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8 Attorneys for Plaintiff  
9 JOSETTE JEANEEN TORREZ

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**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

JOSETTE JEANEEN TORREZ	)	Case No.: 2:16-cv-01078-KJN
Plaintiff,	)	
v.	)	STIPULATION TO EXTEND TIME TO FILE MOTION FOR SUMMARY JUDGMENT AND/OR REMAND
CAROLYN W. COLVIN, Acting Commissioner of Social Security.	)	
Defendant.	)	(FIRST REQUEST)
	)	
	)	

Plaintiff Josette Jeaneen Torrez and Defendant Carolyn W. Colvin, Acting Commissioner of Social Security, through their undersigned attorneys, stipulate, subject to this court's approval, to extend the time by 14 days from October 21, 2016 to November 4, 2016 for Plaintiff to file a motion for summary judgment and/or remand, with all other dates in the Court's Order Concerning Review Of Social Security Cases extended accordingly. Specifically, Defendant's opposition shall be due on or before December 5, 2016. Plaintiff's reply, if any, shall be due on or before December 26, 2016. This is Plaintiff's first request for an extension.

1 This request is made at the request of Plaintiff's counsel who has been scheduled  
2 to appear in an out-of-state hearing on short notice (waiving 20 days written  
3 notice) due to unforeseen circumstances which occurred in another matter.  
4 Counsel will be traveling and requests additional time to fully research the issues  
5 presented. Counsel sincerely apologizes to the Court, its staff, and all parties  
6 involved for any inconvenience this may have caused.

7  
8 DATE: October 18, 2016

Respectfully submitted,

LAWRENCE D. ROHLFING

*/s/ Cyrus Safa*

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10 BY: \_\_\_\_\_  
11 Cyrus Safa

12 Attorney for plaintiff Josette Jeaneen Torrez

13 DATE: October 18, 2016

14 PHILLIP A. TALBET

*United States Attorney*

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16 DEBORAH LEE STACHEL

*Regional Chief Counsel*


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18 */s/ Jeffrey T. Chen*

19 BY: \_\_\_\_\_  
20 Jeffrey T. Chen

21 Special Assistant United States Attorney  
22 Attorneys for defendant Carolyn W. Colvin  
23 |\*authorized by e-mail|

24 IT IS SO ORDERED. \_\_\_\_\_

25 Dated: October 20, 2016

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KENDALL J. NEWMAN  
UNITED STATES MAGISTRATE JUDGE