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 8 Attorneys for Defendant

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

13	DERICK LLOYD FREEMAN,	)	Civil No. 2:16-cv-01988-AC
		)	
14	Plaintiff,	)	<b>STIPULATION AND PROPOSED ORDER</b>
		)	<b>FOR A SECOND EXTENSION OF TIME</b>
15	v.	)	<b>FOR DEFENDANT TO FILE HER MSJ</b>
		)	
16	NANCY A. BERRYHILL,	)	
17	Acting Commissioner of Social Security,	)	
		)	
18	Defendant.	)	
19		)	

20 IT IS HEREBY STIPULATED by the parties, through their undersigned attorneys, and  
 21 with the approval of the Court, that Defendant shall have a second extension of time of 30 days  
 22 to file her MSJ. Defendant respectfully requests this additional time because he has a very heavy  
 23 workload, including four District Court briefs as well as a Ninth Circuit merits brief that requires  
 24 significant time to complete within the next two weeks.

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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, May 19, 2017.

Respectfully submitted,

Date: May 2, 2017

FORSLUND LAW LLC

By: /s/ Jacqueline Forslund\*  
JACQUELINE FORSLUND  
\* By email authorization on May 2, 2017  
Attorney for Plaintiff

Date: May 2, 2017

PHILIP A. TALBERT  
United States Attorney

By: /s/ Michael K. Marriott  
MICHAEL K. MARRIOTT  
Special Assistant United States Attorney  
Attorneys for Defendant

ORDER

APPROVED AND SO ORDERED:

DATED: May 3, 2017

Allison Claire  
ALLISON CLAIRE  
UNITED STATES MAGISTRATE JUDGE

Stip. to Extend Def.'s MSJ