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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

14	PEOPLE WITH DISABILITIES, INC.,)	CASE NO. 3:15-CV-02570-HSG
15	Plaintiff,)	STIPULATION AND ORDER CONTINUING
16	v.)	DEADLINE FOR RESPONSIVE PLEADING AND
17	CAROLYN COLVIN, Acting Commissioner of)	PROPOSED BRIEFING SCHEDULE
18	Social Security,)	
19	Defendant.)	

20 People with Disabilities, Inc. ("Plaintiff") and Defendant Carolyn Colvin, Acting Commissioner
21 of Social Security ("Defendant"), by and through their respective counsel, make the following
22 representations and stipulate and agree as follows:

- 23 1. On June 22, 2016, Plaintiff filed its Second Amended Complaint in this action. *See* Dkt.
24 No. 30.
- 25 2. On the same date, counsel for Defendant requested a thirty-seven-day extension of time,
26 up to and including August 12, 2016, to respond to the Second Amended Complaint. Plaintiff has
27

28 STIPULATION AND ~~PROPOSED~~ ORDER
Case No. 3:15-cv-02570-HSG

1 agreed to this request and Plaintiff's counsel has also indicated that he will be unavailable from August
2 14, 2016 to August 29, 2016.

3 3. Based on the foregoing, the parties agree that should Defendant file a motion to dismiss
4 Plaintiff's Second Amended Complaint, Plaintiff will have thirty-seven days to file an opposition, up to
5 and including September 19, 2016. The parties further agree that Defendant will have fourteen days to
6 file her reply, up to and including October 3, 2016. Defendant will notice her motion for an appropriate
7 hearing date based on this proposed briefing schedule.

8 4. The Court has allowed two prior extensions of time related to Defendant's response to
9 Plaintiff's original Complaint and the parties briefing schedule related to Defendant's motion to dismiss
10 Plaintiff's First Amended Complaint. *See* Dkt. Nos. 15, 21.

11 5. There are no dates set in this case. Accordingly, the requested time modification will have
12 not affect any date set by the Court.

13
14 DATED: June 24, 2016

Respectfully submitted,

15 /s/ Steven F. Bruce
16 STEVEN F. BRUCE
17 Attorney for Plaintiff
People with Disabilities Foundation, Inc.

18 DATED: June 24, 2016

Respectfully submitted,

19 BRIAN J. STRETCH
20 United States Attorney

21 /s/ Ann Marie Reding¹
22 ANN MARIE REDING
23 Assistant United States Attorney
Attorneys for Defendant


24 **ORDER**

25 Plaintiff and Defendant's Stipulation and Proposed Order Continuing Deadline for Defendant's
26

27 ¹ I, Ann Marie Reding, hereby attest that I obtained the concurrence in the filing of this
document of all signatories whose signatures are represented by /s/.

1 Responsive Pleading and Proposed Briefing Schedule is hereby **GRANTED**. Defendant shall file her
2 responsive pleading to Plaintiff's Amended Complaint on or before August 12, 2016. Plaintiff will file
3 its opposition by September 19, 2016, and Defendant shall file her reply by October 3, 2016. Defendant
4 will notice her motion for an appropriate hearing date, at least two weeks from the date the reply brief
5 will be filed.

6 Date: June 24, 2016

7 
8 HAYWOOD S. GILLIAM, JR.
9 United States District Judge