1 JESSE S. KAPLAN CSB#103726 E-Filed 1/27/16 5441 Fair Oaks Bl. Ste. C-1 2 Carmichael, CA 95608 916/488-3030 3 916/489-9297 fax 4 **Attorney for Plaintiff** 5 KIMBERLY DICKENS 6 7 8 UNITED STATES DISTRICT COURT 9 10 NORTHERN DISTRICT OF CALIFORNIA 11 SAN JOSE DIVISION 12 -o0O0o-13 14 KIMBERLY DICKENS, No. 5:15-cv-03711-BLF-NMC 15 Plaintiff, 16 STIPULATION AND [proposed] ORDER FOR EXTENSION OF 17 PLAINTIFF'S TIME TO FILE 18 **MOTION FOR SUMMARY** v. **JUDGMENT** 19 **CAROLYN COLVIN, Acting** Commissioner of Social Security, 20 21 Defendant. 22 IT IS HEREBY STIPULATED by and between the parties, through their respective 23 24 undersigned attorneys, and with the permission of the Court, that plaintiff's time to file a motion 25 for summary judgment is extended one day to February 15, 2016. 26 This request is based on plaintiff's council's workload and previous unfamiliarity with 27 the record. 28 [Pleading Title] - 1

1 2 Dated: January 25, 2016 /s/ Jesse S. Kaplan JESSE S. KAPLAN 3 Attorney for Plaintiff 4 BENJAMIN B. WAGNER 5 United States Attorney DEBORAH LEE STACHEL 6 Acting Regional Counsel, Region IX 7 Social Security Administration 8 9 _/s/ per e-mail authorization Dated: January 25, 2016 10 Michael Marriott 11 Special Assistant U.S. Attorney Attorney for Defendant 12 13 14 15 **ORDER** 16 17 For good cause shown on the basis of this stipulation, the requested extension of 18 plaintiff's time to file a motion for summary judgment brief is extended to February 15, 2016. 19 SO ORDERED. 20 21 22 Dated: _ 1/27/16 23 NATHANEAL M. CÖUSINS 24 UNITED STATES MAGISTRATE JUDGE 25 26 27 28