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5 Attorney for Plaintiff,  
 6 ROBERT COLBURN

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

11 ROBERT COLBURN,	)	Case No. 3:15-CV-00586-JST
	)	
12 Plaintiff,	)	<b>STIPULATION AND PROPOSED ORDER</b>
13 vs.	)	<b>FOR AN EXTENSION OF TIME FOR</b>
	)	<b>PLAINTIFF TO FILE MOTION FOR</b>
14 CAROLYN W. COLVIN, Acting	)	<b>SUMMARY JUDGMENT</b>
15 Commissioner of the Social Security	)	
16 Administration,	)	
	)	
17 Defendant.	)	

18 IT IS HEREBY STIPULATED, by and between parties, through their representative  
 19 counsel of record, that Plaintiff shall have a first extension of time of 90 days to file his  
 20 Motion For Summary Judgement in response to Defendant's Answer . The new date for filing  
 21 Plaintiff's Motion for Summary Judgement will be September 21, 2015.

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 23 This extension is necessary because Donald H. Medearis substituted in as Plaintiff's  
 24 attorney on June 16, 2015, was not the Plaintiff's attorney in the administrative proceeding,  
 25 therefore needs more time to familiarize himself with the law and facts of the case to  
 26 properly prepare the Motion For Summary Judgment, and already has a substantial caseload.  
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28 STIPULATION TO EXTENSION OF TIME FOR PLAINTIFF TO FILE MOTION FOR  
 SUMMARY JUDGMENT, AND PROPOSED ORDER; CASE NO. 3:15-CV-00586-JST

1 Plaintiff's Attorney apologizes to the Court and Opposing Counsel for the delay. The parties  
2 further stipulate that the Court's Scheduling Order shall be modified accordingly.

3 Respectfully submitted,

4 Dated: June 17, 2015

*/s/Donald H. Medearis*  
DONALD H. MEDEARIS  
BAY AREA LEGAL AID

7 Dated: June 17, 2015

MELINDA L. HAAG  
United States Attorney  
DONNA L. CALVERT  
Regional Chief Counsel, Region IX  
Social Security Administration

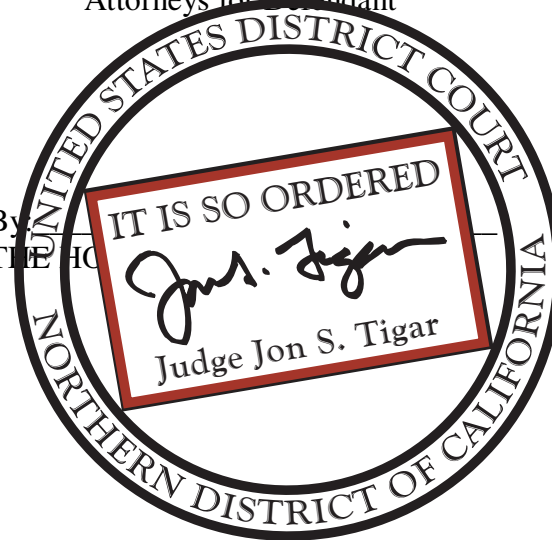
11 By: */s/Richard M. Rodriguez*  
12 (\* as authorized by e-mail on June 17, 2015)  
13 RICHARD M. RODRIGUEZ  
14 Special Assistant United States Attorney  
Attorneys for Defendant

15 ORDER:

16 APPROVED AND SO ORDERED

17 Dated: June 19, 2015

18 By: \_\_\_\_\_  
19 THE COURT



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28 STIPULATION TO EXTENSION OF TIME FOR PLAINTIFF TO FILE MOTION FOR  
SUMMARY JUDGMENT, AND PROPOSED ORDER; CASE NO. 3:15-CV-00586-JST