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

14	DERICK LLOYD FREEMAN,)	Civil No. 2:16-cv-01988-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 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 19, 2017.

Respectfully submitted,

Date: February 27, 2017

FORSLUND LAW LLC

By: /s/ Jacqueline Forslund*

JACQUELINE FORSLUND

** 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: February 27, 2017



ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE

Stip. to Extend Def.'s MSJ