

1 BENJAMIN B. WAGNER
United States Attorney
2 DEBORAH L. STACHEL
Acting Regional Chief Counsel, Region IX
3 Social Security Administration
4 TIMOTHY R. BOLIN, CA SBN 259511
Special Assistant United States Attorney
5 Social Security Administration
Office of the General Counsel
6 160 Spear St Ste 800
7 San Francisco, CA 94105
Telephone: (415) 977-8962
8 Facsimile: (415) 744-0134
Email: timothy.bolin@ssa.gov
9 Attorneys for Defendant

10
11 **UNITED STATES DISTRICT COURT**
12 **EASTERN DISTRICT OF CALIFORNIA**
13 **SACRAMENTO DIVISION**
14

15 EMILYANN RASMUSSEN,) No. 2:15-cv-00079-DAD
16 Plaintiff,)
17 v.) JOINT STIPULATION AND ORDER TO
18) EXTEND DEFENDANT’S TIME TO FILE
19 ACTING COMMISSIONER) CROSS-MOTION FOR
OF SOCIAL SECURITY,) SUMMARY JUDGMENT
20 Defendant.)
21)
22)
23)
24)
25)
26)
27)
28)

1 The parties hereby stipulate, through their undersigned attorneys and subject to the
2 Court's approval, that Defendant shall have an extension of time, up to and including
3 October 30, 2015, in which to file her cross-motion for summary judgment. Defendant requests
4 this extension because of her attorney's inordinately heavy caseload for the months of September
5 and October 2015, including two appellate briefs for the Ninth Circuit Court of Appeals due this
6 month and at least nine district court briefs due in October 2015, as well as the additional
7 workload of contingency planning in case of a government shutdown.

8
9 Respectfully submitted,

10
11 Date: *September 30, 2015*

/s/ Joseph Clayton Fraulob
JOSEPH CLAYTON FRAULOB
Attorney for Plaintiff

12
13
14 Date: *September 30, 2015*

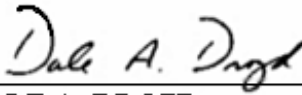
BENJAMIN B. WAGNER
United States Attorney
DEBORAH L. STACHEL
Acting Regional Chief Counsel, Region IX
Social Security Administration

/s/ Timothy R. Bolin
TIMOTHY R. BOLIN
Special Assistant United States Attorney

15
16
17
18
19
20
21
22 **ORDER**

Pursuant to the parties' stipulation, IT IS SO ORDERED.

23 Dated: October 1, 2015

24
25 
26 _____
DALE A. DROZD
UNITED STATES MAGISTRATE JUDGE

27 Ddad1\orders.soc sec\rasmussen0079.stip.eot.ord.docx