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8 Attorney for Plaintiff

9 UNITED STATES DISTRICT COURT
10 EASTERN DISTRICT OF CALIFORNIA

11 DERRICK NOBLES,)

12 Plaintiff)

13 v.)

14 CAROLYN W. COLVIN,)
15 Acting Comm'r of Social Security,)

16 Defendant)
17)
18)

Case No. 2:15-cv-02525-CKD

**STIPULATION AND PROPOSED
ORDER FOR EXTENSION OF TIME
TO FILE PLAINTIFF'S MOTION
FOR SUMMARY JUDGMENT**

19 IT IS HEREBY STIPULATED by the parties, through their undersigned attorneys, to extend
20 the time 45 days to July 7, 2016, for Plaintiff to file his Motion for Summary Judgment, in
21 accordance with the Court's Scheduling Order. This is Plaintiff's first request for an extension for
22 filing of the Opening Brief, which is requested because of Plaintiff's counsel's recent poor health and
23 family reasons, which have caused a backlog in her workload.
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1 The parties further stipulate that the Court's Scheduling Order be modified
2 accordingly.

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4 Respectfully submitted,

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7 Date: May 19, 2016

JACQUELINE A. FORSLUND
Attorney at Law

8
9 /s/Jacqueline A. Forslund
10 JACQUELINE A. FORSLUND

11 Attorney for Plaintiff

12
13 Date: May 20, 2016

PHILLIP A. TALBERT
Acting United States Attorney
DEBORAH STACHEL
Acting Regional Chief Counsel, Region IX
Social Security Administration

17 /s/Asim Modi
18 ASIM MODI
19 Special Assistant United States Attorney
*By email authorization

20 Attorney for Defendant

21
22 ORDER

23 APPROVED AND SO ORDERED

24 Dated: May 24, 2016

25 
26 CAROLYN K. DELANEY
27 UNITED STATES MAGISTRATE JUDGE
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