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9 Attorneys for Defendant

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

13 LOURA LEE MANN,	)	Case No. 2:16-cv-00421-AC
14 Plaintiff,	)	STIPULATION AND <del>PROPOSED</del> ORDER
15 v.	)	FOR AN EXTENSION OF TIME
16 CAROLYN W. COLVIN,	)	
17 Acting Commissioner of Social Security,	)	
18 Defendant.	)	
19	)	

20 IT IS HEREBY STIPULATED, by and between the parties, through their respective  
 21 counsel of record, that the time for responding to Plaintiff’s Motion for Summary Judgment  
 22 (Doc. 14) be extended from November 21, 2016, to December 21, 2016. This is Defendant’s  
 23 first request for an extension of time to respond to Plaintiff’s motion. Defendant respectfully  
 24 requests this additional time because Defendant’s counsel has four Federal court pleadings to  
 25 prepare before November 21, 2016, and a post-hearing brief in a Merit Systems Protection Board  
 26 original jurisdiction case which is due on November 25, 2016, the Friday of the Thanksgiving  
 27 holiday week.  
 28

Stip. & Prop. Order for Ext.; 2:16-cv00421-AC

1 The parties further stipulate that the Court's Scheduling Order shall be modified  
2 accordingly.

3 Counsel apologizes to the Court for any inconvenience caused by this delay.

4  
5 Respectfully submitted,

6 Dated: October 27, 2016

/s/ Robert Weems\*

(\*as authorized via email on 10/27/16)

7 ROBERT WEEMS

8 Attorney for Plaintiff

9 BENJAMIN B. WAGNER

10 United States Attorney

11 DEBORAH LEE STACHEL

12 Regional Chief Counsel, Region IX

Social Security Administration

13 Dated: October 27, 2016

By: /s/ Cynthia B. De Nardi

14 CYNTHIA B. DE NARDI

15 Special Assistant United States Attorney

16 Attorneys for Defendant

17  
18  
19  
20 ORDER

21 APPROVED AND SO ORDERED:

22 Dated: October 31, 2016

23 

24 ALLISON CLAIRE

25 UNITED STATES MAGISTRATE JUDGE