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

13	JESSE GUERRA,	)	Case No.: 1:15-cv-01408-SKO
14	Plaintiff,	)	STIPULATION AND ORDER FOR AN
15	vs.	)	EXTENSION OF TIME
16	CAROLYN W. COLVIN,	)	
17	Acting Commissioner of Social Security,	)	
18	Defendant.	)	

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20 IT IS HEREBY STIPULATED, by and between the parties, through their respective  
 21 counsel of record, that the time for Defendant to respond to Plaintiff’s Motion for Summary  
 22 Judgment be extended 30 days to and including July 6, 2016. This is Defendant’s first request  
 23 for an extension of time to respond to Plaintiff’s motion. Defense counsel needs the additional  
 24 time to further review the file and prepare a response in this matter due to a heavy workload,  
 25 including several other district court cases and other substantive work in the areas of bankruptcy  
 26 and civil rights, despite due diligence.

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1 The parties further stipulate that the remaining dates in the Court's Scheduling Order  
2 shall be modified accordingly.

3 Defense counsel apologizes to the Court for any inconvenience caused by this delay.

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5 Respectfully submitted,

6 Dated: June 3, 2016

/s/ Lynn Harada for Vijay J. Patel\*  
(\*as authorized via email on 6/3/16)  
VIJAY J. PATEL  
Attorney for Plaintiff

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9  
10 Dated: June 3, 2016

PHILLIP A. TALBERT  
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14 By: /s/ Lynn M. Harada  
LYNN M. HARADA  
Special Assistant U.S. Attorney

15  
16 Attorneys for Defendant

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19 **ORDER**

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21 Based on the above stipulation of the parties, IT IS HEREBY ORDERED that:

22 1. Defendant is granted an extension of time, up and including July 6, 2016, to file a  
23 responsive brief; and

24 2. Plaintiff may file an optional reply brief on or before July 25, 2016.

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26 IT IS SO ORDERED.

27 Dated: June 7, 2016

/s/ Sheila K. Oberto  
UNITED STATES MAGISTRATE JUDGE

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