

1 **JESSE S. KAPLAN CSB#103726**
2 **5441 Fair Oaks Bl. Ste. C-1**
3 **Carmichael, CA 95608**
4 **916/488-3030**
5 **916/489-9297 fax**

6 **Attorney for Plaintiff**
7 **CHERIE B LASQUEZ-TRACY**

8 **UNITED STATES DISTRICT COURT**
9 **EASTERN DISTRICT OF CALIFORNIA**

10 **-o000o-**

11 **CHERIE BLASQUEZ-TRACY,**

12 **No. 2:15-CV-02621-CKD**

13 **Plaintiff,**

14 **STIPULATION AND ORDER**
15 **FOR**
16 **EXTENSION OF PLAINTIFF'S**
17 **TIME TO FILE**
18 **MOTION FOR SUMMARY**
19 **JUDGMENT**

20 **v.**

21 **CAROLYN COLVIN, Acting**
22 **Commissioner of Social Security,**

23 **Defendant.**

24 _____/

25 IT IS HEREBY STIPULATED by and between the parties, through their respective
26 undersigned attorneys, after consideration of respective counsel's schedules, and with the
27 permission of the Court, that plaintiff's time to file a motion for summary judgment is extended
28 to September 2, 2016.

1 This is a second request but of only three days. Plaintiff's counsel has three federal court
2 briefs due this week, in addition to other work.

3 Dated: August 29, 2016

4 /s/ Jesse S. Kaplan
5 JESSE S. KAPLAN
6 Attorney for Plaintiff

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

12 Dated: August 29, 2016

/s/ per e-mail authorization

13 RICHARD RODRIGUEZ
14 Special Assistant U.S. Attorney
15 Attorney for Defendant

16
17 **ORDER**

18
19 For good cause shown on the basis of this stipulation, the requested extension of
20 plaintiff's time to file a motion for summary judgment brief is extended to September 2, 2016.

21
22 SO ORDERED.

23 Dated: August 31, 2016

24 
25 _____
26 CAROLYN K. DELANEY
27 UNITED STATES MAGISTRATE JUDGE
28