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

14 SERISSE MICHELLE PERRY,) Civil No. 2:15-cv-02482-CKD
15 Plaintiff,)
16 v.) **UNOPPOSED MOTION FOR A SECOND**
17) **EXTENSION OF TIME FOR**
18 CAROLYN W. COLVIN,) **DEFENDANT TO FILE HER MOTION**
Acting Commissioner of Social Security,) **FOR SUMMARY JUDGMENT**
19 Defendant.)
20)

21 Defendant respectfully motions this Court for a second extension of time of 16 days to
22 file her motion for summary judgment, or until Friday, July 1, 2016. Upon review of Plaintiff's
23 MSJ, Defendant requests this additional time for the opportunity to consider the possibility of
24 voluntary remand in lieu of further litigation. In addition, Defendant respectfully requests this
25 extension because of a heavy accumulated workload as a result of a two week absence from the
26 office. The undersigned spoke with Plaintiff's counsel by telephone on June 28, 2016, and was
27 informed that this motion is not opposed.

28 Stip. to Extend Def.'s MSJ

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The new due date for Defendant’s motion for summary judgment will be Friday, July 1, 2016.

Respectfully submitted,

Date: June 28, 2016

BENJAMIN B. WAGNER
United States Attorney

By: /s/ Jeffrey Chen
JEFFREY CHEN
Special Assistant United States Attorney
Attorneys for Defendant

ORDER

APPROVED AND SO ORDERED:

Dated: June 30, 2016

Carolyn K. Delaney
CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE

Stip. to Extend Def.’s MSJ