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8 Attorneys for DEFENDANT
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10 UNITED STATES DISTRICT COURT
11 EASTERN DISTRICT OF CALIFORNIA
12 FRESNO DIVISION

13 JEAN R. OLIVERAS,) CIVIL NO. 1:16-cv-00015-GSA
14)
Plaintiff,)
15) **STIPULATION AND ORDER FOR**
vs.) **EXTENSION OF TIME TO RESPOND**
16) **TO MOTION FOR SUMMARY**
CAROLYN W. COLVIN, Acting) **JUDGMENT**
17 Commissioner Of Social Security,)
18)
Defendant.)
19)
20

21 IT IS HEREBY STIPULATED, by and between Jean R. Oliveras (Plaintiff) and Carolyn W.
22 Colvin, Acting Commissioner of Social Security (Defendant), by and through their respective counsel of
23 record, that Defendant shall have a first extension of time of 30 days to respond to Plaintiff's motion for
24 summary judgment and/or to file any cross-motions thereto. The current deadline is September 26, 2016
25 and the new deadline would be October 26, 2016. The deadline for any reply would be November 10,
26 2016. Defense counsel requests this extension of time due to unanticipated leave from the office and an
27 especially heavy caseload, which includes twelve district-court dispositive motions prior to the
28 requested deadline.

1 The Parties further stipulate that the Court's Scheduling Order shall be modified accordingly.

2 Respectfully submitted,

3
4 Dated: September 26, 2016

LAW OFFICES OF LAWRENCE D. ROHLFING

5 By: /s/ Young Cho*

6 YOUNG CHO

7 Attorney for the Plaintiff

(As authorized by email on September 26, 2016).

8 Attorneys for Plaintiff

9
10 Dated: September 26, 2016

PHILLIP A. TALBERT

11 United States Attorney

12 DEBORAH LEE STACHEL

Regional Chief Counsel, Region IX

13 Social Security Administration

14 By: /s/ Sharon Lahey

15 SHARON LAHEY

16 Special Assistant U.S. Attorney

17 Attorneys for Defendant

18 **ORDER**

19 Good cause appearing, pursuant to stipulation, Defendant shall file her response to plaintiff's
20 motion for summary judgment on or before October 26, 2016. Any reply thereto shall be filed on or
21 before November 10, 2016.

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24 IT IS SO ORDERED.

25
26 Dated: September 27, 2016

/s/ Gary S. Austin

27 UNITED STATES MAGISTRATE JUDGE

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