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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 SECOND 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 second extension of time of 14 days
 23 to file her motion for summary judgment. Defendant respectfully requests this additional time
 24 because the parties are still considering the issues Plaintiff raised and the certified administrative
 25 record for the possibility of voluntary remand in lieu of further litigation.

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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 22, 2017.

Respectfully submitted,

Date: September 8, 2017

WEEMS LAW OFFICES

By: /s/ Robert Weems*

ROBERT WEEMS

** By email authorization on September 7, 2017*

Attorney for Plaintiff

Date: September 8, 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: September 8, 2017


ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE

Stip. to Extend Def.'s MSJ