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	Acting Regional Chief Counsel, Region IX			
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9	Attorneys for Defendant			
10	UNITED STATES DISTRICT COURT EASTERN DISTRICT OF CALIFORNIA			
11	FRESNO DIVISION			
12	MAI CHANG,) Case No. 1:15-cv-0310-EPG			
13)			
14	Plaintiff,) STIPULATION AND ORDER TO) EXTEND BRIEFING SCHEDULE			
15	v.)			
16	CAROLYN W. COLVIN)			
17	Acting Commissioner of Social Security,			
18	Defendant.			
)			
19	IT IS HEREBY STIPULATED by the parties, through their undersigned attorneys, to			
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21	extend Defendant's time to file her response to Plaintiff's opening brief by 35 days to March 2 ,			
22	2016 , and that all other scheduling dates set forth in the Court's Case Management Order shall			
23	be extended accordingly. This is Defendant's second request for an extension of time in this			
24	matter. ¹			
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27	¹ The Commissioner first sought an extension in this case because the Social Security Administration's Office of Disability Adjudication and Review was unable to prepare a complete certified administrative record.			
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1	There is good cause for this extension because counsel for Defendant requires additional		
2	time to properly consider and research the issues presented in Plaintiff's opening brief.		
3	Furthermore, additional time is required because counsel for Defendant is responsible for		
4	drafting various pleadings before the district courts within the Ninth Circuit, negotiating or		
5	litigating attorney fee matters pursuant to the Equal Access to Justice Act, and conducting		
6	discovery in a personnel-related litigation matter pending before the Equal Employment		
7	Opportunity Commission.		
8	Counsel for Defendant apologizes to the Court for any inconvenience caused by this		
9	delay.		
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11		Respectfully submitted,	
12			
13	Date: January 26, 2016	LAW OFFICES OF LAWRENCE D. ROHLFING	
14	By:	/s/ Asim H. Modi_for Monica Perales*	
15	by.	MONICA PERALES	
16		*Authorized by email on January 26, 2016 Attorneys for Plaintiff	
17	Date: January 26, 2016	BENJAMIN B. WAGNER	
18	Date. <u>Junuary 20, 2010</u>	United States Attorney	
19		DEBORAH LEE STACHEL Acting Regional Chief Counsel, Region IX	
20		Social Security Administration	
21	By:	/s/ Asim H. Modi	
22		ASIM H. MODI Special Assistant United States Attorney	
23		Attorneys for Defendant	
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1	ORDER		
2	Pursuant to the parties' stipulation (Doc. 19), the Commissioner's response to Plaintiff's		
3	opening brief shall be filed no later than March 2, 2016. Any reply may be filed within fifteen		
4	days of the filing of the opposition.		
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7	IT IS SO ORDERED.		
8	Dated: January 27, 2016 /s/ Encir P. Group		
9	UNITED STATES MAGISTRATE JUDGE		
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