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9 Attorney for Plaintiff

10 UNITED STATES DISTRICT COURT
11 EASTERN DISTRICT OF CALIFORNIA

12 ROBERT DAVID TELLEZ,)

13 Plaintiff)

14 v.)

15 CAROLYN W. COLVIN,)
16 Acting Comm'r of Social Security,)

17 Defendant)
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20)
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Case No. 1:15-cv-01693-SMS

**STIPULATION AND PROPOSED
ORDER FOR EXTENSION OF TIME
TO FILE PLAINTIFF'S MOTION
FOR SUMMARY JUDGMENT**

IT IS HEREBY STIPULATED by the parties, through their undersigned attorneys, to extend the time 30 Days to September 3, 2016, for Plaintiff to file his Opening Brief, in accordance with the Court's Scheduling Order. This is Plaintiff's first request for an extension. This extension is requested because Plaintiff's counsel has several Ninth Circuit briefs due in the next couple of weeks and is experiencing a heavier than usual work load.

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

3 Respectfully submitted,

4 Date: August 4, 2016

JACQUELINE A. FORSLUND
Attorney at Law

6 /s/Jacqueline A. Forslund
7 JACQUELINE A. FORSLUND

8 Attorney for Plaintiff

9
10 Date: August 4, 2016

PHILLIP A. TALBERT
Acting United States Attorney
DEBORAH STACHEL
Acting Regional Chief Counsel, Region IX
Social Security Administration

13 /s/Carolyn Chen
14 CAROLYN CHEN
15 Special Assistant United States Attorney
*By email authorization

16 Attorney for Defendant

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18 ORDER

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20 IT IS SO ORDERED.

21 Dated: August 5, 2016

/s/ Sandra M. Snyder
22 UNITED STATES MAGISTRATE JUDGE