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9 Attorneys for Defendant

10 UNITED STATES DISTRICT COURT  
 11 EASTERN DISTRICT OF CALIFORNIA  
 12 SACRAMENTO DIVISION  
 13

14 ANGELEKA M. SMITH-WINSTON,	)	Civil No. 2:17-cv-01901-AC
	)	
15 Plaintiff,	)	<b>STIPULATION AND PROPOSED ORDER</b>
	)	<b>FOR A SECOND EXTENSION OF TIME</b>
16 v.	)	<b>FOR DEFENDANT TO FILE HER MSJ</b>
	)	
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 second extension of time of 15 days  
 23 to file her MSJ. Defendant has had the opportunity to review Plaintiff's MSJ and the Certified  
 24 Administrative Record, and believes that voluntary remand may be appropriate. Currently, the  
 25 Appeals Council is evaluating the record, and the undersigned anticipates a response within  
 26 about 10 days.

28 Stip. to Extend Def.'s MSJ

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The new due date for Defendant's MSJ will be Tuesday, July 3, 2018.

Respectfully submitted,

Date: June 18, 2018

LAW OFFICES OF LAWRENCE D. ROHLFING

By: /s/ Steven Rosales\*  
STEVEN ROSALES  
\* By email authorization on June 18, 2018  
Attorney for Plaintiff

Date: June 18, 2018

MCGREGOR W. SCOTT  
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: June 19, 2018

  
\_\_\_\_\_  
ALLISON CLAIRE  
UNITED STATES MAGISTRATE JUDGE

Stip. to Extend Def.'s MSJ