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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 SECOND 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 second extension of time of 45 days  
 23 to file her motion for summary judgment. Defendant apologizes for accidentally miscalendaring  
 24 this case schedule and respectfully request this additional time because he has a very heavy  
 25 workload and because of an upcoming ten day vacation around Labor Day.

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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 Thursday,  
2 September 24, 2015.

3  
4 Respectfully submitted,

5 Date: September 2, 2015

JESSE S. KAPLAN, ATTORNEY AT LAW

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

JESSE S. KAPLAN

7 \* By email authorization on Sept. 2, 2015

8 Attorney for Plaintiff

9 Date: September 2, 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: September 8, 2015

21   
EDMUND F. BRENNAN

22 UNITED STATES MAGISTRATE JUDGE  
23  
24  
25  
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27 Stip. to Extend Def.'s MSJ  
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