1 2 3	DONALD H.MEDEARIS, SBN 206849 BAY AREA LEGAL AID 1800 MARKET Street, 3 rd Floor San Francisco, CA 94102 Telephone: (415) 354-6331		
4	Fax: (415) 982-4243 dmedearis@baylegal.org		
5	Attorney for Plaintiff,		
6 7	ADELAIDE FLEISCHMAN		
8	UNITED STATES DISTRICT COURT		
9	NORTHERN DISTRICT OF CALIFORNIA		
10	SAN FRANCISCO DIVISION		
11		Case No. 3:17-CV- 01502-RS	
12	ADELAIDE FLEISCHMAN,	STIPULATION AND PROPOSED ORDER	
13	Plaintiff, vs.	FOR A THIRD EXTENSION OF TIME FOR PLAINTIFF TO FILE MOTION FOR	
14 15	NANCY A. BERRYHILL, Acting	SUMMARY JUDGMENT	
15	Commissioner of the Social Security Administration,)	
17	Defendant.)	
18			
19	IT IS HEREBY STIPULATED, by and between the parties, through their respective		
20	counsel of record, that Plaintiff shall have an extension of time of 7 days to file her Motion		
21	for Summary Judgment in response to Defendant's Answer. The current date for filing the		
22	Plaintiff's Motion for Summary Judgment (MSJ) is November 15, 2017. The new due date		
23	will be November 22, 2017. Plaintiff's attorney came down with a gastrointestinal illness on		
24 25			
23 26	Friday, November 10. Symptoms have continued through today. If the Court needs evidence		
20	of his November 12 doctor office visit, Plaintiff's attorney is happy to provide it. Plaintiff's		
28	STIPULATION TO THIRD EXTENSION OF TIME FOR PLAINTIFF TO FILE MOTION FOR SUMMARY JUDGMENT, AND PROPOSED ORDER; CASE NO. 3:17-CV-01502- RS		

1	attorney has come into the office every day and made his best effort to finish the MSJ, but		
2	has been working less productively than usual and believes he has a duty to his client to take		
3	extra time to finish the MSJ. Plaintiff's attorney also wishes to point out that Plaintiff's first		
4	extension of time was before Plaintiff's attorney substituted in as attorney, replacing the		
5	Plaintiff who had been Pro Se, and the second extension of time was for 14 days only.		
6	Plaintiff's attorney sincerely apologizes to the Court and to the Defendant for any		
7 8	inconvenience caused by this delay. The parties further stipulate that the Court's Scheduling		
9			
10	Order shall be modified accordingly.		
11		Respectfully submitted,	
12	Dated: <u>11/15/17</u>	<u>/s/ Donald H. Medearis</u> DONALD H. MEDEARIS	
13		BAY AREA LEGAL AID	
14		Attorney for Plaintiff	
15	Dated: <u>11/15/17</u>	BRIAN J. STRETCH United States Attorney	
16		DEBORAH LEE STACHEL,	
17		Regional Chief Counsel, Region IX Civil Division	
18	By:	<u>/s/ Tina L. Naicker</u>	
19		(* as authorized by e-mail on 11/15/17) TINA L. NAICKER	
20		Special Assistant U.S. Attorney	
21		Attorneys for Defendant	
22	ODDED.		
23	ORDER:		
24	APPROVED AND SO ORDERED	By Rich Sechar	
25	Dated: <u>11/20/17</u>	By:	
26		SEEBORG	
27		United States District Judge	
28	STIPULATION TO THIRD EXTENSION OF TIME FOR PLAINTIFF TO FILE MOTION FOR SUMMARY JUDGMENT, AND PROPOSED ORDER; CASE NO. 3:17-CV-01502- RS		
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