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

14 EDWARD ERIN FREDERICKS,)	Civil No. 2:15-cv-02548-EFB
)	
15 Plaintiff,)	STIPULATION AND PROPOSED ORDER
)	FOR A FIRST EXTENSION OF TIME
16 v.)	FOR DEFENDANT TO FILE HER
)	MOTION FOR SUMMARY JUDGMENT
17 CAROLYN W. COLVIN,)	
18 Acting Commissioner of Social Security,)	
)	
19 Defendant.)	
20)	

21 IT IS HEREBY STIPULATED by the parties, through their undersigned attorneys, and
 22 with the approval of the Court, that Defendant shall have a first extension of time of 45 days to
 23 file her motion for summary judgment. Defendant respectfully requests this additional time
 24 because of a heavy accumulated workload following a two week absence from the office in
 25 Taiwan as a result of the passing of his grandfather.

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 28 Stip. to Extend Def.'s Brief

1 The new due date for Defendant's motion for summary judgment will be Monday, July
2 25, 2016.

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Respectfully submitted,

Date: June 29, 2016

BRIAN SHAPIRO

By: /s/ Brian Shapiro*
BRIAN SHAPIRO
* By email authorization on June 29, 2016
Attorney for Plaintiff

Date: June 29, 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: July 1, 2016.



HONORABLE EDMUND F. BRENNAN
UNITED STATES MAGISTRATE JUDGE

Stip. to Extend Def.'s Brief