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Attorneys for Defendant

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

DEBORA L. RAMIREZ,

Plaintiff,

v.

CAROLYN W. COLVIN,
Acting Commissioner of Social Security,

Defendant.

) Case No.: 5:16-cv-1493-RMW

) STIPULATION AND ~~PROPOSED~~ ORDER
) FOR A FIRST EXTENSION OF TIME

Defendant moves, through her counsel of record, that the time for responding to Plaintiff's Complaint be extended to August 22, 2016. This is Defendant's first request for an extension of time to respond to Plaintiff's complaint. Defendant respectfully requests this additional time because additional time is needed to prepare the certified administrative record. Defendant's counsel spoke with Plaintiff on the phone, and she agrees to an extension.

With this extension, the Court's scheduling order would be modified as follows:

- Plaintiff shall serve and file a motion for summary judgment or for remand within 28 days of service of defendant's answer (on or before September 19, 2016);

- Defendant shall serve and file any opposition or countermotion within thirty days of service of Plaintiff's motion (on or before October 17, 2016); and
- Plaintiff may serve and file a reply within fourteen days of service of defendant's opposition or counter-motion (on or before October 31, 2016).

Respectfully submitted,

Dated: July 26, 2016

/s/ David F. Chermol
(*as authorized via e-mail on 7/27/2016)
DAVID F. CHERMOL
Attorney for Plaintiff

Dated: July 26, 2016

BENJAMIN B. WAGNER
United States Attorney
DEBORAH LEE STACHEL
Acting Regional Chief Counsel, Region IX
Social Security Administration

By: /s/ Marcelo Illarmo
MARCELO ILLARMO
Special Assistant United States Attorney

Attorneys for Defendant

ORDER

APPROVED AND SO ORDERED:

Dated: 7/26/2016


THE HONORABLE RONALD M. WHYTE
United States District Court Judge