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7 Attorney for Plaintiff

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

10
11 JOSEFA RENEE FORTUNEL,

12 Plaintiff,

13 v.

14 CAROLYN W. COLVIN, Acting
15 Commissioner of Social Security,

16 Defendant.

No. 2:15-cv-01198-KJN

**STIPULATION AND [proposed] ORDER
EXTENDING PLAINTIFF'S TIME TO
FILE A MOTION FOR SUMMARY
JUDGMENT**

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18 IT IS HEREBY STIPULATED by and between the parties, through their respective
19 undersigned attorneys, with the approval of the Court, that Plaintiff's time to file A Motion For
20 Summary Judgment in the above-referenced case is hereby extended 30 days from the present due
21 date of November 19, 2015, to December 21, 2015. This extension is requested because the writer
22 has a very heaving briefing schedule prior to the upcoming holiday engagement with family.

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DATED: November 16, 2015

BENJAMIN B. WAGNER
United States Attorney
DONNA L. CALVERT
Regional Chief Counsel, Region IX

/s/ Shellie Lott
SHELLIE LOTT,
Attorney for Plaintiff

/s/ Henry L. Chi
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 Attorney for Plaintiff

8 UNITED STATES DISTRICT COURT EASTERN DISTRICT OF CALIFORNIA,
9 SACRAMENTO DIVISION

10 JOSEFA RENEE FORTUNEL,
11 Plaintiff,

12 v.

13 CAROLYN W. COLVIN, Acting
14 Commissioner of Social Security,
15 Defendant.

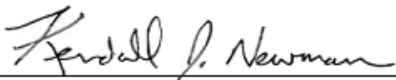
No. 2:15-cv-01198-KJN

**[proposed] ORDER EXTENDING
PLAINTIFF'S TIME TO FILE A MOTION
FOR SUMMARY JUDGMENT**

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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21 SO ORDERED.

22 Dated: November 23, 2015

23 
24 KENDALL J. NEWMAN
25 UNITED STATES MAGISTRATE JUDGE
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