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8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA

10 MARTIN ERIC FINDLEY,

11 Plaintiff,

12 vs.

13 CAROLYN W. COLVIN,  
 14 Acting Commissioner of  
 15 Social Security,  
 16 Defendant.

17 ) CIVIL NO. 5:14-CV-03581-BLF

) STIPULATION AND PROPOSED  
 ) ORDER EXTENDING DEFENDANT’S  
 ) TIME TO FILE A RESPONSE TO  
 ) PLAINTIFF’S MOTION FOR  
 ) SUMMARY JUDGMENT AND  
 ) MEMORANDUM OF POINTS AND  
 ) AUTHORITIES  
 ) (Defendant’s Second Extension Request)

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 19 Defendant Carolyn W. Colvin, Acting Commissioner of the Social Security Administration  
 20 (“Defendant”) respectfully request the Court to extend the time for Defendant to file her response to  
 21 Plaintiff’s Motion For Summary Judgment and Memorandum of Points and Authorities, due on July 30,  
 22 2015, by 14 days, through and including August 13, 2015.

23 Pursuant to Civil L.R. 6-2, the undersigned states the following:

24 (1) Defendant’s counsel has contacted the client agency, which is the Office of Disability  
 25 Adjudication and Review, Appeals Council in writing to explore settlement options.

26 (2) The client has informed me that they are in the process of considering the defensibility of  
 27 this case and need additional time to complete their review. I expect a response within two weeks, and  
 28 will need further time to consult with opposing counsel.

Stipulation re: extension, 5:14-cv-03581-BLF

1 (3) Plaintiff's Reply brief, if necessary will be due on August 27, 2015.

2 (4) Plaintiff has had one extension of the briefing schedule of 28 days, and an extension of 45  
3 days for service of the summons by U.S. Marshall. Defendant has had one extension of the briefing  
4 schedule of 28 days.

5 (5) Pursuant to the Court's scheduling order (ECF Doc. #3), the matter will be submitted for  
6 decision without oral argument, thus an extension of time will not require vacating a hearing date.

7 (6) Counsel for Defendant conferred with Plaintiff's counsel, who has no opposition to the  
8 requested extension on July 23, 2015.

9 (7) This request is made in good faith with no intention to unduly delay the proceedings.

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12 Respectfully submitted,

13 MELINDA L. HAAG  
14 United States Attorney

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16 Dated: July 24, 2015

17 By: /s/Richard M. Rodriguez  
18 RICHARD M. RODRIGUEZ  
19 Special Assistant United States Attorney  
20 Attorney for Defendant

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28 Dated: July 24, 2015

/s/Lisa S. Douglass  
Attorney for Plaintiff\*  
(\*by email authorization on June 23, 2015)