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10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA
 12 SAN FRANCISCO DIVISION

14	TERREA LYNN SULLIVAN,)	No. 3:15-cv-03555-MEJ
)	
15	Plaintiff,)	STIPULATION AND PROPOSED ORDER
)	FOR A THIRD EXTENSION OF TIME
16	v.)	FOR DEFENDANT TO FILE HER
)	MOTION FOR SUMMARY JUDGMENT
17	CAROLYN W. COLVIN,)	
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 third extension of time of 7 days to
 23 file her motion for summary judgment. Defendant respectfully request this additional time
 24 because after reviewing the evidence of record and Plaintiff’s contentions, the undersigned
 25 believes that this case warrants consideration for voluntary remand in lieu of further litigation.
 26 The additional seven days will the agency to complete its review and makes its determination.

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 28 Stipulation to Extend Def.’s MSJ

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The new due date for Defendant's motion for summary judgment will be Friday, April 15, 2016.

Respectfully submitted,

Date: April 8, 2016

LAW OFFICES OF LAWRENCE D. ROHLFING

By: /s/ Young Chul Cho*
YOUNG CHUL CHO
* By email authorization on April 8, 2016
Attorney for Plaintiff

Date: April 8, 2016

MELINDA HAAG
United States Attorney

By: /s/ Jeffrey Chen
JEFFREY CHEN
Special Assistant United States Attorney
Attorneys for Defendant

ORDER

APPROVED AND SO ORDERED:

DATED: April 8, 2016



HONORABLE MARIA-ELENA JAMES
UNITED STATES MAGISTRATE JUDGE

Stipulation to Extend Def.'s MSJ