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8 Attorney for Plaintiff

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

12 JANICE MARIE GOODMAN,
13 Plaintiff,
14 v.
15 Commissioner of Social Security,
16 Defendant

Case No: 2:17-cv-01228-CKD

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

17 Plaintiff requests an extension of thirty (30) days for Plaintiff's counsel to draft
18 and file Plaintiff's motion for summary judgment.

19 Plaintiff believes that items at AR 2 are new and material evidence submitted by
20 Plaintiff's prior attorney to the Appeals Council. Plaintiff needs the additional thirty days to
21 obtain the records from the District Office. The parties request this extension in good faith
22 with no intent to unduly prolong proceedings.

23 Defendant does not object to allowing Plaintiff the additional time to draft his
24 motion for summary judgment and, subject to the Court's approval, stipulates to thirty
25 (30) days extension of time to allow Plaintiff to file his motion for summary judgment in
26 this action. Plaintiff's motion for summary judgment or remand is now due on February
27 27, 2018. This is Plaintiff's first request for additional time.
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1 SO STIPULATED AND AGREED:

2 For Plaintiff:

3 WEEMS LAW OFFICES

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8 /s/Robert C. Weems

9 Robert C. Weems, Attorney for
10 Plaintiff

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14 SO ORDERED.

15 Dated: February 7, 2018

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For Defendant:

MCGREGOR W. SCOTT

United States Attorney

DEBORAH LEE STACHEL

Regional Chief Counsel,

Region IX

Social Security Administration

By: /s/ Daniel P. Talbert

Daniel P. Talbert

Special Assistant United States

Attorney and Attorney for the

Defendant (per e-mail authorization)



CAROLYN K. DELANEY

UNITED STATES MAGISTRATE JUDGE

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DECLARATION OF CONCURRENCE OF SIGNATURE
GENERAL ORDER 131, 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].”¹

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

¹ 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.