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9
10 UNITED STATES DISTRICT COURT
11 EASTERN DISTRICT OF CALIFORNIA
12 FRESNO DIVISION

13 ELIZABETH ROMERO,) No. 1:14-cv-01080-GSA
14)
Plaintiff,) **STIPULATION AND PROPOSED ORDER**
15) **FOR A FIRST EXTENSION OF TIME**
16 v.) **FOR DEFENDANT TO FILE HER**
) **MOTION FOR SUMMARY JUDGMENT**
17 CAROLYN W. COLVIN,)
Acting Commissioner of Social Security,)
18)
19 Defendant.)
20)

21 IT IS HEREBY STIPULATED by the parties, through their undersigned attorneys, and
22 with the approval of the Court, that Defendant shall have a first extension of time of 30 days to
23 file her motion for summary judgment. Defendant respectfully requests this additional time
24 because he has a very heavy workload despite due diligence.

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27
28 Stip. to Extend Def.'s MSJ

1 The new due date for Defendant's motion for summary judgment will be Friday, June 19,
2 2015.

3 Respectfully submitted,

4 Date: May 26, 2014

FORSLUND LAW

6 By: /s/ Jacqueline Anna Forslund *
JACQUELINE ANNA FORSLUND
7 * By email authorization on May 26, 2015
Attorney for Plaintiff

8 Date: May 26, 2014

BENJAMIN B. WAGNER
United States Attorney

10 By: /s/ Jeffrey Chen
JEFFREY CHEN
11 Special Assistant United States Attorney
12 Attorneys for Defendant

13 ORDER

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15 Based on the stipulation between the parties, Defendant may have an extension of time to
16 file her opposition brief. Defendant shall file her opposition brief no later than June 19, 2015.
17
18 Plaintiff may file her reply brief no later than July 6, 2015.

19
20 IT IS SO ORDERED.

21 Dated: May 27, 2015

/s/ Gary S. Austin
22 UNITED STATES MAGISTRATE JUDGE