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9 Attorneys for Defendant

10 **UNITED STATES DISTRICT COURT**
11 **EASTERN DISTRICT OF CALIFORNIA**

12 NORMA JEAN ORNELLAS,) Case No.: 1:15-cv-00730-EPG
13)
Plaintiff,) **STIPULATION AND ORDER**
14) **FOR AN EXTENSION OF TIME**
vs.)
15)
16 CAROLYN W. COLVIN, Acting)
Commissioner of Social Security,)
17)
Defendant.)

18
19 Defendant CAROLYN W. COLVIN, Acting Commissioner of Social Security, through
20 her counsel of record, hereby moves the Court to extend the time from March 4, 2016, to April 4,
21 2016, for Defendant to file her opposition, and to extend the remaining case deadlines
22 accordingly.

23
24 There is good cause for extending the case deadlines because Counsel has an unusually
25 robust caseload, which includes active discovery in an employment matter and Bankruptcy
26 representation. Additional time is needed to responsibly respond to Plaintiff's contentions.
27 Counsel apologizes to the Court for any inconvenience that this may cause and assures all parties
28 that she has taken every action to minimize it.

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Respectfully submitted,

Dated: February 25, 2016

BENJAMIN B. WAGNER
United States Attorney
DEBORAH LEE STACHEL
Acting Regional Chief Counsel, Region IX
Social Security Administration

By /s/ Heather M. Moss
HEATHER M. MOSS
Special Assistant U.S. Attorney
Attorneys for Defendant

Date: February 25, 2016

JACQUELINE A. FORSLUND
Attorney at Law

/s/Jacqueline A. Forslund*
JACQUELINE A. FORSLUND
[*By email authorization]
Attorney for Plaintiff

ORDER

Pursuant to the stipulation, Defendant's opposition shall be filed no later than **April 4, 2016**. Any reply shall be filed within fifteen days of the filing of the opposition.

IT IS SO ORDERED.

Dated: February 26, 2016

/s/ Eric P. Grogan
UNITED STATES MAGISTRATE JUDGE