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10 UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
11 SACRAMENTO DIVISION

12 JIMMIE R. GRANT, JR.,	) Case No. 2:15-cv-1455-CKD
	)
13 Plaintiff,	) <b>STIPULATION AND ORDER TO</b>
	) <b>EXTEND BRIEFING SCHEDULE</b>
14 v.	)
	)
15 CAROLYN W. COLVIN	)
16 Acting Commissioner of Social Security,	)
	)
17 Defendant.	)
	)

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19  
20 IT IS HEREBY STIPULATED by the parties, through their undersigned attorneys, to  
21 extend Defendant's time to file her cross-motion for summary judgment with the Court by 35  
22 days to **April 4, 2016**, and that all other scheduling dates set forth in the Court's Case  
23 Management Order shall be extended accordingly. This is Defendant's first request for an  
24 extension of time in this matter, and she requests it in good faith and without any intent to  
25 prolong proceedings unduly.

26 There is good cause for this extension because counsel for Defendant is responsible for  
27 drafting various pleadings before the district courts within the Ninth Circuit, preparing an oral  
28 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.

3  
4 Respectfully submitted,

5  
6 Date: February 25, 2016

ROHLFING & KALAGIAN, LLP

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

MARC V. KALAGIAN

8 \*Authorized by email on February 25, 2016

9 Attorneys for Plaintiff

10 Date: February 25, 2016

BENJAMIN B. WAGNER

11 United States Attorney

DEBORAH L. STACHEL

12 Acting Regional Chief Counsel, Region IX

13 Social Security Administration

14 By: /s/ Asim H. Modi

ASIM H. MODI

15 Special Assistant United States Attorney

16 Attorneys for Defendant

17 ORDER

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

22 Dated: February 29, 2016

23 

24 CAROLYN K. DELANEY

25 UNITED STATES MAGISTRATE JUDGE  
26  
27  
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