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Attorneys for Defendant

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UNITED STATES DISTRICT COURT EASTERN DISTRICT OF CALIFORNIA SACRAMENTO DIVISION

LYNN EILEEN GNIBUS,

Plaintiff,

Vs.

CAROLYN W. COLVIN,
Acting Commissioner of Social Security,

Defendant.

Case No.: 2:15-CV-01669-AC

STIPULATION AND PROPOSED ORDER
FOR A SECOND EXTENSION OF TIME

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 May 4, 2016 to respond to Plaintiff's opening brief. The current due date is April 20, 2016. Defendant respectfully requests this additional time due to a heavy workload. Defendant's counsel just argued before the Ninth Circuit and is currently working on a motion in another matter before the Ninth Circuit. In addition, Defendant's counsel is responsible for managing and briefing forty-eight other matters pending before the District Courts.

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

1	The parties further stipulate that the Court's Scheduling Order shall be modified		
2	accordingly.		
3	Counsel apologizes to the Court for any inconvenience caused by this delay.		
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5			Respectfully submitted,
6			LAW OFFICES OF LAWRENCE D. ROHLFING
7	Dated: April 19, 2016		/s/ Vijay J. Patel by Chantal R. Jenkins*
8			Vijay J. Patel As authorized <i>via</i> email on April 19, 2016
9			Attorney for Plaintiff
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11	Dated: April 19, 2016		BENJAMIN B. WAGNER United States Attorney
12			DEBORAH LEE STACHEL
13			Acting Regional Chief Counsel, Region IX Social Security Administration
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15		By:	/s/ Chantal R. Jenkins
16			CHANTAL R. JENKINS Special Assistant United States Attorney
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18			<u>ORDER</u>
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20	APPROVED AND SO ORDERED:		
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22	Dated: April 27, 2016		1/
23			allison Claire
24			UNITED STATES MAGISTRATE JUDGE
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