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7 **Trosalind L. Caldwell**

8 **UNITED STATES DISTRICT COURT**
9 **FOR THE EASTERN DISTRICT OF CALIFORNIA**

10 **Trosalind L. Caldwell,**) **Case No.: 2:15-CV-1002-KJN**
11 Plaintiff)
12) **STIPULATION FOR AN EXTENSION**
13 v.) **OF TIME TO FILE PLAINTIFF'S**
14) **MOTION FOR SUMMARY JUDGMENT**
15 **CAROLYN W. COLVIN,**) **AND/OR REMAND AND**
16 Acting Commissioner of Social Security) **ORDER THEREON**
17 Defendant.)

18 The parties, though counsel, stipulate to a 60-day extension of time in which plaintiff may file
19 her Motion for Summary Judgment and/or Remand of the Commissioner's Final Decision to
20 December 5, 2015. I request the extension due to the fact that at the present time my case load is very
21 large, and I have been working 6 to 7 days per week to keep up with the workload. I have hired a new
22 associate attorney to assist me but she has been at my office for only 25 days and has yet been able to
23 handle some of my cases. I will be 72 years old in 6 weeks and I cannot work at this pace much
24 longer. I was advised by my primary care doctor on May 29, 2015 to stop working or risk not be able
25 to see my grandchildren grow up. It was then that I advertised for an attorney associate but it took
26 time to find a suitable candidate. I need the extra time so I can prepare a quality product for my
27 client. Defendant's counsel has agreed to a 60-day extension. All remaining deadlines will be
28 extended accordingly.

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Respectfully submitted,

Dated: October 5, 2015

/s/ Richard A. Whitaker
Richard Allen Whitaker, Esq.
Attorney for Plaintiff

Dated: October 6, 2015

Benjamin B. Wagner
United States Attorney

/s/ Marcelo Illarmo
Marcelo Illarmo
Special Assistant, U.S. Attorney


ORDER

Good cause having been shown, the parties' stipulation (ECF No. 17) is APPROVED.

Plaintiff shall have until December 5, 2015 to file her motion for summary judgment, with all other deadlines extended accordingly.

IT IS SO ORDERED.

Dated: October 8, 2015


KENDALL J. NEWMAN
UNITED STATES MAGISTRATE JUDGE