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9 Attorneys for Defendant

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

14	ROBERT TURNER,)	Civil No. 2:18-cv-00022-AC
)	
15	Plaintiff,)	STIPULATION AND PROPOSED ORDER
)	FOR A FIRST EXTENSION OF TIME
16	v.)	FOR DEFENDANT TO FILE HER MSJ
)	
17	NANCY A. BERRYHILL,)	
18	Acting Commissioner of Social Security,)	
)	
19	Defendant.)	
20)	

21
 22 IT IS HEREBY STIPULATED by the parties, and with the approval of the Court, that
 23 Defendant shall have a first extension of time of 30 days to file her MSJ. Defendant respectfully
 24 requests this extension to further consider the certified administrative record and the medical
 25 records submitted with Plaintiff’s Request for Remand, especially in light of his *pro se* status.

28 Stip. to Extend Def.’s MSJ

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The new due date for Defendant's MSJ will be Wednesday, November 28, 2018.

Respectfully submitted,

Date: October 29, 2018

By: /s/ Robert Turner*

ROBERT TURNER
* By phone authorization on October 29, 2018
Plaintiff

Date: October 29, 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: October 30, 2018


ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE

Stip. to Extend Def.'s MSJ