		00
υ	OC.	20

1	JESSE S. KAPLAN CSB#103726			
2	5441 Fair Oaks Bl. Ste. C-1			
3	Carmichael, CA 95608 916/488-3030			
4	916/489-9297 fax			
5	Attorney for Plaintiff ANNABELLE HERNANDEZ			
6				
7				
8				
9	UNITED STATES DISTRICT COURT			
10	EASTERN DISTRICT OF CALIFORNIA			
11	-00000-			
12	ANNABELLE HERNANDEZ, No. 2:15-cv-01322-EFB			
13				
14	Plaintiff, STIPULATION AND [proposed]			
15	ORDER FOR SECOND EXTENSION OF PLAINTIFF'S			
16	TIME TO FILE			
17	v. MOTION FOR SUMMARY JUDGMENT			
18 19	CAROLYN COLVIN, Acting Commissioner of Social Security,			
20	Defendant.			
21 22	IT IS HEREBY STIPULATED by and between the parties, through their respective			
23	undersigned attorneys, and with the permission of the Court, that plaintiff's time to file a motion			
24	for summary judgment is extended one day to January 26, 2016.			
25	This extension is requested because of the nature of the case, involving 900+ pages of			
26				
27	record, two consolidated claims, six consultative evaluations, and seven nonexamining medical			
28	opinions.			

1 2 3	Dated: January 25, 2016	/s/ Jesse S. Kaplan JESSE S. KAPLAN Attorney for Plaintiff
4 r		BENJAMIN B. WAGNER United States Attorney
5 6		DEBORAH LEE STACHEL Acting Regional Counsel, Region IX
0 7		Social Security Administration
8	Dated: January 25, 2016	<u>/s/ per e-mail authorization</u> Theophous Reagans
9 10		Special Assistant U.S. Attorney Attorney for Defendant
11		
12		
13	ORD	DER
14		
15	For good cause shown on the basis of this	stipulation, the requested extension of
16	plaintiff's time to file a motion for summary judgment brief is extended to January 26, 2016.	
17	SO ORDERED.	1
18	6 M	und F.Bieman
19		F. BRENNAN
20	UNITED	STATES MAGISTRATE JUDGE
21		
22		
23		
24		
25		
26		
27		
28		