

1 Dolly M. Trompeter (CSBN 235784)
 2 Attorney At Law
 2261 Market Street, No. 185
 San Francisco, CA 94114
 3 Telephone: 415 271-8604
 Fax: 415 431-0279
 4 Email: Dolly@DollyDisabilityLaw.com

5 Attorney for Plaintiff, Thomas A. Michalski

6 **UNITED STATES DISTRICT COURT**
 7
 8 **NORTHERN DISTRICT OF CALIFORNIA**

9 **THOMAS A. MICHALSKI,**)
 10 Plaintiff,)

Case No.: 3:15-cv-4483-EMC

11 v.)

12 **CAROLYN W. COLVIN,**)
 13 Acting Commissioner of)
 Social Security,)

PLAINTIFF’S MOTION FOR EXTENSION OF
TIME IN WHICH TO FILE PLAINTIFF’S MOTION
FOR SUMMARY JUDGMENT and ~~PROPOSED~~
ORDER

14)
15 Defendant.)
16 _____)

17 Pursuant to N.D.C.A Civil Local Rule 6, Plaintiff, by and through undersigned counsel, respectfully
 18 moves this Court for an enlargement of time of 30 days, up to and including July 9, 2016 in which to file
 19 Plaintiff’s Motion for Summary Judgment. On June 5, 2016, the undersigned counsel emailed with both Mr.
 20 Rodriguez, SSA Assistant Regional Counsel and also Mr. Win, who is the Supervising SSA Attorney, and
 21 requested a stipulation agreeing to extend Plaintiff’s time for filing his Motion for Summary Judgment by 30
 22 days from June 9, 2016 to July 9, 2016; Mr. Rodriguez and Mr. Win said that Defendant would not oppose
 23 Plaintiff’s motion to extend time.
 24

25 This extension is necessary to provide further opportunity for review and analysis of this case, as
 26 undersigned counsel was not the original attorney on the case and is in the process of exploring the possibility
 27 of Request for Voluntary Remand in order to avoid further litigation in this case. Plaintiff does not believe
 28

1 that Defendant will be prejudiced by his delay. This is further evidenced by the Defendant's declining to
2 oppose this Motion. This is Plaintiff's second request for an extension.

3
4 I declare under penalty of perjury that the facts recited above are true and correct. Executed this seventh day
5 of June 2016 in San Francisco, CA.

6
7 By "/s/ Dolly M. Trompeter"
8 DOLLY M. TROMPETER, ESQ.
9 Attorney for Plaintiff

10
11 IT IS SO ORDERED that Plaintiff shall have an additional 30 days in which to file his motion for summary
12 judgment, up to and including JULY 9, 2016.

13
14
15 Dated: 6/8/16

