

1 **JESSE S. KAPLAN CSB#103726**
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3 **Carmichael, CA 95608**
4 **916/488-3030**
5 **916/489-9297 fax**

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9 **Attorney for Plaintiff**
10 **(SS) R.**

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15 **UNITED STATES DISTRICT COURT**
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17 **EASTERN DISTRICT OF CALIFORNIA**

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28 **(SS) R.,**

No. 2:17-CV-00187-CKD

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10 **Plaintiff,**

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28 **STIPULATION AND [proposed]
ORDER FOR EXTENSION OF
TIME TO FILE PLAINTIFF'S
MOTION FOR SUMMARY
JUDGMENT**

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10 **NANCY BERRYHILL, Acting
Commissioner of Social Security,**

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28 **Defendant.**

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28 **IT IS HEREBY STIPULATED by and between the parties, through their respective
undersigned attorneys, and with the permission of the Court, that plaintiff's time to file a motion
for summary judgment is extended to August 25, 2017.**

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28 **This is a first extension but after the due-date under the scheduling order. The extension
is caused by plaintiff's counsel's work-schedule including federal court briefs.**

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3 Dated: August 3, 2017
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/s/ *Jesse S. Kaplan*
JESSE S. KAPLAN
Attorney for Plaintiff

10 Dated: August 3, 2017
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PHILLIP A. TALBERT
United States Attorney
DEBORAH LEE STACHEL
Regional Counsel, Region IX
Social Security Administration

/s/ *per e-mail authorization*

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18 TINA NAICKER
19 Special Assistant U.S. Attorney
20 Attorney for Defendant
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ORDER

For good cause shown on the basis of this stipulation, the requested extension of
plaintiff's time to file a motion for summary judgment brief is extended to August 25, 2017.

SO ORDERED.

Dated: August 7, 2017


CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE