| 1 | PHILIP A. TALBERT | | |
|----|---|--|--|
| 2 | United States Attorney DEBORAH LEE STACHEL | | |
| 3 | Regional Chief Counsel, Region IX | | |
| 4 | Social Security Administration JEFFREY CHEN, CSBN 260516 | | |
| 5 | Special Assistant United States Attorney | | |
| 6 | Social Security Administration 160 Spear Street, Suite 800 | | |
| 7 | San Francisco, CA 94105 Telephone: (415) 977-8939 | | |
| 8 | Facsimile: (415) 744-0134 | | |
| 9 | Email: Jeffrey.Chen@ssa.gov Attorneys for Defendant | | |
| 10 | | | |
| | UNITED STATES DISTRICT COURT | | |
| 11 | EASTERN DISTRICT OF CALIFORNIA | | |
| 12 | SACRAMENTO DIVISION | | |
| 13 | KAREN MARLENE PARIS, | Civil No. 2:16-cv-01381-EFB | |
| 14 |) | | |
| 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, | WOTION FOR SOWWART JUDGMENT | |
| 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 to | | |
| 23 | file her motion for summary judgment. Defendant respectfully requests this additional time | | |
| 24 | because of a very heavy workload and because of a two week preplanned vacation for the | | |
| 25 | holidays ending Friday, January 6, 2017. | | |
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| 28 | Stip. to Extend Def.'s MSJ | | |
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| 1 | The new due date for Defendant's motion for summary judgment will be Friday, January | | |
|----|--|---------|---|
| 2 | 20, 2017. | ant s m | ionon for summary judgment will be i fiday, sandary |
| 2 | 20, 2017. | | |
| 4 | | | Respectfully submitted, |
| 5 | Date: January 5, 2017 | | LAW OFFICE OF LAWRENCE D. ROHLFING |
| 6 | | By: | /s/ Lawrence Rohlfing* |
| 7 | | | LAWRENCE ROHLFING * By email authorization on Jan. 4, 2017 |
| 8 | | | Attorney for Plaintiff |
| 9 | Date: January 5, 2017 | | PHILIP A. TALBERT United States Attorney |
| 10 | | - | |
| 11 | | By: | <u>/s/ Jeffrey Chen</u> JEFFREY CHEN |
| 12 | | | Special Assistant United States Attorney Attorneys for Defendant |
| 13 | | | Auomeys for Defendant |
| 14 | | | |
| 15 | | | |
| 16 | | | |
| 17 | | | <u>ORDER</u> |
| 18 | | | |
| 19 | APPROVED AND SO ORDERED. | Ģ | Emin F. Bierna |
| 20 | DATED: January 17, 2017. | 10 | HONORABLE EDMUND F. BRENNAN |
| 21 | | | UNITED STATES MAGISTRATE JUDGE |
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| 28 | Stip. to Extend Def.'s MSJ | | |
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