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8 Attorney for Plaintiff

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

12 JOHN REY DELAROSA,  
 13 Plaintiff,  
 14 v.  
 15 NANCY A. BERRYHILL, Acting  
 16 Commissioner of Social Security,  
 17 Defendant

Case No: 2:17-cv-00423-AC

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

18 WHEREAS, Counsel of Record Robert C. Weems requires additional time to draft  
19 a motion for summary judgment; and

20 WHEREAS, an additional extension of 45 days is appropriate to file Plaintiff's  
 21 motion for summary judgment until February 6, 2018 is required due to limited support  
 22 staff familiar with the case over the holidays and our miscalendaring the case and now  
 23 Defendants calendar need and is not requested for an improper purpose. See, FRCP 11;  
 24 *Unioil, Inc. v. E.F. Hutton & Co.*, 809 F.2d 548, 558 (9th Cir.1986).

25 NOW, WHEREFORE, the Parties agree good cause exists for and, subject to the  
 26 Court's approval, stipulate to an extension of time for Plaintiff to draft and file his cross  
 27 motion for summary judgment in this action. The revised due date for the filing of the  
 28

1 motion for summary judgment is February 6, 2018. This is the Plaintiff's second request  
2 for additional time.

3  
4 **SO STIPULATED AND AGREED:**

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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  
JENNIFER A. KENNEY  
Special Assistant United States  
Attorney

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

By: /s/ Jennifer A. Kenney  
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16 Jennifer A. Kenney  
17 Special Assistant United States  
18 Attorney and Attorney for the  
19 Defendant (per phone call)

20 **SO ORDERED:**

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DATE: January 17, 2018

  
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ALLISON CLAIRE  
MAGISTRATE JUDGE OF THE  
UNITED STATES DISTRICT COURT

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DECLARATION OF CONCURRENCE OF SIGNATURE  
GENERAL ORDER 45, X

I, Robert C. Weems, hereby declare and attest that concurrence in the filing of the document has been obtained from each of the other signatories, or from the single signatory (in the case, e.g., of a declaration) whose signature is indicated by the notation “ /s/ [name of signatory].”<sup>1</sup>

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/s/ Robert C. Weems  
Robert C. Weems

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<sup>1</sup> The filer shall maintain records to support this concurrence for subsequent production for the Court if so ordered or for inspection upon request by a party until one year after final resolution of the action (including appeal, if any) unless filer has attached a scanned image of the signature page(s) of the document being electronically filed in lieu of maintaining the paper record for subsequent production if required.