| (SS) Wydner v. ( | ommissioner of Social Security   |   | Doc. 12 |  |
|------------------|--|---|---------|--|
|                  |  |   |         |  |
|                  |  |   |         |  |
| 1                | Jared T. Walker (SB#269029)  |   |         |  |
| 2                | 2020 Capitol Avenue<br>Suite 7   |   |         |  |
| 3                | Sacramento, CA 95811<br>T: (916) 476-5044  |   |         |  |
| 4                | F: (916) 476-5064 jared@saclawoffices.com  |   |         |  |
| 5                | Attorney for Plaintiff,  |   |         |  |
| 6                | DAWN WYDNER  |   |         |  |
| 7                | IN THE UNITED STATES DISTRICT COURT  |   |         |  |
| 8                | EASTERN DISTRICT OF CALIFORNIA   |   |         |  |
| 9                | DAWN WYDNER, real party in interest on behalf of GREGORY J. WYDNER,                                    | Case No.: 2: 16-cv-00458-KJM- CMK             |         |  |
| 10               | Plaintiff,   | STIPULATION FOR FIRST 30 DAY                  |         |  |
| 11               | v.   | EXTENSION FOR PLAINTIFF TO FILE OPENING BRIEF |         |  |
| 12               |  | OI EIVIIVO BRIEI                              |         |  |
| 13               | CAROLYN W. COLVIN,<br>Commissioner of Social Security,   |   |         |  |
| 14               | Defendant.   |   |         |  |
| 15               |  |   |         |  |
| 16               | IT IS STIPULATED, by and between the parties, through their respective counsel of record,              |   |         |  |
| 17               | that the time for Plaintiff to file her Motion for Summary Judgment/Remand be extended thirty (30)     |   |         |  |
| 18               | days until September 15, 2016. This is Plaintiff's first request for an extension of time. Despite due |   |         |  |
| 19               | diligence, Plaintiff's counsel has been unable to prepare Plaintiff's opening brief in accordance with |   |         |  |
| 20               | the current scheduling order due to counsel's current workload which has involved conflicting          |   |         |  |
| 21               | deadlines in unrelated matters.  |   |         |  |
| 22               | ///  |   |         |  |
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|                  |  |   | 1       |  |

| 1  | Dated: August 12, 2016   |     | Respectfully submitted,                                      |
|----|--------------------------|-----|--|
| 2  |                          |     | /s/ Jared T. Walker<br>Jared T. Walker,                      |
| 3  |                          |     | Attorney for Plaintiff                                       |
| 4  | SO STIPULATED:           |     |  |
| 5  |                          |     | PHILLIP A. TALBERT   |
| 6  |                          |     | United States Attorney                                       |
| 7  | Dated: August 12, 2016   | By: | /s/ *Jeffrey T. Chen<br>(*authorized by e-mail on 8/12/2016) |
| 8  |                          |     | Jeffrey T. Chen<br>Special Assistant United States Attorney  |
| 9  |                          |     | Attorneys for Defendant                                      |
| 10 |                          |     |  |
| 11 |                          | ORD | <u>DER</u>   |
| 12 |                          |     |  |
| 13 | APPROVED AND SO ORDERED: |     |  |
| 14 |                          |     | 1  |
| 15 | Dated: August 16, 2016   |     | Lraig M. Kellison  |
| 16 |                          |     | CRAIG M. KELLISON UNITED STATES MAGISTRATE JUDGE             |
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