

1 BARBARA MARIE RIZZO (CSBN 172999)  
 Attorney At Law  
 2 P. O. Box 383103  
 Waikoloa, HI 96738  
 3 Telephone: 808-785-6088  
 Fax: 808-440-0699  
 4 E-Mail: mail@fedlaborlaw.com

5 Attorney for Plaintiff Stanley J. Ciletti

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 7 UNITED STATES DISTRICT COURT  
 8 NORTHERN DISTRICT OF CALIFORNIA  
 9 SAN FRANCISCO DIVISION  
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11 STANLEY J. CILETTI, M.D., ) ) 12 Plaintiff, ) ) 13 v. ) ) 14 NANCY A. BERRYHILL, Acting ) Commissioner of Social Security, ) 15 ) 16 Defendant. ) ) 17 _____)	Case No.: 3:17-CV-05646-EMC  STIPULATION AND [ <del>PROPOSED</del> ] ORDER FOR AN EXTENSION OF TIME FOR PLAINTIFF TO FILE HIS MOTION FOR SUMMARY JUDGMENT AND REPLY
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18 IT IS HEREBY STIPULATED, by and between the parties, through their  
 19 respective counsel, that Plaintiff shall have an extension of time of an  
 20 additional 18 days to file his motion for summary judgment and an  
 21 additional 21 days to file his reply brief. This is the first continuance  
 22 sought by Plaintiff.

23 On October 2, 2017, the Court issued a Procedural Order for Social  
 24 Security Review Actions. [Docket No. 5]. The Order states that Plaintiff  
 25 shall file a motion for summary judgment within 28 days of service of  
 26 Defendant's answer. Defendant filed the answer on January 8, 2018. [Docket  
 27 No. 12]. Therefore, Plaintiff's motion for summary judgment is currently  
 28 due on February 5, 2018. Plaintiff seeks a brief extension of time of 18

1 days to file his motion for summary judgment. The new due date for  
2 Plaintiff's motion for summary judgment will be February 23, 2018.

3 There is good cause for this request. Plaintiff's counsel has been  
4 out sick for several days this month. Moreover, the Administrative Record  
5 in this case is larger than most Social Security cases in that it contains  
6 over 1,600 pages including over 1,300 pages of medical records. Plaintiff's  
7 counsel did not represent Plaintiff in any administrative proceedings;  
8 therefore, counsel must familiarize herself with the voluminous medical  
9 records before filing the motion for summary judgment. Plaintiff is  
10 respectfully requesting additional time up to and including February 23,  
11 2018 to fully review the administrative record and research the issues.

12 With the additional time for Plaintiff to file his motion for summary  
13 judgment, the Defendant's opposition will now be due on March 23, 2018, and  
14 Plaintiff's reply brief will be due on April 6, 2018. Plaintiff's counsel  
15 respectfully requests an additional 21 days to file Plaintiff's reply brief.  
16 There is good cause for this request. Plaintiff's counsel will be out of  
17 the office and out of the country for the entire month of March and the  
18 beginning of April, returning to the office on April 9, 2018. With the 21-  
19 day extension, Plaintiff's reply brief will now be due on April 27, 2018.  
20 These requests for extensions of time are made in good faith with no  
21 intention to unduly delay the proceedings.  
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24 Respectfully submitted,

25 Date: January 31, 2018

"/s/Gina Tomaselli"

(As authorized by e-mail on 1/31/2018

GINA TOMASELLI

Attorney for Defendant

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28 Date: January 31, 2018

"/s/Barbara Marie Rizzo"

BARBARA MARIE RIZZO

Attorney for Plaintiff

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ORDER

APPROVED AND SO ORDERED:

DATED: 2/13/18

HONORABLE EDWARD M. CHEN  
U.S. DISTRICT COURT

