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Attorney for Plaintiff
GAMA o/b/o X.L.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

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GAMA on behalf of X.L.,

No. 2:17-CV-01969-CMK

Plaintiff,

STIPULATION AND ORDER
FOR EXTENSION OF
TIME TO FILE PLAINTIFF'S
MOTION FOR SUMMARY
JUDGMENT

v.

NANCY BERRYHILL, Acting
Commissioner of Social Security,

Defendant.

IT IS HEREBY STIPULATED by and between the parties, through their respective undersigned attorneys, and with the permission of the Court, that plaintiff's time to file a motion for summary judgment is extended to April 4, 2018.

This is a first extension. Plaintiff's counsel did not contact defendant's counsel requesting this extension until March 16, 2018, at which time approximately this date was proposed. The requested extension is because plaintiff's counsel twice traveled to Southern California for

1 multiple days at the end of February and early March for a conference and for a hearing, and
2 travels again to Oregon for a hearing before this due date. In between, multiple other hearings
3 were done. But primarily the reason for this request was the necessity to spread the due dates of
4 several other opening and reply briefs out over approximately a month, many of which otherwise
5 fell due in the first part of March. This is the equivalent of an approximately 30-day extension
6 from the due date based on when the record was lodged.
7

8 Dated: March 26, 2018

9 _____
10 /s/ _____
11 JESSE S. KAPLAN
12 Attorney for Plaintiff

13 PHILLIP A. TALBERT
14 United States Attorney
15 DEBORAH LEE STACHEL
16 Regional Counsel, Region IX
17 Social Security Administration

18 Dated: March 26, 2018

19 _____
20 /s/ *per e-mail authorization*

21 BEATRICE NA
22 Special Assistant U.S. Attorney
23 Attorney for Defendant

24 **ORDER**

25 For good cause shown on the basis of this stipulation, the requested extension of
26 plaintiff's time to file a motion for summary judgment brief is extended to April 4, 2018.

27 SO ORDERED.

28 Dated: March 28, 2018


CRAIG M. KELLISON
UNITED STATES MAGISTRATE JUDGE