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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

FAITH MARIE ANAYA ROSALES,) Civil No. 2:16-cv-00761-CMK
)
Plaintiff,) **STIPULATION AND ORDER FOR A**
) **FOURTH EXTENSION OF TIME FOR**
v.) **DEFENDANT TO FILE HER MOTION**
) **FOR SUMMARY JUDGMENT**
NANCY A. BERRYHILL,)
Acting Commissioner of Social Security,)
)
Defendant.)
)

IT IS HEREBY STIPULATED by the parties, through their undersigned attorneys, and with the approval of the Court, that Defendant shall have a fourth extension of time of 30 days to file her Motion for Summary Judgment. Defendant apologizes for missing the filing deadline in this case and respectfully requests this additional time. Defendant’s counsel is seeking this extension due to a recent change of counsel (from Jeffery Chen to Mr. Chen’s direct supervisor Jacob Mikow, the undersigned), management re-assessing heavy workloads, and the expectation that a new counsel for Defendant will be assigned to this case in the near future.

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The new due date for Defendant's Motion for Summary Judgment will be Monday, April 24, 2017.

Date: April 19, 2017

Respectfully submitted,
FORSLUND LAW LLC

By: /s/ Jacqueline Anna Forslund *
JACQUELINE ANNA FORSLUND
* By email authorization on April 15, 2017
Attorney for Plaintiff

Date: April 19, 2017

PHILIP A. TALBERT
United States Attorney

By: /s/ Jacob M. Mikow
JACOB M. MIKOW
Special Assistant United States Attorney
Attorneys for Defendant

ORDER

APPROVED AND SO ORDERED:

Dated: April 26, 2017


CRAIG M. KELLISON
UNITED STATES MAGISTRATE JUDGE

Stip. to Extend Def.'s MSJ