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 8 Attorneys for Plaintiff
 9 JUAN FRANCISCO MENDOZA MENDEZ

8 **UNITED STATES DISTRICT COURT**
 9 **EASTERN DISTRICT OF CALIFORNIA**

11	JUAN FRANCISCO MENDOZA)	Case No.: 2:17-cv-00332-AC
12	MENDEZ)	
13	Plaintiff,)	STIPULATION TO EXTEND TIME
14	v.)	TO FILE MOTION FOR SUMMARY
15	NANCY A. BERRYHILL, Acting)	JUDGMENT
16	Commissioner of Social Security.)	(FIRST REQUEST)
	Defendant.)	

17
 18 Plaintiff Juan Francisco Mendoza Mendez and Defendant Nancy A. Berryhill, Acting
 19 Commissioner of Social Security, through their undersigned attorneys, stipulate, subject to this
 20 court’s approval, to extend the time by 28 days from July 20, 2017, to August 21, 2017, for
 21 Plaintiff to file a Motion for Summary Judgment, with all other dates in the Court’s Order
 22 Concerning Review Of Social Security Cases extended accordingly. This is Plaintiff’s first
 23 request for an extension. This request is made at the request of Plaintiff’s counsel to allow
 24 additional time to fully research the issues presented. Counsel has had hearings daily since late
 25 June 2017. Counsel has tried to complete and handle several motions per week to little avail.
 26 Counsel has canceled her family vacation next week in an effort to catch up on the motions

1 pending and already continued. With this motion, counsel was out of the office last week on
2 hearings and only briefly in the office on Friday due to family matters and out Monday and
3 Tuesday of this week hearings. Today, Wednesday, counsel was involved in telephonic
4 conference with the court and now must go to San Diego for a hearing. Counsel respectfully and
5 in good faith requests an additional 30 days to complete this motion. Counsel has requested this
6 continuance as soon as she is able and in good faith.

7 DATE: July 26, 2017

Respectfully submitted,
LAWRENCE D. ROHLFING

/s/ Denise Bourgeois Haley

9 BY: _____
10 Denise Bourgeois Haley
11 Attorney for plaintiff
12 Juan Francisco Mendoza Mendez

13 DATE: July 26, 2017

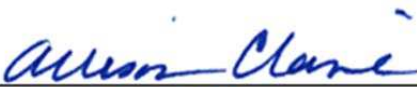
PHILLIP A. TALBERT
United States Attorney
DEBORAH LEE STACHEL
Regional Chief Counsel
Social Security Administration

/s/ Donna W. Anderson

17 BY: _____
18 Donna W. Anderson
19 Special Assistant United States Attorney
20 Attorneys for defendant Nancy A. Berryhill
|*authorized by e-mail|

21 IT IS SO ORDERED.

22 DATED: July 28, 2017.

23
24 
25 ALLISON CLAIRE
26 UNITED STATES MAGISTRATE JUDGE