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8 Attorneys for Plaintiff
9 DAWA JAN KOCHAI

10 **UNITED STATES DISTRICT COURT**
11 **EASTERN DISTRICT OF CALIFORNIA**

12 DAWA JAN KOCHAI) Case No.: 2:17-cv-00690-CKD
13 Plaintiff,)
14 v.) STIPULATION TO EXTEND TIME
15 NANCY A. BERRYHILL, Acting) TO FILE MOTION FOR SUMMARY
16 Commissioner of Social Security.) JUDGMENT
17 Defendant.) (FIRST REQUEST)

18
19 Plaintiff Dawa Jan Kochai and Defendant Carolyn W. Colvin, Acting
20 Commissioner of Social Security, through their undersigned attorneys, stipulate,
21 subject to this court's approval, to extend the time by 35 days from September 5,
22 2017 to October 10, 2017 for Plaintiff to file a Motion for Summary Judgment,
23 with all other dates in the Court's Order Concerning Review Of Social Security
24 Cases extended accordingly. This request is made at the request of Plaintiff's
25 counsel to allow additional time to fully research the issues presented. Counsel
26 currently has 11 motions overdue and is trying to complete all as soon as possible.

1 Counsel's firm lost an attorney last June 2016. Counsel has hired four attorneys' to
2 handle that attorney's caseload consecutively and the last one left on Friday.
3 Counsel has been trying to do as many as possible but remains committed to giving
4 each case the time and focus required to present the best argument possible on the
5 client's behalf. Counsel appreciates that courtesy and patience of the defendant and
6 this court and counsel assures the court that she continues to zealously represent
7 her clients as best possible under the circumstances. Counsel requests this
8 extension in good faith.

9 DATE: September 5, 2017

Respectfully submitted,

10 LAWRENCE D. ROHLFING

11 /s/ Denise Bourgeois Haley

12 BY: _____

Denise Bourgeois Haley
Attorney for plaintiff Dawa Jan Kochai

15 DATE: September 5, 2017

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

18 /s/ Richard Rodriguez

19 BY: _____

Richard Rodriguez
Special Assistant United States Attorney
Attorneys for defendant Nancy A. Berryhill
[*authorized by e-mail]

22 IT IS SO ORDERED

23 Dated: September 11, 2017

24 

25 CAROLYN K. DELANEY
26 UNITED STATES MAGISTRATE JUDGE