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RYAN T. DUNN (SBN: 215383) 1 MATTHEW R. CODY (SBN: 267191) **DUNN & PANAGOTACOS LLP** 2 369 Pine Street, Suite 506 San Francisco, CA 94104 3 Telephone: (415) 982.2100 Facsimile: (415) 982.2119 4 rdunn@dpllp.com 5 Attorneys for Plaintiffs JODIE WHITE, an individual, LISA WHITE, an individual, J.W., a minor by and through his 6 guardian ad litem LISA WHITE 7 8

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

JODIE WHITE, an individual, LISA WHITE, an individual, J.W., a minor by and through his guardian ad litem LISA WHITE

Plaintiffs,

vs.

UNITED STATES OF AMERICA, SOCIAL SECURITY ADMINISTRATION, RYAN LUIS, and DOES 1-20, inclusive,

Defendants.

Case No. C14-05604 JST

STIPULATED REQUEST FOR ORDER CHANGING TIME FOR PLAINTIFFS TO FILE AN AMENDED COMPLAINT AND FEDERAL DEFENDANTS TO FILE A RESPONSIVE PLEADING; [PROPOSED] ORDER

Plaintiffs Lisa White, Jodie White, and J.W., a minor by and through his guardian ad litem Lisa White (collectively, "plaintiffs"), and defendants United States of America, Social Security Administration, and Ryan Luis (collectively, "federal defendants"), by and through their undersigned counsel, hereby stipulate and agree as follows:

1. The Court's June 24, 2015 Order Granting Defendants' Motion to Dismiss provided plaintiffs until July 8, 2015 to file an amended complaint. See ECF No. 30. In the event plaintiffs file an amended complaint, federal defendants' response will be due 14 days after the amended complaint is filed. See Fed. R. Civ. P. 15(a)(3).

2. Subject to the approval of the Court, the parties hereby stipulate and agree to extend the deadline for plaintiffs' to file an amended complaint and the deadline for federal defendants' to respond to an amended complaint as follows:

Plaintiffs' Deadline to File Amended Complaint: July 22, 2015

Federal Defendants' Deadline to Respond to Amended Complaint: August 10, 2015

- 3. Plaintiffs' counsel has informed federal defendants that plaintiff Lisa White has been the main contact for plaintiffs' counsel in this action, and that plaintiffs' counsel has been unable to confer with Ms. White about an amended complaint because she has been on vacation.
 Due to this difficulty, plaintiffs seek a two-week extension of the deadline for plaintiffs to file an amended complaint in this action, from July 8, 2015 until July 22, 2015. Federal defendants have agreed to this extension. Because federal defendants' counsel anticipates that she will be out of the office for a portion of the last two weeks of July, the parties have agreed that federal defendants will have until August 10, 2015 to respond to an amended complaint.
- 4. The Court has previously issued three orders continuing the initial case management in this action. Currently, the initial case management conference in this action is set for August 19, 2015. The parties previously stipulated, pursuant to Local Rule 6-1(a), to extend the federal defendants' deadline to respond to the Complaint by approximately two and half weeks.

 There have been no other time modifications in this action.

Dated: July 1, 2015 DUNN & PANAGOTACOS LLP

By: /s/
Matthew R. Cody
Attorneys for Plaintiffs

1	Dated: July 1, 2015 MELINDA HAAG United States Attorney
2	By Carl As /
3	Jennifer S Wang
4	Assistant United States Attorney Attorneys for Federal Defendants
5	
6	[PROPOSED] ORDER
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8	The Court, having considered the Stipulated Request for Order Changing Time, hereby
9	finds good cause to extend the time for Plaintiffs to file an amended complaint from July 8, 2015
10	to July 22, 2015. Federal defendants will have until August 10, 2015 to file a response to the
11	amended complaint.
12	PURSUANT TO STIPULATION, IT IS SO ORDERED.
13	Q. A. 1.
14	Dated: July 6, 2015 JON S. TIGAR
15	United States District Court Judge
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