

1 Dolly M. Trompeter (CSBN 235784)  
 2 Attorney At Law  
 2261 Market Street, No. 185  
 3 San Francisco, CA 94114  
 Telephone: 415 271-8604  
 4 Fax: 415 431-0279

5 Attorney for Plaintiff Michael Eugene Perry

6  
 7 UNITED STATES DISTRICT COURT  
 8  
 9 NORTHERN DISTRICT OF CALIFORNIA

10 Michael E. Perry )

Civil No. 09-09-4908 MEJ

)  
 11 ) STIPULATION AND PROPOSED ORDER  
 12 ) EXTENDING PLAINTIFF'S TIME TO FILE  
 13 ) PLAINTIFF'S MOTION FOR SUMMARY  
 14 ) JUDGMENT

14 Plaintiff, )

15 v. )

16 MICHAEL J. ASTRUE, )

17 Commissioner of )  
 18 Social Security, )

18 Defendant. )  
 19 \_\_\_\_\_ )

20  
 21 IT IS HEREBY STIPULATED by and between the undersigned  
 22 attorneys, subject to the approval of the Court, that Plaintiff may  
 23 have an extension of 30 days in which to file her motion for summary  
 24 judgment. Plaintiff's motion, which was formerly due on June 18,  
 25 2010 is now due on July 19, 2010. This extension is necessary to  
 26 provide further opportunity for review and analysis of this case.  
 27  
 28

1 The parties further stipulate that the Court's Procedural Order shall  
2 be modified accordingly.

3  
4  
5 This is Plaintiff's second request for an extension.

6 Dated: 6/16/10 /s/ Dolly M. Trompeter

7 DOLLY M. TROMPETER, ESQ.  
8 Attorney for Plaintiff

9  
10 JOSEPH P. RUSSONIELLO  
11 United States Attorney


12  
13 Dated: 6/16/10 By: /s/ Theophous Reagans

14 (as authorized via email on June 16, 2010)

15 THEOPHOUS REAGANS, ESQ.  
16 Special Assistant U.S. Attorney

17  
18  
19 PERSUANT TO STIPULATION, IT IS SO ORDERED that Plaintiff shall have  
20 an additional 30 days in which to file her motion for summary  
21 judgment, up to and including July 19, 2010.

22  
23  
24 Dated: June 17, 2010

25   
26 THE HONORABLE MARINA-ELENA JAMES,  
27 Chief Magistrate Judge,  
28 United States District Court