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8 UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA  
10

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 45-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's father passed away on March 30, 2015, due to complications of  
21 Alzheimer's disease. The month prior to this was a steady decline in his health and  
22 counsel has been out of the office a great deal. Counsel has not had time to work on the  
23 brief.
- 24 2. Plaintiff's counsel has spoken with Theophous Reagans, Esq., defendant's counsel, and he  
25 has indicated that he is agreeable to a 45 day extension of time for counsel to prepare her  
26 brief.  
27  
28

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

Respectfully submitted,

Dated: April 20, 2015

/s/ Geri N. Kahn

GERI N. KAHN

Attorney for Plaintiff

Dated: April 20, 2015

/s/ Theophous Reagans

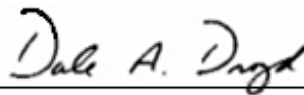
THEOPHOUS REAGANS, ESQ.

Special Assistant United States Attorney

**ORDER**

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

Dated: April 21, 2015



DALE A. DROZD

UNITED STATES MAGISTRATE JUDGE

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