1 JESSE S. KAPLAN CSB#103726 5441 Fair Oaks Bl. Ste. C-1 2 Carmichael, CA 95608 916/488-3030 3 916/489-9297 fax 4 **Attorney for Plaintiff** 5 VYACHESLAV RUMANTSEV 6 7 8 UNITED STATES DISTRICT COURT 9 EASTERN DISTRICT OF CALIFORNIA 10 -o0O0o-11 12 VYACHESLAV RUMANTSEV, No. 2:17-CV-02539-EFB 13 14 Plaintiff, 15 STIPULATION AND [proposed] ORDER FOR EXTENSION OF 16 TIME TO FILE PLAINTIFF'S **MOTION FOR SUMMARY** v. 17 **JUDGMENT** 18 NANCY BERRYHILL, Deputy Commissioner, performing the duties and functions not 19 specifically reserved to the Commissioner of Social Security, 20 21 Defendant. 22 23 IT IS HEREBY STIPULATED by and between the parties, through their respective 24 undersigned attorneys, and with the permission of the Court, that plaintiff's time to file a motion 25 for summary judgment is extended to June 11, 2018. 26 This second extension of one business day is because of continuing problems of plaintiff's 27 counsel with switching internet provider services and re-networking his computers, specifically 28 [Pleading Title] - 1

1	problems with the internet service provider company; then, in addition, counsel is also handling		
2	four hearings this week, including one out of town, besides his other work and this opening brief		
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4			
5	Dated: June 7, 2018	/s/ Jesse S. Kaplan	
6	2 40.00.   1 5.5.5   1, 5.5.5	JESSE S. KAPLAN	
7		Attorney for Plaintiff	
8			
9		PHILLIP A. TALBERT United States Attorney	
10		DEBORAH LEE STACHEL	
11		Regional Counsel, Region IX Social Security Administration	
12			
14	Dated: June 7, 2018	/s/ per e-mail authorization	
15		CAROLYN CHEN	
16		Special Assistant U.S. Attorney Attorney for Defendant	
17		•	
18			
19	<u>ORDER</u>		
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21	For good cause shown on the basis of this stipulation, the requested extension of		
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23	plaintiff's time to file a motion for summary judgment brief is granted. The motion for summary		
24	judgment (ECF No. 13) filed on June 11, 2018, is deemed timely.		
25	SO ORDERED.	Charles I Lib in a	
26	DATED: June 14, 2018.		
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