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

13 RIGOBERTO GALVAN ALCAZAR,)	Case No.: 2:15-cv-02203-KJN
14 Plaintiff,)	
15 vs.)	ORDER APPROVING STIPULATION FOR
16 CAROLYN W. COLVIN,)	AN EXTENSION OF TIME OF 45 DAYS
Acting Commissioner of Social Security,)	FOR DEFENDANT'S RESPONSE TO
17 Defendant.)	PLAINTIFF'S MOTION FOR SUMMARY
)	JUDGMENT
)	
)	

19 IT IS HEREBY STIPULATED, by and between the parties, through their respective
20 counsel of record, that Defendant shall have an extension of time of an additional 45 days to
21 respond to Plaintiff's motion for summary judgment. This is the first continuance sought by
22 Defendant. The current due date is November 2, 2016. The new due date will be December 19,
23 2016.

24 There is good cause for this request. Defendant is seeking this extension due to an
25 emergency and workload issues. Defendant's counsel had a medical emergency on Monday,
26 October 24, 2016, and had and will continue to take some leave.

1 Defendant is requesting additional time up to and including December 19, 2016, to fully
2 review the record and research the issues presented by Plaintiff's motion for summary judgment.
3 This request is made in good faith with no intention to unduly delay the proceedings.

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

6 Respectfully submitted,

7 Date: October 26, 2016

CERNEY KREUZE & LOTT, LLP

8 s/ Shellie Lott by C.Chen*

9 (As authorized by e-mail on 10/26/2016)

10 SHELLIE LOTT

Attorneys for Plaintiff

11 Date: October 26, 2016

PHILLIP A. TALBERT

12 Acting United States Attorney

13 By s/ Carolyn B. Chen

14 CAROLYN B. CHEN


15 Special Assistant U. S. Attorney

16 Attorneys for Defendant

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18 ORDER

19 APPROVED AND SO ORDERED.

20 Dated: October 27, 2016

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23 _____
KENDALL J. NEWMAN
24 UNITED STATES MAGISTRATE JUDGE
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