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

12 MAI CHANG,) Case No. 1:15-cv-0310-EPG
13)
Plaintiff,) **STIPULATION AND ORDER TO**
14) **EXTEND BRIEFING SCHEDULE**
v.)
15)
16 CAROLYN W. COLVIN)
Acting Commissioner of Social Security,)
17)
Defendant.)
18)
19

20 IT IS HEREBY STIPULATED by the parties, through their undersigned attorneys, to
21 extend Defendant's time to file her response to Plaintiff's opening brief by **28 days** to **March 30,**
22 **2016**, and that all other scheduling dates set forth in the Court's Case Management Order shall
23 be extended accordingly.

24 On January 28, 2016, the parties stipulated to an extension of the briefing schedule to
25 allow counsel for Defendant additional time to properly consider and research the issues
26 presented in Plaintiff's opening brief. However, there is good cause for this extension because
27 Defendant is currently pursuing the possibility of settlement and voluntary remand in this case.
28 Accordingly, Defendant needs additional time to prepare her responsive brief, if necessary. This

1 request is made in good faith and is not intended to unnecessarily delay these proceedings.
2 Counsel for Defendant sincerely apologizes to the Court and to Plaintiff for any inconvenience
3 caused by this extension.
4

5 Respectfully submitted,

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7 Date: March 1, 2016

LAW OFFICES OF LAWRENCE D.
ROHLFING

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9 By: /s/ Asim H. Modi for Monica Perales*
10 MONICA PERALES
11 *Authorized by email on March 1, 2016
12 Attorneys for Plaintiff

13
14 Date: March 1, 2016

BENJAMIN B. WAGNER
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16 By: /s/ Asim H. Modi
17 ASIM H. MODI
18 Special Assistant United States Attorney
19 Attorneys for Defendant

20 ORDER

21 Based on the above stipulation, and good cause appearing therein, the Court grants
22 Defendant an extension to file her opposition to Plaintiff's opening brief. Defendant shall file her
23 brief no later than **March 30, 2016**. Plaintiff may file her reply brief no later than **April 14,**
24 **2016.**

25 IT IS SO ORDERED.

26 Dated: March 2, 2016

/s/ Eric P. Gray
UNITED STATES MAGISTRATE JUDGE