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9 Attorneys for Defendant

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

12	CHERISH FAWN ORTIZ,)	Case No.: 2:15-CV-01456-AC
13)	
14	Plaintiff,)	STIPULATION AND PROPOSED ORDER
15	vs.)	FOR EXTENSION OF TIME FOR
16	CAROLYN W. COLVIN,)	DEFENDANT TO FILE OPPOSITION TO
17	Acting Commissioner of Social Security,)	PLAINTIFF'S MOTION FOR SUMMARY
18	Defendant.)	JUDGMENT
19)	

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21 IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record,
 22 that the time for responding to Plaintiff's Motion for Summary Judgment be extended from
 23 December 30, 2015, to February 1, 2016. This is Defendant's first request for extension.
 24 Defendant respectfully requests additional time following recent reassignment of the case in
 25 order to adequately research and analyze the issues presented by Plaintiff. Defendant makes this
 26 request in good faith with no intention to unduly delay the proceedings.

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1 The parties further stipulate that the Court's Scheduling Order shall be modified
2 accordingly.

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4 Respectfully submitted,

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6 Dated: December 10, 2015

/s/ *John v. Johnson
(*as authorized by email on December 5, 2015)
JOHN V. JOHNSON
Attorney for Plaintiff

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8
9 Dated: December 10, 2015


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13 By: /s/ Roya Massoumi
14 ROYA MASSOUMI
15 Special Assistant U.S. Attorney
16 Attorneys for Defendant

17 **ORDER**

18 APPROVED AND SO ORDERED:

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20 DATED: December 14, 2015

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22 ALLISON CLAIRE
23 UNITED STATES MAGISTRATE JUDGE
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