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

13 BENJAMIN ENRIQUEZ PEREZ,) Civil No. 2:17-cv-00624-CKD
14)
Plaintiff,) **STIPULATION AND ORDER FOR A**
15) **FIRST EXTENSION OF TIME FOR**
16 v.) **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.

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The new due date for Defendant's MSJ will be Wednesday, October 25, 2017.

Respectfully submitted,

Date: September 25, 2017

CERNEY KREUZE & LOTT, LLP

By: /s/ Shellie Lott*

SHELLIE LOTT

* By email authorization on September 25, 2017
Attorney for Plaintiff

Date: September 25, 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 26, 2017

CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE