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5 Attorney for Plaintiff,
TIMOTHY L. BEALS

7 IN THE UNITED STATES DISTRICT COURT
8 EASTERN DISTRICT OF CALIFORNIA

9 TIMOTHY L. BEALS,
10 Plaintiff,
11 v.
12 CAROLYN W. COLVIN,
Commissioner of Social Security,
13 Defendant.
14

Case No.: 2:16-cv-00008-CKD

JOINT STIPULATION AND ~~PROPOSED~~
ORDER TO AMEND SCHEDULING
ORDER

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16 Plaintiff Timothy L. Beals and defendant Commissioner of Social Security, through their
17 counsels of record, jointly request to amend the Court's Scheduling Order in this action as follows.

18 IT IS STIPULATED, that the time for Plaintiff to file his Motion for Summary
19 Judgment/Remand be extended fourteen (14) days until September 1, 2016. This will be the final
20 extension of time Plaintiff may request. Plaintiff's counsel needs additional time to prepare
21 Plaintiff's opening brief due to conflicts arising from counsel's current workload, which is
22 complicated based on counsel's current position as a solo practitioner without another attorney to
23 delegate tasks to, as well as the length of the administrative record in this matter which exceeds 1700
24 pages. Counsel regrets making this second request and apologizes to the Court and the parties for
25 any inconvenience.

26 It is further stipulated that Defendant's deadline to respond to Plaintiff's Motion for
27 Summary Judgment be extended through October 17, 2016. Defendant's counsel will require this
28 requested extension due to pre-existing court deadlines in other matters which conflict with the new

1 briefing schedule Plaintiff requests.

2
3 Dated: August 16, 2016

Respectfully submitted,

4 /s/ Jared T. Walker

Jared T. Walker,
Attorney for Plaintiff

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6 SO STIPULATED:

7 PHILLIP A. TALBERT
United States Attorney

8
9 Dated: August 16, 2016

By: /s/ Ellinor R. Coder*
(*authorized by e-mail on 8/16/2016)
Ellinor R. Coder
Special Assistant United States Attorney
Attorneys for Defendant

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13 ORDER

14 Based on the stipulation of the parties, it is ORDERED, that the deadline for Plaintiff to file
15 his motion for summary judgment in this action is extended through September 1, 2016. No
16 additional extensions of time will be granted to Plaintiff. It is further ORDERED that Defendant's
17 deadline to respond to Plaintiff's motion for summary judgment is extended through October 17,
18 2016. All other aspects of the Scheduling Order previously issued in this action remain unchanged.

19
20 Dated: August 18, 2016

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