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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.	)	(SECOND 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 21 days from October 10,  
22 2017 to October 31, 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 is Plaintiff's second request. Counsel intended to  
25 do this motion over the weekend; however, the Orange County Fires intervened  
26 and counsel is back to work today but is not able to complete this timely. Counsel

1 respectfully requests two weeks as she has two opening briefs due today and  
2 several joint stipulations waiting in the wings. This request is made at the request  
3 of Plaintiff's counsel to allow additional time to fully research the issues presented.  
4 Counsel makes this request in good faith and asks the court's mercy for delays  
5 caused.

6 DATE: October 10, 2017

Respectfully submitted,

7 LAWRENCE D. ROHLFING

8 */s/ Denise Bourgeois Haley*

9 BY: \_\_\_\_\_

Denise Bourgeois Haley  
Attorney for plaintiff Dawa Jan Kochai

12 DATE: October 10, 2017

PHILLIP A. TALBERT

United States Attorney

13 DEBORAH LEE STACHEL

14 Regional Chief Counsel

Social Security Administration

16 */s/ Richard Rodriguez*

17 BY: \_\_\_\_\_

Richard Rodriguez  
Special Assistant United States Attorney  
Attorneys for defendant Nancy A. Berryhill  
18 |\*authorized by e-mail|  
19

20 IT IS HEREBY ORDERED, that Plaintiff shall have an extension of time, to  
21 and include October 24, 2017, in which to file Plaintiff's Motion for Summary  
22 Judgment; and that all other deadlines set forth in the April 3, 2017 Case  
23 Management Order shall be extended accordingly. IT IS SO ORDERED.

24 Dated: October 16, 2017

*Carolyn K. Delaney*

25 CAROLYN K. DELANEY  
26 UNITED STATES MAGISTRATE JUDGE