

1 BENJAMIN B. WAGNER
United States Attorney
2 DEBORAH LEE STACHEL
Acting Regional Chief Counsel, Region IX
3 Social Security Administration
4 JEFFREY CHEN, CSBN 260516
Special Assistant United States Attorney
5 Social Security Administration
6 160 Spear Street, Suite 800
San Francisco, CA 94105
7 Telephone: (415) 977-8939
8 Facsimile: (415) 744-0134
Email: Jeffrey.Chen@ssa.gov
9 Attorneys for Defendant

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

14 CRAIG T. CONKLIN,) Civil No. 2:15-cv-01616-CKD
15 Plaintiff,)
16 v.) **STIPULATION AND ~~PROPOSED ORDER~~**
17) **FOR A SECOND EXTENSION OF TIME**
18) **FOR DEFENDANT TO FILE HER**
19) **MOTION FOR SUMMARY JUDGMENT**
20)
CAROLYN W. COLVIN,)
Acting Commissioner of Social Security,)
Defendant.)

21 IT IS HEREBY STIPULATED by the parties, through their undersigned attorneys, and
22 with the approval of the Court, that Defendant shall have a second extension of time of 30 days
23 to file her motion for summary judgment. Defendant respectfully requests this additional time
24 because of a heavy accumulated workload resulting from his two week absence from the office
25 in Taiwan, including a Ninth Circuit merits brief that is due to be filed on Friday, June 24.

26
27
28 Stip. to Extend Def.'s MSJ

1 The new due date for Defendant's motion for summary judgment will be Friday, July 22,
2 2016.

3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Date: June 23, 2016

Respectfully submitted,
LAW OFFICE OF BESS M. BREWER

By: /s/ Bess Brewer*
BESS BREWER
* By email authorization on June 20, 2016
Attorney for Plaintiff

Date: June 23, 2016

BENJAMIN B. WAGNER
United States Attorney

By: /s/ Jeffrey Chen
JEFFREY CHEN
Special Assistant United States Attorney
Attorneys for Defendant

ORDER

APPROVED AND SO ORDERED:

Dated: June 23, 2016



CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE

Stip. to Extend Def.'s MSJ