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8 UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
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11 Boshra AL-BAYATI,

12 Plaintiff

13 vs.

14 Carolyn W. Colvin, Acting Commissioner of Social
Security,

15 Defendant
16

No. 2-14-cv-02251-DAD

**STIPULATION AND ORDER TO EXTEND
DUE DATE OF PLAINTIFF'S BRIEF IN
SUPPORT OF HER MOTION FOR
SUMMARY JUDGMENT**

17 Plaintiff, by and through her attorney of record, and Defendant, by and through her attorney of
18 record, hereby stipulate, subject to the approval of the Court, to a 60-day extension of time for Plaintiff's
19 counsel to file a brief in support of her Motion for Summary Judgment, in light of the following:

- 20 1. Plaintiff's counsel is a sole practitioner and has other matters with approaching deadlines.
21 The transcript in this proceeding is lengthy. Plaintiff's counsel needs additional time to
22 review the transcript and to write the Motion.
- 23 2. Plaintiff's counsel has emailed Theophous Reagans, Esq., defendant's counsel, and he has
24 indicated that he is agreeable to a 60 day extension of time for counsel to prepare her
25 brief.
- 26 3. Should the request be granted, Plaintiff's brief will be due on April 20, 2015, Defendant's
27 reply brief on May 20, 2015 and Plaintiff's optional response brief on June 9, 2015.
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Dated: February 19, 2015

Respectfully submitted,

/s/ Geri N. Kahn
GERI N. KAHN
Attorney for Plaintiff

Dated: February 19, 2015

/s/ Theophous Reagans
THEOPHOUS REAGANS, ESQ.
Special Assistant United States Attorney
(*By email authorization on 02/19/2015)

ORDER

Pursuant to the parties' stipulation, IT IS SO ORDERED.

Dated: February 20, 2015


DALE A. DROZD
UNITED STATES MAGISTRATE JUDGE

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