

1 Geri N. Kahn, Esq., SBN 148536
 2 400 Montgomery Street, Suite 810
 3 San Francisco, CA 94104
 4 Tel. (415) 397-5446
 5 Fax (707) 361-0350
 6 Email: gkahn@pacbell.net

7 UNITED STATES DISTRICT COURT
 8 NORTHERN DISTRICT OF CALIFORNIA
 9 SAN FRANCISCO DIVISION

10 SHENITA M. KING,)	Case No.: No. 09-5322 MEJ
)	
11 Plaintiff,)	STIPULATION TO EXTEND DUE DATE
)	OF PLAINTIFF'S BRIEF IN SUPPORT OF
12 vs.)	HER MOTION FOR SUMMARY
)	JUDGMENT; AND {PROPOSED ORDER}
13 MICHALE J. ASTRUE, Commissioner of)	
)	
14 Social Security,)	
)	
15 Defendant.)	
16)	

17
 18 Plaintiff, by and through her attorney of record, and Defendants, by and through
 19 their attorneys of record, hereby stipulate, subject to the approval of the Court, to a 90-
 20 day extension of time for Plaintiff's counsel to file a brief in support of her Motion for
 21 Summary Judgment, in light of the following:

- 22 1. Plaintiff, Shenita King, retained counsel on September 6, 2010. Her new
 23 counsel did not represent her at any point in the administrative process
 24 and is generally unfamiliar with her case.

2. Plaintiff's counsel has spoken with Elizabeth Firer, Esq., defendant's counsel and she has indicated that she is agreeable to a 90 day - extension of time for counsel to prepare her brief.
3. Plaintiff's counsel has not yet had a chance to review the transcript thoroughly. She will need the extension of time to meet with Plaintiff more, to review the transcript and to prepare the motion for summary judgment.
4. Should the request be granted, Plaintiff's brief will be due on December 6, 2010, Defendant's reply brief on January 5, 2011 and Plaintiff's response on ~~December~~ ^{January} 19, 2011.

Respectfully submitted,

Dated: September 6, 2010

/s/ Geri N. Kahn
 GERI N. KAHN
 Attorney for Plaintiff

Dated: September 7, 2010


/s/Elizabeth Firer
 ELIZABETH FIRER
 Special Assistant United States Attorney
 Attorney for Defendants

ORDER

The OSC is DISCHARGED.
 Pursuant to stipulation, IT IS SO ORDERED.

October 20

Date: ~~September~~ ____, 2010



 Maria-Elena James
 United States Magistrate Judge