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

LYNN EILEEN GNIBUS,	)	Case No.: 2:15-CV-01669-AC
	)	
Plaintiff,	)	STIPULATION AND ORDER FOR AN
	)	EXTENSION OF TIME
vs.	)	
CAROLYN W. COLVIN,	)	
Acting Commissioner of Social Security,	)	
	)	
Defendant.	)	

IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that Defendant shall have an extension of time to April 20, 2016 to respond to Plaintiff's opening brief. The current due date is March 21, 2016. This is Defendant's first request for an extension. Defendant respectfully requests this additional time due to a heavy workload. Defendant's counsel is currently working on a motion in the Ninth Circuit. In addition, Defendant's counsel is responsible for managing and briefing forty-four other matters pending before the District Courts.

This request is made in good faith with no intention to unduly delay the proceedings.

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

Counsel apologizes to the Court for any inconvenience caused by this delay.

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Respectfully submitted,  
LAW OFFICES OF LAWRENCE D. ROHLFING

Dated: March 21, 2016

/s/ Vijay J. Patel by Chantal R. Jenkins\*  
Vijay J. Patel  
As authorized via email on March 21, 2016  
Attorney for Plaintiff

Dated: March 21, 2016


BENJAMIN B. WAGNER  
United States Attorney  
DEBORAH LEE STACHEL  
Acting Regional Chief Counsel, Region IX  
Social Security Administration

By: /s/ Chantal R. Jenkins  
CHANTAL R. JENKINS  
Special Assistant United States Attorney

ORDER

APPROVED AND SO ORDERED.

DATED: March 23, 2016

  
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ALLISON CLAIRE  
UNITED STATES MAGISTRATE JUDGE