1 2	SHELLIE LOTT, SBN: 246202 Cerney Kreuze & Lott, LLP		
	42 N. Sutter Street, Suite 400 Stockton, California 95202		
3	Telephone: (209) 948-9384		
4	Facsimile: (209) 948-0706		
5	Attorney for Plaintiff		
6			
7	μνιτές στατ	ES DISTRICT COURT	
8	UNITED STATES DISTRICT COURT		
9	FOR THE EASTERN DISTRICT OF CALIFORNIA		
10		N. 0.15 01100 KDV	
11	JOSEFA RENEE FORTUNEL,	No. 2:15-cv-01198-KJN	
12	Plaintiff,		
13	v.	STIPULATION AND [proposed] ORDER EXTENDING PLAINTIFF'S TIME TO	
14	CAROLYN W. COLVIN, Acting Commissioner of Social Security,	FILE A MOTION FOR SUMMARY JUDGMENT	
15	Defendant.		
16			
10			
10			
	IT IS HEREBY STIPULATED by an	d between the parties, through their respective	
17		d between the parties, through their respective he Court, that Plaintiff's time to file A Motion For	
17 18	undersigned attorneys, with the approval of the		
17 18 19	undersigned attorneys, with the approval of the Summary Judgment in the above-referenced	he Court, that Plaintiff's time to file A Motion For	
17 18 19 20	undersigned attorneys, with the approval of the Summary Judgment in the above-referenced date of November 19, 2015, to December 21,	he Court, that Plaintiff's time to file A Motion For case is hereby extended 30 days from the present due	
17 18 19 20 21	undersigned attorneys, with the approval of the Summary Judgment in the above-referenced date of November 19, 2015, to December 21,	he Court, that Plaintiff's time to file A Motion For case is hereby extended 30 days from the present due 2015. This extension is requested because the writer	
 17 18 19 20 21 22 	undersigned attorneys, with the approval of the Summary Judgment in the above-referenced date of November 19, 2015, to December 21, has a very heaving briefing schedule prior to	he Court, that Plaintiff's time to file A Motion For case is hereby extended 30 days from the present due 2015. This extension is requested because the writer	
 17 18 19 20 21 22 23 	undersigned attorneys, with the approval of the Summary Judgment in the above-referenced date of November 19, 2015, to December 21, has a very heaving briefing schedule prior to ////	he Court, that Plaintiff's time to file A Motion For case is hereby extended 30 days from the present due 2015. This extension is requested because the writer	
 17 18 19 20 21 22 23 24 	undersigned attorneys, with the approval of the Summary Judgment in the above-referenced date of November 19, 2015, to December 21, has a very heaving briefing schedule prior to ////	he Court, that Plaintiff's time to file A Motion For case is hereby extended 30 days from the present due 2015. This extension is requested because the writer	
 17 18 19 20 21 22 23 24 25 	undersigned attorneys, with the approval of the Summary Judgment in the above-referenced of date of November 19, 2015, to December 21, has a very heaving briefing schedule prior to //// ////	he Court, that Plaintiff's time to file A Motion For case is hereby extended 30 days from the present due 2015. This extension is requested because the writer	
 17 18 19 20 21 22 23 24 25 26 	undersigned attorneys, with the approval of the Summary Judgment in the above-referenced of date of November 19, 2015, to December 21, has a very heaving briefing schedule prior to //////////////////////////////////	he Court, that Plaintiff's time to file A Motion For case is hereby extended 30 days from the present due 2015. This extension is requested because the writer	
 17 18 19 20 21 22 23 24 25 26 27 	undersigned attorneys, with the approval of the Summary Judgment in the above-referenced of date of November 19, 2015, to December 21, has a very heaving briefing schedule prior to //////////////////////////////////	he Court, that Plaintiff's time to file A Motion For case is hereby extended 30 days from the present due 2015. This extension is requested because the writer	

1	DATED Neverther 16 2015	DENILAMIN D. WACNED
1	DATED: November 16, 2015	BENJAMIN B. WAGNER United States Attorney
2		DONNA L. CALVERT Regional Chief Counsel, Region IX
3		Regional enter counsel, Region IX
4	/s/ Shellie Lott	/s/ Henry L. Chi
5	SHELLIE LOTT, Attorney for Plaintiff	HENRY L. CHI, (As authorized via E-mail on 11/16/15) Special Assistant U S Attorney Attorneys for Defendant
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7		Attorneys for Defendant
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1 2 3 4 5	SHELLIE LOTT, SBN: 246202 Cerney Kreuze & Lott, LLP 42 N. Sutter Street, Suite 400 Stockton, California 95202 Telephone: (209) 948-9384 Facsimile: (209) 948-0706 Attorney for Plaintiff		
6	Automey for Flamun		
7	UNITED STATES DISTRICT COURT EASTERN DISTRICT OF CALIFORNIA,		
8	SACRAMENTO DIVISION		
9	JOSEFA RENEE FORTUNEL,	No. 2:15-cv-01198-KJN	
10	Plaintiff,		
11	v.	[proposed] ORDER EXTENDING	
12	CAROLYN W. COLVIN, Acting	PLAINTIFF'S TIME TO FILE A MOTION FOR SUMMARY JUDGMENT	
13	Commissioner of Social Security,		
14	Defendant.		
15			
16	Pursuant to the stipulation of the parties showing good cause for a requested first		
17	extension of Plaintiff's time to file a Motion For Summary Judgment, the request is hereby		
18	APPROVED.		
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20			
21	SO ORDERED.		
22	Dated: November 23, 2015		
23		Fordall J. Newman	
24		KENDALL J. NEŴMAN UNITED STATES MAGISTRATE JUDGE	
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