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8 Attorney for Plaintiff

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

12 BRUNILDA A. LARA,  
 13 Plaintiff,  
 14 v.  
 15 Commissioner of Social Security,  
 16 Defendant

Case No: 2:16-cv-00034-AC

STIPULATION AND ORDER FOR  
 EXTENSION OF TIME  
 [Fed.R.Civ.P. 6]

17 Plaintiff requests an extension of thirty (30) days for all deadlines in this case for  
 18 Plaintiff's counsel to draft and file a motion for summary judgment.

19 The parties request this extension in good faith, with no intent to prolong  
 20 proceedings unduly.

21 Defendant does not object to allowing Plaintiff the additional time to draft her  
 22 motion for summary judgment and, subject to the Court's approval, stipulates to thirty  
 23 (30) days extension of time to allow Plaintiff to file her motion for summary judgment in  
 24 this action. Plaintiff's motion for summary judgment or remand is now due on August  
 25 14, 2016. This is Plaintiff's first request for additional time.

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 28 SO STIPULATED AND AGREED:

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For Plaintiff:  
WEEMS LAW OFFICES

For Defendant:  
BENJAMIN B. WAGNER  
United States Attorney  
DEBORAH LEE STACHEL  
Acting Regional Chief Counsel,  
Region IX  
Social Security Administration

/s/Robert C. Weems  
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Robert C. Weems, Attorney for  
Plaintiff

By: /s/ Heather M. Moss  
\_\_\_\_\_  
Heather M. Moss  
Special Assistant United States  
Attorney and Attorney for the  
Defendant (per e-mail authorization)

SO ORDERED:  
  
DATE: July 20, 2016

  
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ALLISON CLAIRE  
MAGISTRATE JUDGE OF THE  
UNITED STATES DISTRICT COURT