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16 UNITED STATES DISTRICT COURT
17 EASTERN DISTRICT OF CALIFORNIA
18 SACRAMENTO DIVISION

19
20 JIMMIE R. GRANT, JR.,) Case No. 2:15-cv-1455-CKD
21 Plaintiff,)
22) **STIPULATION AND ORDER TO**
23) **EXTEND BRIEFING SCHEDULE**
24 v.)
25)
26 CAROLYN W. COLVIN)
27 Acting Commissioner of Social Security,)
28 Defendant.)

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30 IT IS HEREBY STIPULATED by the parties, through their undersigned attorneys, to
31 extend Defendant's time to file her cross-motion for summary judgment with the Court by 35
32 days to **April 4, 2016**, and that all other scheduling dates set forth in the Court's Case
33 Management Order shall be extended accordingly. This is Defendant's first request for an
34 extension of time in this matter, and she requests it in good faith and without any intent to
35 prolong proceedings unduly.

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37 There is good cause for this extension because counsel for Defendant is responsible for
38 drafting various pleadings before the district courts within the Ninth Circuit, preparing an oral
39 argument before the Ninth Circuit, negotiating or litigating attorney fee matters pursuant to the

1 Equal Access to Justice Act, and conducting discovery in personnel-related litigation pending
2 before the Equal Employment Opportunity Commission.

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4 Respectfully submitted,

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6 Date: February 25, 2016

ROHLFING & KALAGIAN, LLP

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By: /s/ Asim H. Modi for Marc V. Kalagian*

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MARC V. KALAGIAN

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*Authorized by email on February 25, 2016

Attorneys for Plaintiff

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Date: February 25, 2016

BENJAMIN B. WAGNER

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United States Attorney

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DEBORAH L. STACHEL

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Acting Regional Chief Counsel, Region IX

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Social Security Administration

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By: /s/ Asim H. Modi

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Special Assistant United States Attorney

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Attorneys for Defendant

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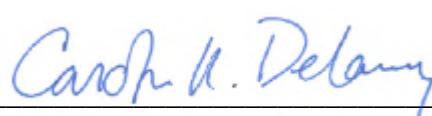
ORDER

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Based on the foregoing joint stipulation, and for cause shown, THE COURT ORDERS
that Defendant shall have until **April 4, 2016** to file her cross-motion for summary judgment,
with all subsequent deadlines set forth in the Court's scheduling order also extended accordingly.

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Dated: February 29, 2016



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CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE

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