

1 STEVEN BRUCE, SBN 70300
 2 People With Disabilities Foundation
 3 507 Polk Street, Suite 430
 4 San Francisco, CA 94102
 5 Phone: (415) 931-3070
 6 Fax: (415) 931-2828
 7 sbruce@pwwdf.org

8 Attorney for Plaintiff

9 UNITED STATES DISTRICT COURT
 10
 11 NORTHERN DISTRICT OF CALIFORNIA

<p>12 PEOPLE WITH DISABILITIES, INC.</p> <p>13 Plaintiff,</p> <p>14 v.</p> <p>15 CAROLYN COLVIN, Acting Commissioner of Social Security,</p> <p>16 Defendant.</p>	<p>17 CASE NO.:</p> <p>18 3:15-CV-02570 HSG</p> <p>19 STIPULATION BETWEEN THE PARTIES AND ORDER GRANTING LEAVE TO PLAINTIFF TO FILE FIRST AMENDED COMPLAINT AND TO EXTEND RESPONSIVE PLEADING DATE UNTIL NO LATER THAN OCTOBER 23, 2015</p>
--	--

17 **PRELIMINARY STATEMENT**

18
 19 People with Disabilities, Inc. (“Plaintiff”) and Defendant Carolyn Colvin, Acting
 20 Commissioner of Social Security (“Defendant”), by and through their respective counsel, submit
 21 the following Stipulation, and request that the Court grant Plaintiff leave to file a First Amended
 22 Complaint pursuant to Rule 15(a) of the Federal Rules of Civil Procedure:

- 23 1. There has been one previous continuance in this action at the request of the
 24 Defendant Social Security Administration. *See* Doc. No 15,16

- 1 2. Plaintiff is filing a First Amended Complaint to which Defendant's counsel does not
2 disagree so long as the responsive pleading is not due until October 23, 2015.
- 3 3. The parties stipulate and agree that Defendant's response to Plaintiff's First Amended
4 Complaint will be due on October 23, 2015.
- 5 4. The parties further request that the initial case management conference be continued
6 from November 10, 2015 to December 15, 2015 at 2:00 p.m. This Continuance will
7 allow more time for a hearing on Defendant's responsive pleading prior to the initial
8 case management conference, should Defendant decide to file a motion in response to
9 Plaintiff's First Amended Complaint.
- 10 5. **WHEREFORE**, the parties hereby stipulate and request that the Court grant plaintiff
11 leave to file a First Amended Complaint in this action, a true and correct copy of
12 which is attached as Exhibit A hereto.

13
14 DATED: September 21, 2015

Respectfully submitted,

15
16 _____/s/_____
17 STEVEN F. BRUCE
18 Attorney for Plaintiff
19 People with Disabilities Foundation, Inc.

20 DATED: September 21, 2015

Respectfully submitted,


21 MELINDA HAAG
22 United States Attorney
23 _____/s_/_____
24 ANN MARIE REDING
25 Assistant United States Attorney

Attorneys for Defendant

ORDER

Plaintiff and Defendant's Stipulation and Proposed Order granting leave to Plaintiff to file First Amended Complaint and to Extend Responsive Pleading Date Until October 23, 2015 is hereby GRANTED. Defendant shall file her responsive pleading to Plaintiff's First Amended Complaint on or before October 23, 2015. The case management scheduled for November 10, 2015 has been continued to December 15, 2015 at 2:00 p.m.

DATE: September 22, 2015


HAYWOOD S. GILLIAM, JR.
United States District Judge