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

14 GALINA DEMCHUK,	)	Civil No. 2:16-cv-00977-EFB
	)	
15 Plaintiff,	)	<b>STIPULATION AND PROPOSED ORDER</b>
	)	<b>FOR A FIRST EXTENSION OF TIME</b>
16 v.	)	<b>FOR DEFENDANT TO FILE HER MSJ</b>
	)	
17 NANCY A. BERRYHILL,	)	
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 30 days  
 23 from today to file her MSJ. Defendant apologizes for improperly calendaring this case and  
 24 respectfully requests this additional time because he has a very heavy workload, and because of  
 25 an upcoming family vacation to Taiwan that will result in an absence from the office from  
 26 Monday, February 27 through Friday, March 17, 2017.

28 Stip. to Extend Def.'s MSJ

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The new due date for Defendant's MSJ will be Wednesday, March 26, 2017.

Respectfully submitted,

Date: February 27, 2017

LAW OFFICES OF JESSE S. KAPLAN

By: /s/ Jesse Kaplan\*  
JESSE KAPLAN  
\* By email authorization on Feb. 27, 2017  
Attorney for Plaintiff

Date: February 27, 2017

PHILIP A. TALBERT  
United States Attorney

By: /s/ Jeffrey Chen  
JEFFREY CHEN  
Special Assistant United States Attorney  
Attorneys for Defendant

ORDER

APPROVED AND SO ORDERED.

DATED: February 27, 2017.

  
EDMUND F. BRENNAN  
UNITED STATES MAGISTRATE JUDGE

Stip. to Extend Def.'s MSJ