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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.

) 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**  
) **REPLY TO DEFENDANT'S**  
) **OPPOSITION TO PLAINTIFF'S**  
) **MOTION FOR SUMMARY JUDGMENT**  
) **AND PLAINTIFF'S OPPOSITION TO**  
) **DEFENDANT'S CROSS-MOTION FOR**  
) **SUMMARY JUDGMENT**

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 Reply to Defendant's Opposition to Plaintiff's Motion for Summary Judgment and  
21 Opposition to Defendant's Cross-Motion for Summary Judgment in the present case. This is the  
22 first continuance sought by Plaintiff with regard to this Reply/Opposition. The current due date  
23 is April 11, 2018. The new due date will be May 11, 2018.

24 Good cause exists for this request. Plaintiff's counsel has been preparing for and  
25 attending hearings (Plaintiff's counsel attended a hearing earlier this week), and has hearings to  
26 prepare for and attend as soon as next week (the week this Reply/Opposition is due). Further,  
27 Plaintiff's counsel has recently been assigned multiple files, and will be assigned more in the  
28 near future, all of which require detailed review to ensure that any deadlines are met.

1 Therefore, Plaintiff is respectfully requesting additional time up to and including May 11,  
2 2018, to prepare his Reply to Defendant's Opposition to Plaintiff's Motion for Summary  
3 Judgment and Opposition to Defendant's Cross-Motion for Summary Judgment. This request is  
4 made in good faith and with no intention to unduly delay the proceedings.

5  
6 Dated: April 5, 2018

**MASTAGNI HOLSTEDT, APC**

7  
8 By: /s/ Andrew S. Doriott  
ANDREW S. DORIOTT, ESQ.  
9 Attorneys for Plaintiff

10 Dated: April 5, 2018

11 By: /s/ Ellinor R. Coder  
12 (As authorized by email on 04/05/2018)  
ELLINOR R. CODER, ESQ.  
13 Special Assistant United States Attorney  
14 Attorneys for Defendant

15 ORDER

16 Based on the foregoing stipulation and good cause appearing therefore, IT IS HEREBY  
17 ORDERED:

18 Plaintiff's Reply to Defendant's Opposition to Plaintiff's Motion for Summary Judgment  
19 and Opposition to Defendant's Cross-Motion for Summary Judgment must be filed by May 11,  
20 2018.

21  
22 Dated: April 6, 2018

23   
24 \_\_\_\_\_  
CAROLYN K. DELANEY  
25 UNITED STATES MAGISTRATE JUDGE  
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