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5 Attorney for Plaintiff,
 6 KHATARI COLEMAN

7
 8 UNITED STATES DISTRICT COURT
 9 EASTERN DISTRICT OF CALIFORNIA

10 KHATARI COLEMAN,)	Case No. 2:17-CV-01069-EFB
11 Plaintiff,)	
12 vs.)	STIPULATION AND PROPOSED ORDER
13 NANCY A. BERRYHILL, Acting)	FOR AN EXTENSION OF TIME FOR
14 Commissioner of the Social Security)	PLAINTIFF TO FILE MOTION FOR
15 Administration,)	SUMMARY JUDGMENT
16 Defendant.)	

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 18 IT IS HEREBY STIPULATED, by and between the parties, through their respective
 19 counsel of record, that Plaintiff shall have an extension of time of 60 days to file his Motion
 20 for Summary Judgment in response to Defendant’s Answer. The current due date for filing
 21 Plaintiff’s Motion for Summary Judgment is November 24, 2017. The new due date will be
 22 January 23, 2018.

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 24 This extension is requested because the undersigned substituted in as Plaintiff’s
 25 Attorney on November 14, 2017, needs more time to adequately prepare and research
 26 Plaintiff’s Motion for Summary Judgment (MSJ), has a substantial caseload, including
 27 representation of claimants in nine Social Security administrative hearing cases scheduled
 28

STIPULATION TO EXTENSION OF TIME FOR PLAINTIFF TO FILE MOTION FOR
 SUMMARY JUDGMENT, AND ~~PROPOSED~~ ORDER; CASE NO. 2:17-CV-01069-EFB

1 between now and January 18, 2018, and administrative duties as an office project
2 coordinator. Plaintiff sincerely apologizes to the Court and to Defendant for any
3 inconvenience caused by this delay. The parties further stipulate that the Court's Scheduling
4 Order shall be modified accordingly.

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6 Respectfully submitted,

7 Dated: 11/14/17

/s/Donald H. Medearis
Attorney for
KHATARI COLEMAN
Plaintiff

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10
11 Dated: 11/14/17

PHILLIP A. TALBERT
United States Attorney
DEBORAH LEE STACHEL,
Regional Chief Counsel, Region IX
Social Security Administration

By: /s/Asim H. Modi *
(* as authorized by e-mail on 11/14/17)
ASIM H. MODI
Special Assistant U.S. Attorney

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18 Attorneys for Defendant

19 ORDER

20 APPROVED AND SO ORDERED.

21 Dated: November 16, 2017.

22 
23 EDMUND F. BRENNAN
24 UNITED STATES MAGISTRATE JUDGE
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STIPULATION TO EXTENSION OF TIME FOR PLAINTIFF TO FILE MOTION FOR
SUMMARY JUDGMENT, AND ~~PROPOSED~~ ORDER; CASE NO. 2:17-CV-01069-EFB