

1 Robert C. Weems (SBN 148156)
 2 WEEMS LAW OFFICES
 3 769 Center Blvd., PMB 38
 4 Fairfax, CA 94930
 5 Ph: (415) 881-7653
 6 Fx: (866) 610-1430
 7 rcweems@weemslawoffices.com

8 Attorney for Plaintiff

9 UNITED STATES DISTRICT COURT
 10 FOR THE EASTERN DISTRICT OF CALIFORNIA
 11 SACRAMENTO DIVISION

12 RAY JACHIN WINKELMAN,
 13 Plaintiff,
 14 v.
 15 Commissioner of Social Security,
 16 Defendant

Case No: 2:16-cv-01126-AC

STIPULATION AND ORDER FOR
 EXTENSION OF TIME
 [Fed.R.Civ.P. 6]

17 WHEREAS, the Plaintiff requires additional time to complete drafting of his
 18 motion for summary judgment;

19 WHEREAS, Plaintiff mis-calendared the date for filing of his motion for summary
 20 judgment to May 15, 2017 instead as stipulated to May 1, 2017;and

21 WHEREAS, an additional extension of 28 days from the May 1, 2017 date is
 22 appropriate to file Plaintiff's motion for his summary judgment brief until May 29, 2017
 23 is required, and any reply by Defendant will be due 30 days thereafter, and is not
 24 requested for an improper purpose. See, FRCP 11; *Unioil, Inc. v. E.F. Hutton & Co.*, 809
 25 F.2d 548, 558 (9th Cir.1986).

26 NOW, WHEREFORE, the Parties agree good cause exists for and, subject to the
 27 Court's approval, stipulate to an extension of all deadlines in this action. The revised due
 28

1 date for the filing of the brief of the motion for summary is May 29, 2017. This is the
2 Plaintiff's second request for additional time.

3
4
5 SO STIPULATED AND AGREED:

6 For Plaintiff:
WEEMS LAW OFFICES

For Defendant:
PHILLIP A. TALBERT
United States Attorney
DEBORAH LEE STACHEL
Regional Chief Counsel,
Region IX
Social Security Administration

11 /s/Robert C. Weems
12 _____
13 Robert C. Weems, Attorney for
14 Plaintiff

By: /s/ Beatrice Na
15 _____
16 Special Assistant United States
17 Attorney and Attorney for the
18 Defendant (per e-mail)

15 SO ORDERED:

17 DATE: May 19, 2017



18 ALLISON CLAIRE
19 MAGISTRATE JUDGE OF THE
20 UNITED STATES DISTRICT COURT