

1 Geri N. Kahn (State Bar Number 148536)
 2 geri@gerinkahn.com
 3 Law Office of Geri N. Kahn
 4 465 California Street, Suite 609
 5 San Francisco, CA 94104
 6 Tel. (415) 397-5446
 7 Fax (800) 375-5956

8 Attorney for Plaintiff
 9 Rowland Gene Perry

10
 11 IN THE UNITED STATES DISTRICT COURT
 12 FOR THE EASTERN DISTRICT OF CALIFORNIA

13 Rowland Gene Perry,

14 Plaintiff,

15 vs.

16 Carolyn W. Colvin, Acting Commissioner of Social
 17 Security,

18 Defendant.

Case No. 2:16-cv-01116 AC

**Stipulation of time for Plaintiff to file Brief in
 Support of Motion for Summary Judgment;
 [Proposed Order]**

19 Plaintiff, by and through his attorney of record, and Defendant, by and through her attorney of
 20 record, hereby stipulate, subject to the approval of the Court, to a 14-day extension of time for Plaintiff's
 21 counsel to file a brief in support of his Motion for Summary Judgment, in light of the following:

- 22 1. Plaintiff's counsel has been diligently working on her brief, however she has had some
 23 issues arise in her other practice area of immigration law which have demanded her time.
 24 She anticipates no further delay in completing her brief.
- 25 2. Plaintiff's counsel has emailed Sharon Lahey, Esq., defendant's counsel. Ms. Lahey has
 26 indicated that she will not object to the request for a 14 day extension of time for counsel
 27 to prepare her brief.
- 28 3. Should the request be granted, Plaintiff's brief will be due on February 16, 2017,
 Defendant's reply brief on March 20, 2017, and Plaintiff's optional response brief on
 April 3, 2017.

1
2
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

Respectfully submitted,

Dated: February 2, 2017

/s/ Geri N. Kahn
GERI N. KAHN
Attorney for Plaintiff

Dated: February 2, 2017

/s/ Sharon Lahey
SHARON LAHEY
Special Assistant United States Attorney
(*By email authorization on February 2, 2017)

ORDER

Pursuant to stipulation, IT IS SO ORDERED.

Dated: February 6, 2017


ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE