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10 UNITED STATES DISTRICT COURT  
 11 EASTERN DISTRICT OF CALIFORNIA  
 12 SACRAMENTO DIVISION

14	VYACHESLAV HRYZHUK,	)	No. 2:14-cv-02561-EFB
		)	
15	Plaintiff,	)	<b>STIPULATION AND PROPOSED ORDER</b>
		)	<b>FOR A FIRST EXTENSION OF TIME</b>
16	v.	)	<b>FOR DEFENDANT TO FILE HER</b>
		)	<b>MOTION FOR SUMMARY JUDGMENT</b>
17	CAROLYN W. COLVIN,	)	
18	Acting Commissioner of Social Security,	)	
		)	
19	Defendant.	)	
20		)	

21 IT IS HEREBY STIPULATED by the parties, through their undersigned attorneys, and  
 22 with the approval of the Court, that Defendant shall have a first extension of time of 30 days to  
 23 file her motion for summary judgment. Defendant respectfully request this additional time  
 24 because he has a very heavy workload despite due diligence in managing his calendar and  
 25 because of a preplanned vacation upcoming this month.

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 28 Stip. to Extend Def.'s MSJ

1 The new due date for Defendant's motion for summary judgment will be Monday,  
2 August 10, 2015.

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4 Respectfully submitted,

5 Date: July 9, 2015

JESSE S. KAPLAN, ATTORNEY AT LAW

6 By: /s/ Jesse S. Kaplan\*

JESSE S. KAPLAN

7 \* By email authorization on July 9, 2015

8 Attorney for Plaintiff

9 Date: July 9, 2015

BENJAMIN B. WAGNER  
10 United States Attorney

11 By: /s/ Jeffrey Chen

JEFFREY CHEN

12 Special Assistant United States Attorney

13 Attorneys for Defendant

14  
15  
16  
17 ORDER

18  
19 APPROVED AND SO ORDERED.

20 DATED: July 13, 2015.



EDMUND F. BRENNAN

21 UNITED STATES MAGISTRATE JUDGE

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28 Stip. to Extend Def.'s MSJ