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8 Attorney for MICHELLE TANYA MARONEY

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

12	TASHAYHA M. GILMER,)	Civil Number 2:17-CV-0845-CMK
)	
13)	
	Plaintiff,)	JOINT STIPULATION AND
14	vs.)	ORDER FOR
)	EXTENSION OF TIME
15)	
16)	
	COMMISSIONER OF)	
17	SOCIAL SECURITY)	
18)	
	Defendant.)	
19)	
20)	

21 **Plaintiff, Michelle Tanya Maroney, deceased, acting through her substituted**
 22 **plaintiff, Tashayha M. Gilmer, daughter of plaintiff Michelle Tanya Maroney, respectfully**
 23 **request that the Court extend the time for Plaintiff to file the motion for summary**
 24 **judgment originally due on or about December 22, 2017, by 90 days from the date of this**
 25 **stipulation, through and including June 8, 2018. This is the plaintiff’s first request for an**
 26 **extension of time. The extension of time is necessary for plaintiff’s counsel to prepare the**
 27 **motion for summary of judgment. This extension is made with no intention to unduly**
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1 delay this proceeding. Plaintiff conferred with defendant's counsel who had no objection to
2 this request. A declaration by Plaintiff's counsel is being submitted herewith.

3 Respectfully Submitted,
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6 Dated: March 13, 2018

Richard A. Whitaker, Plaintiff's Attorney

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8 Dated: March 13, 2018

Philip A. Talbert
United States Attorney

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12 By /S/ Sharon Lahey
13 Sharon Lahey
14 Special Assistant U.S. Attorney

15 **ORDER**

16
17 **IT IS SO ORDERED.**

18
19 Dated: March 19, 2018

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21 **CRAIG M. KELLISON**
22 **UNITED STATES MAGISTRATE JUDGE**