

1 Robert C. Weems (SBN 148156)
 2 WEEMS LAW OFFICES
 3 769 Center Blvd., PMB 38
 4 Fairfax, CA 94930
 5 Ph: (415) 881-7653
 6 Fx: (866) 610-1430
 7 rcweems@weemslawoffices.com

8 Attorney for Plaintiff

9 UNITED STATES DISTRICT COURT
 10 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 11 OAKLAND DIVISION

12 SUSAN CAROL NIELSEN,
 13 Plaintiff,
 14 v.
 15 MICHAEL J. ASTRUE, Commissioner
 16 of Social Security,
 17 Defendant

Case No: **4:11-cv-03379-SBA**
 MOTION FOR EXTENSION OF TIME
 [Fed.R.Civ.P. 6]

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 20 WHEREAS, counsel of record Robert C. Weems (CA Bar # 148156) has agreed to
 21 the purchase of the deceased sole practitioner, Mr. Sammis, practice and active cases in
 22 this court and to avoid prejudice to Plaintiff by reason of such inadvertence, due to taking
 23 on additional Social Security civil cases on counsel's part, to submit a timely motion for
 24 summary judgment;

25 WHEREAS, counsel requires sufficient time to draft the required motion for
 26 summary judgment and this is Plaintiff's first request to extend time;

1 WHEREAS, it is appropriate under the circumstances for counsel to be provided
2 with reasonable time to satisfy his non-delegable duties to the Court. See, FRCP 11;
3 *Unioil, Inc. v. E.F. Hutton & Co.*, 809 F.2d 548, 558 (9th Cir.1986); and,

4 WHEREAS, Defendant does not oppose Plaintiff's motion.

5 NOW, WHEREFORE, Plaintiff moves for a forty-five (45) days extension of all
6 deadlines in this action.

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8 For Plaintiff:

9 WEEMS LAW OFFICES

10 /S/Robert C. Weems

11 Robert C. Weems, Attorney for
12 Plaintiff on behalf of Ian M. Sammis

13 SO ORDERED:

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15 DATE: 12/28/11

16 Sandra Brown Armstrong

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JUDGE OF THE UNITED STATES
DISTRICT COURT