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

14 YVONNE SIMON,) No. 1:15-cv-01239-EPG
15 Plaintiff,)
16 v.) **STIPULATION AND ORDER FOR A**
17) **FIRST EXTENSION OF TIME FOR**
18 CAROLYN W. COLVIN,) **DEFENDANT TO FILE HER MOTION**
Acting Commissioner of Social Security,) **FOR SUMMARY JUDGMENT**
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 of a heavy accumulated workload as a result of a two week absence from the office in
25 Taiwan after the passing of the undersigned's grandfather.

1 The new due date for Defendant's motion for summary judgment will be Thursday,
2 August 4, 2016.

3
4 Respectfully submitted,
5 Date: July 4, 2016 DELLERT BAIRD LAW OFFICES, PLLC

6 By: /s/ Kelsey Brown*
7 KELSEY MACKENZIE BROWN
8 * By email authorization on July 4, 2016
Attorney for Plaintiff

9 Date: July 4, 2016 BENJAMIN B. WAGNER
10 United States Attorney

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

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17 **ORDER**

18 Pursuant to the parties' stipulation, Defendant shall file her Opposition/Motion for
19 Summary Judgment on **August 4, 2016**. Any reply shall be filed within 15 days of the filing of
20 Defendant's pleading.

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22 IT IS SO ORDERED.

23 Dated: July 6, 2016

24 /s/ Eric P. Groj
25 UNITED STATES MAGISTRATE JUDGE
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