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 8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10 OAKLAND DIVISION

11 SYED ABU TAHIR,)	Case No. 4:18-cv-03675-HSG
)	
12 Plaintiff,)	STIPULATION AND PROPOSED ORDER FOR A SECOND EXTENSION OF TIME FOR PLAINTIFF TO FILE MOTION FOR SUMMARY JUDGMENT
13 vs.)	
14 NANCY A. BERRYHILL, Acting)	
15 Commissioner of the Social Security Administration,)	
16 Defendant.)	
17)	

18
 19 IT IS HEREBY STIPULATED, by and between the parties, through their respective
 20 counsel of record, that Plaintiff shall have a second extension of time of 28 days to file his
 21 Motion for Summary Judgment (MSJ) in response to Defendant’s Answer. The Court
 22 previously granted Plaintiff’s request for an extension of 60 days to file his MSJ, so that
 23 Plaintiff, who was then Pro Se, would have time to seek counsel. Plaintiff has now obtained
 24 counsel and counsel substituted in as Plaintiff’s attorney today. Plaintiff’s attorney requests
 25 an extension because he will be representing clients at two already-scheduled Social Security
 26

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 28 STIPULATION TO A SECOND EXTENSION OF TIME FOR PLAINTIFF TO FILE
 MOTION FOR SUMMARY JUDGMENT, AND ~~PROPOSED~~ ORDER; CASE NO. 4:18-
 CV-03675-HSG

1 administrative hearings this Thursday, May 9, a Reply brief due in another United States
2 District Court case on May 10, 2019, and a heavy caseload.

3 The current due date for Plaintiff's Motion for Summary Judgment is Monday, May
4 13, 2019. The new due date for filing Plaintiff's Motion for Summary Judgment would be
5 Monday, June 10, 2019. The Commissioner's Motion would then be due on or before
6 Monday, July 8, 2019.
7

8 Plaintiff and Plaintiff's attorney sincerely apologize to the Court and to the Defendant
9 for any inconvenience caused by this delay. The parties further stipulate that the Court's
10 Scheduling Order shall be modified accordingly.
11

12 Respectfully submitted,

13 Dated: 05/06/2019

/s/ Donald H. Medearis
DONALD H. MEDEARIS
Attorney for Plaintiff

15
16 Dated: 05/06/2019

17 DAVID L. ANDERSON
United States Attorney
18 DEBORAH STACHEL,
Regional Chief Counsel Region IX
19 By: /s/ Sharon Lahey
(*as authorized by e-mail on 05/06/2019)
20 SHARON LAHEY,
Assistant Regional Counsel
21 Attorneys for Defendant
22

23 ORDER:

24 APPROVED AND SO ORDERED

25 Dated: 5/7/2019

26 By: Haywood S. Gilliam, Jr.
THE HONORABLE HAYWOOD S.
GILLIAM, JR.
27 United States District Judge

28 STIPULATION TO A SECOND EXTENSION OF TIME FOR PLAINTIFF TO FILE
MOTION FOR SUMMARY JUDGMENT, AND ~~PROPOSED~~ ORDER; CASE NO. 4:18-
CV-03675-HSG