of the Social Security Administration,)
)
 17 Defendant.)

18
19 The parties, through their respective counsel, stipulate the time for filing of defendant’s
20 opposition to plaintiff’s opening brief be extended from April 11, 2016, to May 11, 2016.

21 This is Defendant’s first request for an extension of time to file a response to Plaintiff’s
22 opening brief. Defendant needs the additional time to further review the voluminous file in this case in
23 order to properly respond to the issues raised by Plaintiff in his opening brief.

24 Further, the undersigned briefing schedule for the month of April has been exceptionally heavy,
25 and the unexpected assignment of a sensitive employee relations matter has left an insufficient amount
26 of time in which to prepare Defendant’s response.

27 Plaintiff has had one extension of time of 20 days in which to file his opening brief.

28 Plaintiff’s reply brief, shall be filed within 21 days from receipt of Defendant’s response.

Stipulation and Order for Extension of Time

1 Counsel for Defendant conferred with Plaintiff's counsel via email, who has no opposition to
2 the requested extension request on April 7, 2016.

3 Respectfully submitted,

4 Dated: April 7, 2016

5 BENJAMIN B. WAGNER
6 United States Attorney
7 DEBORAH LEE STACHEL, Acting
8 Regional Chief Counsel, Region IX
9 Social Security Administration

10 By: /s/Richard M. Rodriguez
11 RICHARD M. RODRIGUEZ
12 Special Assistant U.S. Attorney

13 Attorneys for Defendant

14 Dated: April 7, 2016

15 /s/Robert C. Weems, CSBN 148156
16 As authorized by email
17 ROBERT C. WEEMS, ESQ.
18 Attorney for Plaintiff

19 **IT IS SO ORDERED:**

20 Dated: April 8, 2016

21 Allison Claire
22 ALLISON CLAIRE
23 UNITED STATES MAGISTRATE JUDGE
24
25
26
27

28 Stipulation and Order for Extension of Time