

1 BARBARA MARIE RIZZO (CSBN 172999)
Attorney At Law
2 P. O. Box 383103
Waikoloa, HI 96738
3 Telephone: 808-785-6088
4 Fax: 808-440-0699
E-Mail: mail@fedlaborlaw.com

5 Attorney for Plaintiff Stephen D. Hicks
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7 UNITED STATES DISTRICT COURT
8 EASTERN DISTRICT OF CALIFORNIA
9 SACRAMENTO DIVISION
10

11	STEPHEN D. HICKS,)	Case No.:	2:17-CV-02480-TLN-KJN
)		
12	Plaintiff,)	STIPULATION AND ORDER	
)	FOR AN EXTENSION OF TIME FOR	
13	v.)	PLAINTIFF TO FILE HIS REPLY	
)	BRIEF	
14	NANCY A. BERRYHILL, Acting)		
15	Commissioner of Social Security,)		
)		
16	Defendant.)		
)		

17 IT IS HEREBY STIPULATED, by and between the parties, through their
18 respective counsel, that Plaintiff shall have an extension of time of an
19 additional 30 days to file his Motion for Summary Judgment. This is the
20 first continuance sought by Plaintiff.
21

22 On November 27, 2017, the Court issued a Procedural Order for Social
23 Security Review Actions. [Docket No. 3]. The Order states that Plaintiff
24 shall file a Motion for Summary Judgment within 45 days after service of the
25 Administrative Record. Defendant filed the Administrative Record on April
26 11, 2018. [Docket No. 11]. Therefore, Plaintiff's Motion for Summary
27 Judgment is currently due on May 29, 2018. Plaintiff seeks an extension of
28

1 time of 30 days to file his Motion for Summary Judgment. The new due date
2 for Plaintiff's Motion for Summary Judgment will be June 28, 2018.

3 There is good cause for this request. There has been a sudden and
4 unexpected death in Plaintiff's family. In addition, another member of
5 Plaintiff's family has had an accident resulting in a serious injury. These
6 family emergencies will require Plaintiff's counsel to travel out of town
7 and be out of the office for at least 10 days. Therefore, Plaintiff is
8 respectfully requesting additional time up to and including June 28, 2018 to
9 file his Motion for Summary Judgment. This extension of time is made in
10 good faith with no intention to unduly delay the proceedings.
11

12 Respectfully submitted,

13 Date: May 10, 2018

14 "/s/Sharon Lahey"
15 (As authorized by e-mail on 5/10/2018)
16 SHARON LAHEY
17 Attorney for Defendant

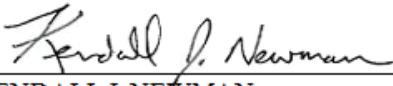
18 Date: May 10, 2018

19 "/s/Barbara Marie Rizzo"
20 BARBARA MARIE RIZZO
21 Attorney for Plaintiff

22 **ORDER**

23 APPROVED AND SO ORDERED:

24 Dated: May 11, 2018

25 
26 _____
27 KENDALL J. NEWMAN
28 UNITED STATES MAGISTRATE JUDGE