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11 UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF CALIFORNIA

13 Boshra AL-BAYATI,

14 No. 2-14-cv-02251-DAD

15 Plaintiff

16 vs.

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

21 Carolyn W. Colvin, Acting Commissioner of Social
22 Security,

23 Defendant

24 Plaintiff, by and through her attorney of record, and Defendant, by and through her attorney of
25 record, hereby stipulate, subject to the approval of the Court, to a 45-day extension of time for Plaintiff's
26 counsel to file a brief in support of her Motion for Summary Judgment, in light of the following:

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1. Plaintiff's counsel's father passed away on March 30, 2015, due to complications of
2. Alzheimer's disease. The month prior to this was a steady decline in his health and
3. counsel has been out of the office a great deal. Counsel has not had time to work on the
4. brief.
2. Plaintiff's counsel has spoken with Theophous Reagans, Esq., defendant's counsel, and he
3. has indicated that he is agreeable to a 45 day extension of time for counsel to prepare her
4. brief.

1 3. Should the request be granted, Plaintiff's brief will be due on June 4, 2015, Defendant's
2 reply brief on July 6, 2015 and Plaintiff's optional response brief on July 20, 2015.
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5 Dated: April 20, 2015

6 Respectfully submitted,
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10 _____
11 /s/ Geri N. Kahn
12 GERI N. KAHN
13 Attorney for Plaintiff
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15 Dated: April 20, 2015

16 _____
17 /s/ Theophous Reagans
18 THEOPHOUS REAGANS, ESQ.
19 Special Assistant United States Attorney
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21 Dated: April 21, 2015

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23 
24 DALE A. DROZD
25 UNITED STATES MAGISTRATE JUDGE
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