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1	McGREGOR W. SCOTT		
$1 \mid$	DEBORAH LEE STACHEL Regional Chief Counsel, Region IX Social Security Administration		
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3			
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8	Attorneys for Defendant		
9	UNITED STATES DISTRICT COURT		
10	EASTERN DISTRICT OF CALIFORNIA		
11			
12	FRESNO DIVISION		
13			
14	PHOEUN PHANG,		
) 2:20-cv-00586-WBS-DMC		
15	vs.) STIPULATION AND ORDER FOR AN		
16	ANDREW SAUL, Commissioner of Social Security, (Commissioner of Social Security, (Commissioner of Social Security, (Commissioner of Social Security, (Commissioner of Social Security, (Commissioner of Social Security, (Commissioner of Social Security, (Commissioner of Social Security, (Commissioner of Social Security)		
17	Defendant.		
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21	IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that Defendant shall have a 31-day extension of time from November 13, 2020 to December 14, 2020 to respond to Plaintiff's motion for summary judgment. Defendant's counsel needs additional time to review the record and draft the responsive brief. Since Plaintiff filed the opening brief, Defendant's counsel has completed several briefs and held trainings for the office's new attorneys. Defendant's counsel apologizes to the Court and Plaintiff for this		
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26	delay.		
27	delay.		

This request is made in good faith with no intention to unduly delay the proceedings.

1	The parties further stipulate that the Court's Scheduling Order shall be modified		
2	accordingly.		
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4		Respectfully submitted,	
5	Dated: November 11, 2020	/s/ Jacqueline A. Forslund by Chantal R. Jenkins*	
6		*As authorized via email on November 11, 2020 Jacqueline Anna Forslund	
7		Attorney for Plaintiff	
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9	Dated: November 11, 2020	McGREGOR W. SCOTT United States Attorney	
10		DEBORAH LEE STACHEL	
11		Regional Chief Counsel, Region IX Social Security Administration	
12			
13	В	y: <u>/s/ Chantal R. Jenkins</u> CHANTAL R. JENKINS	
14		Special Assistant United States Attorney	
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17		ORDER	
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19	APPROVED AND SO ORDERED:		
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$\begin{bmatrix} 21 \\ 22 \end{bmatrix}$	Datad: Navambar 17, 2020		
23	Dated: November 17, 2020	DENNIS M. COTA	
24		UNITED STATES MAGISTRATE JUDGE	
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