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9 Attorneys for Defendant

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

14	KATHERINE A. ARELLANO KEHM,)	Civil No. 2:16-cv-01918-AC
)	
15	Plaintiff,)	STIPULATION AND PROPOSED ORDER
)	FOR A FIRST EXTENSION OF TIME
16	v.)	FOR DEFENDANT TO FILE HER MSJ
)	
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 to
 23 file her motion for summary judgment. Defendant respectfully requests this additional time
 24 because of a very heavy workload, and in order to further consider the issues raised in Plaintiff's
 25 MSJ for the possibility of voluntary remand.

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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 Friday, September 8, 2017.

Respectfully submitted,

Date: August 9, 2017

WEEMS LAW OFFICES

By: /s/ Robert Weems*

ROBERT WEEMS

** By email authorization on August 8, 2017*

Attorney for Plaintiff

Date: August 9, 2017

PHILLIP A. TALBERT

United States Attorney

By: /s/ Michael K. Marriott

MICHAEL K. MARRIOTT

Special Assistant United States Attorney

Attorneys for Defendant

Of Counsel
Jeffrey Chen
Assistant Regional Counsel
Social Security Administration

ORDER

APPROVED AND SO ORDERED:



DATED: August 10, 2017

HONORABLE ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE

Stip. to Extend Def.'s MSJ