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 8 Attorneys for Plaintiff
 9 JUAN FRANCISCO MENDOZA MENDEZ

10 **UNITED STATES DISTRICT COURT**
 11 **EASTERN DISTRICT OF CALIFORNIA**

12	JUAN FRANCISCO MENDOZA)	Case No.: 2:17-cv-00332-AC
13	MENDEZ)	
14	Plaintiff,)	STIPULATION TO EXTEND TIME
15	v.)	TO FILE MOTION FOR SUMMARY
16	NANCY A. BERRYHILL, Acting)	JUDGMENT
17	Commissioner of Social Security.)	(FIRST REQUEST)
18	Defendant.)	

19 Plaintiff Juan Francisco Mendoza Mendez and Defendant Carolyn W.
 20 Colvin, Acting Commissioner of Social Security, through their undersigned
 21 attorneys, stipulate, subject to this court’s approval, to extend the time by 30 days
 22 from August 21, 2017 to September 21, 2017 for Plaintiff to file a Motion for
 23 Summary Judgment, with all other dates in the Court’s Order Concerning Review
 24 Of Social Security Cases extended accordingly. This is Plaintiff’s second and last
 25 request for an extension. This request is made at the request of Plaintiff’s counsel
 26 to allow additional time to fully research the issues presented. Counsel has had

1 back to back hearings and had to cancel a family vacation just to address three
2 motions that could wait no longer. Counsel currently has 13 overdue motions as of
3 today and is doing all she can do complete and file as many as possible. Counsel's
4 hearing schedule is significantly lighter for September and counsel will get these
5 and the 11 that are due in the month of September currently. Counsel requests this
6 extension in good faith.

7 DATE: August 25, 2017

Respectfully submitted,

LAWRENCE D. ROHLFING

/s/ Denise Bourgeois Haley

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10 BY: _____

Denise Bourgeois Haley

Attorney for plaintiff

Juan Francisco Mendoza Mendez

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13 DATE: August 25, 2017

PHILLIP A. TALBET

United States Attorney

DEBORAH LEE STACHEL

Regional Chief Counsel

Social Security Administration

/s/ Donna W. Anderson

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18 BY: _____

Donna W. Anderson

Special Assistant United States Attorney

Attorneys for defendant Nancy A. Berryhill

|*authorized by e-mail|

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22 DATED: August 29, 2017

23 IT IS SO ORDERED: _____

Allison Clane
UNITED STATES MAGISTRATE JUDGE

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