

1 DAVID P. MASTAGNI, ESQ. (SBN 57721)
ANDREW S. DORIOTT, ESQ. (SBN 314740)
2 **MASTAGNI HOLSTEDT**
A Professional Corporation
3 1912 "I" Street
Sacramento, California 95811
4 Telephone: (916) 446-4692
Facsimile: (916) 447-4614
5 davidm@mastagni.com
adoriott@mastagni.com

6 Attorneys for Plaintiff
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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 JOAQUIN SILVA AGUILAR,
12 Plaintiff,
13 v.
14 COMMISSIONER OF SOCIAL
SECURITY,
15 Defendant.
16

) No. 2:17-cv-00089-CKD
)
) Complaint Filed: January 12, 2017
)
) **STIPULATION AND PROPOSED**
) **ORDER FOR AN EXTENSION OF**
) **TIME OF 30 DAYS FOR PLAINTIFF'S**
) **MOTION FOR SUMMARY JUDGMENT**
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18 IT IS HEREBY STIPULATED, by and between the parties, through their respective
19 counsel of record, that Plaintiff shall have an extension of time of an additional thirty (30) days
20 to file his Motion for Summary Judgment in the present case. This is the first continuance
21 sought by Plaintiff. The current due date is December 22, 2017. The new due date will be
22 January 22, 2018 (January 21, 2018, 30 days from December 22, 2017, is a Sunday).

23 Good cause exists for this request. Prior counsel assigned to this case, Carolyn M. Orr,
24 left the Plaintiff's firm, Mastagni Holstedt APC, in September, 2017. Present counsel, Andrew
25 S. Doriott, took over her caseload at that time, and has been working diligently to manage the
26 cases effectively. Plaintiff's counsel has two social security administration hearings set in the
27 next 30 days for which he must prepare. Further, Plaintiff's counsel has recently been assigned
28 additional and unanticipated matters which must be addressed immediately and which cannot be

1 assigned to another attorney. Lastly, Plaintiff's counsel is presently in the process of seeking
2 other counsel to either substitute in or otherwise assist with this case.

3 Therefore, Plaintiff is respectfully requesting additional time up to and including January
4 22, 2018, to prepare his Motion for Summary Judgment. This request is made in good faith and
5 with no intention to unduly delay the proceedings.

6 Dated: December 6, 2017

MASTAGNI HOLSTEDT, APC

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8 By: /s/ Andrew S. Doriott
9 ANDREW S. DORIOTT, ESQ.
10 Attorneys for Plaintiff

11 Dated: December 6, 2017

12 By: /s/ Adam Lazar
13 (As authorized by email on 12/06/2017)
14 ADAM LAZAR, ESQ.
15 Special Assistant United States Attorney
16 Attorneys for Defendant

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18 **ORDER**

19 Based on the foregoing stipulation and good cause appearing therefore, IT IS HEREBY
20 ORDERED that:

21 Plaintiff's Motion for Summary Judgment must be filed by January 22, 2018.

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23 Dated: December 12, 2017

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25 CAROLYN K. DELANEY
26 UNITED STATES MAGISTRATE JUDGE
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