

1 Geri N. Kahn, Esq., SBN 148536
2 400 Montgomery Street, Suite 810
3 San Francisco, CA 94104
4 Tel. (415) 397-5446
5 Fax (707) 361-0350
6 Email: geri@gerinkahn.com

7 UNITED STATES DISTRICT COURT
8 EASTERN DISTRICT OF CALIFORNIA

9 Sohaila AZIZI,) Case No.: 2:14-cv-01693-CKD
10)
11 Plaintiff,) SECOND STIPULATION TO EXTEND
12 vs.) DUE DATE OF PLAINTIFF'S BRIEF IN
13 Carolyn W. COLVIN, Acting) SUPPORT OF HER MOTION FOR
14 Commissioner of Social Security,) SUMMARY JUDGMENT
15 Defendant.)

16 Plaintiff, by and through her attorney of record, and Defendant, by and through
17 her attorney of record, hereby stipulate, subject to the approval of the Court, to a 30-day
18 extension of time for Plaintiff's counsel to file a brief in support of her Motion for
19 Summary Judgment, in light of the following:

- 20
- 21 1. Plaintiff's counsel has been actively working on the Motion for Summary
22 Judgment. Unfortunately her legal assistant recently left her job and
23 counsel is having to spend time on administrative tasks as well as
24 interviewing potential applicants for a job. Counsel has been unable to
25 complete the brief.

1 2. Plaintiff's counsel has emailed Theophous Reagans, Esq., defendant's
2 counsel. He has indicated that he is agreeable to a 30 day extension of
3 time for counsel to prepare her brief.

4 3. Should the request be granted, Plaintiff's brief will be due on March 26,
5 2015, Defendant's reply brief on April 27, 2015 and Plaintiff's optional
6 response brief on May 18, 2015.

7 Respectfully submitted,

8
9 Dated: February 24, 2015

10 /s/ Geri N. Kahn
11 GERI N. KAHN
12 Attorney for Plaintiff

13 Dated: February 24, 2015

14 /s/ Theophous Reagans
15 Theophous H. Reagans
16 Special Assistant United States Attorney
17 Attorney for Defendant

18 **ORDER**

19 Pursuant to stipulation, IT IS SO ORDERED.

20 Dated: February 26, 2015

21 
22 _____
23 CAROLYN K. DELANEY
24 UNITED STATES MAGISTRATE JUDGE
25