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

14 LEWIS S. CANE,) Civil No. 2:16-cv-01699-KJN
15 Plaintiff,)
16 v.) **STIPULATION AND PROPOSED ORDER**
17) **FOR A FIRST EXTENSION OF TIME**
18 NANCY A. BERRYHILL,) **FOR DEFENDANT TO FILE HER MSJ**
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 MSJ. Defendant respectfully requests this additional time because he has a very heavy
24 workload, and because of an upcoming family vacation to Taiwan that will result in an absence
25 from the office from Monday, February 27 through Friday, March 17, 2017.

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28 Stip. to Extend Def.'s MSJ

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The new due date for Defendant’s MSJ will be Wednesday, April 12, 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: March 2, 2017



KENDALL J. NEWMAN
UNITED STATES MAGISTRATE JUDGE