

1 DONALD H. MEDEARIS, SBN 206849
 2 BAY AREA LEGAL AID
 3 1800 Market Street, 3rd Floor
 4 San Francisco, CA 94102
 Telephone: (415) 354-6331
 Fax: (415) 982-4243
 dmedearis@baylegal.org

5 Attorney for Plaintiff,
 6 JENNIFER PIRACHA

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

11	JENNIFER PIRACHA,)	Case No. 3:17-CV-00129-JST
12	Plaintiff,)	
13	vs.)	STIPULATION AND PROPOSED ORDER
14	NANCY A.BERRYHILL, Commissioner of the)	FOR AN EXTENSION OF TIME FOR
15	Social Security Administration,)	PLAINTIFF TO FILE MOTION FOR
16	Defendant.)	SUMMARY JUDGMENT
17)	

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 70 days to file her
 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 August 7, 2017.

22
 23 This extension is necessary because Donald H. Medearis substituted in as Plaintiff's
 24 attorney on May 10, 2017, and although he represented the Plaintiff in her Social Security
 25 Appeals Council case, he did not represent her at her Administrative Law Judge hearing,
 26 needs more time to familiarize himself with the law and facts of the case and has a heavy
 27

28 STIPULATION TO EXTENSION OF TIME FOR PLAINTIFF TO FILE MOTION FOR
 SUMMARY JUDGMENT, AND PROPOSED ORDER; CASE NO. 3:17-CV-00129-JST

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

4 Respectfully submitted,

5 Dated: May 10, 2017

6 /s/Donald H. Medearis
7 DONALD H. MEDEARIS
8 BAY AREA LEGAL AID

9 Dated: May 10, 2017

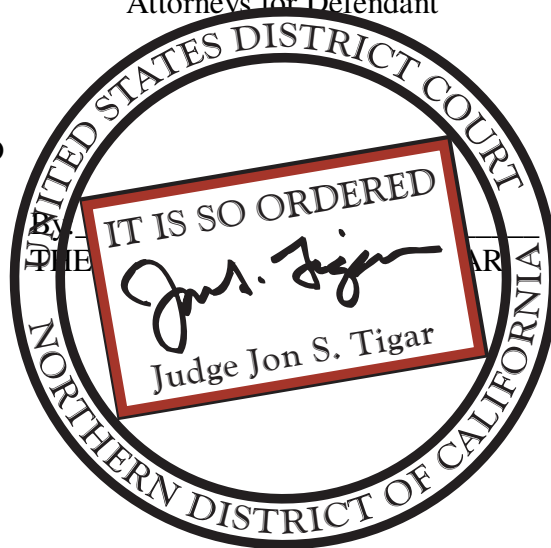
10 BRIAN STRETCH
11 United States Attorney
12 SARA WINSLOW
13 Chief of Civil Division
14 DEBORAH STACHEL
15 Regional Chief Counsel, Region IX
16 Social Security Administration

17 By: /s/Jennifer A. Kenney
18 (* as authorized by e-mail on May 10, 2017)
19 JENNIFER A. KENNEY
20 Special Assistant United States Attorney
21 Attorneys for Defendant

22 ORDER:

23 APPROVED AND SO ORDERED

24 Dated: May 16, 2017



25
26
27
28 STIPULATION TO EXTENSION OF TIME FOR PLAINTIFF TO FILE MOTION FOR
SUMMARY JUDGMENT, AND PROPOSED ORDER; CASE NO. 3:17-CV-00129-JST