1 Geri N. Kahn (State Bar Number 148536) geri@gerinkahn.com 2 Law Office of Geri N. Kahn 465 California Street, Suite 609 San Francisco, CA 94104 3 Tel. (415) 397-5446 Fax (800) 375-5956 4 5 Attorney for Plaintiff Rowland Gene Perry 6 7 8 IN THE UNITED STATES DISTRICT COURT 9 FOR THE EASTERN DISTRICT OF CALIFORNIA 10 11 Rowland Gene Perry, Case No. 2:16-cv-01116 AC Plaintiff, Stipulation of time for Plaintiff to file Brief in 12 **Support of Motion for Summary Judgment**; 13 VS. [Proposed Order] Carolyn W. Colvin, Acting Commissioner of Social 14 Security, 15 Defendant. 16 17 Plaintiff, by and through his attorney of record, and Defendant, by and through her attorney of 18 record, hereby stipulate, subject to the approval of the Court, to a 30-day extension of time for Plaintiff's 19 counsel to file a brief in support of his Motion for Summary Judgment, in light of the following: 20 1. Plaintiff's counsel had surgery and was recovering but developed complications and her 21 recovery has been somewhat delayed. She has been out of the office longer than 22 anticipated and has been unable to complete the brief. She needs additional time to 23 complete the brief. 24 2. Plaintiff's counsel has emailed Sharon Lahey, Esq., defendant's counsel. Ms. Lahey has 25 indicated that she will not object to the request for a 30 day extension of time for counsel 26 to prepare her brief. 27 28 Case No. 2:16-cv-01116 AC STIPULATION OF TIME FOR PLAINTIFF TO FILE BRIEF IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT; [PROPOSED ORDER]

(SS) Perry v. Commissioner

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1	3. Should the request be granted, Plaintiff's brief will be due on January 19, 2017,	
2	Defendant's reply brief on February 20, 2017, and Plaintiff's optional response brief or	
3	March 6, 2017.	
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5		Respectfully submitted,
6	Dated: December 19, 2016	/s/ Geri N. Kahn
7		GERI N. KAHN Attorney for Plaintiff
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10	Dated: December 19, 2016	/s/ Sharon Lahey SHARON LAHEY
11		Special Assistant United States Attorney (*By email authorization on December 19, 2016)
12	ORDER	
13	Pursuant to stipulation, IT IS SO ORDERI	ED.
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15		
16 17	Dated: December 28, 2016	auson Clane
18		ALLISON CLAIRE UNITED STATES MAGISTRATE JUDGE
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