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

14	JOSETTE JEANEEN TORREZ,)	No. 2:16-cv-01078-KJN
)	
15	Plaintiff,)	STIPULATION AND PROPOSED ORDER
)	FOR A FIRST EXTENSION OF TIME
16	v.)	FOR DEFENDANT TO FILE HER
)	MOTION FOR SUMMARY JUDGMENT
17	CAROLYN W. COLVIN,)	
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 45 days to
 23 file her motion for summary judgment. Defendant respectfully requests this additional time
 24 because he has a very heavy workload, including an upcoming Ninth Circuit merits brief due on
 25 December 21. In addition, the undersigned has a pre-planned holiday of two week at the end of
 26 December and in early January.

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 28 Stip. to Extend Def.'s MSJ

1 The new due date for Defendant's responsive brief and opposition to Plaintiff's brief will
2 be Thursday, January 19, 2017.

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4 Respectfully submitted,

5 Date: December 16, 2016

LAW OFFICES OF LAWRENCE D. ROHLFING

6 By: /s/ Cyrus Safa*

CYRUS SAFA

* By email authorization on Dec. 16, 2016

7 Attorney for Plaintiff

8
9 Date: December 16, 2016

PHILIP A. TALBERT

United States Attorney

10
11 By: /s/ Jeffrey Chen

JEFFREY CHEN

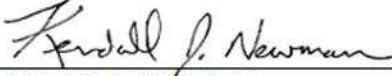
Special Assistant United States Attorney

12 Attorneys for Defendant

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17 ORDER

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19 APPROVED AND SO ORDERED:

20 Dated: December 20, 2016

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23 
24 KENDALL J. NEWMAN
25 UNITED STATES MAGISTRATE JUDGE
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