

1 BENJAMIN B. WAGNER
 2 United States Attorney
 3 DONNA L. CALVERT
 4 Acting Regional Chief Counsel, Region IX
 5 Social Security Administration
 6 LYNN M. HARADA, CSBN 267616
 7 Special Assistant United States Attorney
 8 160 Spear Street, Suite 800
 9 San Francisco, California 94105
 10 Telephone: (415) 977-8977
 11 Facsimile: (415) 744-0134
 12 E-Mail: Lynn.Harada@ssa.gov

13 Attorneys for Defendant

14 **UNITED STATES DISTRICT COURT**
 15 **EASTERN DISTRICT OF CALIFORNIA**

16 ANABEL L. QUINTERO,)	Case No.: 1:13-cv-00478-SKO
17 Plaintiff,)	
18 vs.)	STIPULATION AND PROPOSED ORDER
19 CAROLYN W. COLVIN,)	FOR AN EXTENSION OF TIME
20 Acting Commissioner of Social Security,)	
21 Defendant.)	(Docket No. 14)
22)	
23)	
24)	
25)	
26)	
27)	
28)	

29 IT IS HEREBY STIPULATED, by and between the parties, through their respective
 30 counsel of record, that the time for Defendant to respond to Plaintiff's Motion for Summary
 31 Judgment be extended by 30 days until January 27, 2014. This is Defendant's first request for an
 32 extension of time to respond to Plaintiff's motion. Defense counsel needs the additional time to
 33 further review the file and prepare a response in this matter due to pre-approved leave and a
 34 heavy workload, despite due diligence.

1 The parties further stipulate that the remaining dates in the Court's Scheduling Order
2 shall be modified accordingly.

3 Defense counsel apologizes to the Court for any inconvenience caused by this delay.

4
5 Respectfully submitted,

6 Dated: December 24, 2013

/s/ Lynn M. Harada for Kelsey Mackenzie Brown
(*as authorized via email on 12/24/13)
KELSEY MACKENZIE BROWN
Attorney for Plaintiff

7
8
9
10 Dated: December 24, 2013

BENJAMIN B. WAGNER
United States Attorney
DONNA L. CALVERT
Acting Regional Chief Counsel, Region IX
Social Security Administration

11
12
13
14 By: /s/ Lynn M. Harada
LYNN M. HARADA
Special Assistant U.S. Attorney

15
16 Attorneys for Defendant

17
18 **ORDER**

19 Pursuant to the parties' above stipulation, IT IS HEREBY ORDERED that:

- 20 1. The parties' stipulated request for an extension of time for Defendant to file a
21 responsive brief is GRANTED;
22
23 2. Defendant's responsive brief shall be filed **on or before January 27, 2014**; and
24 3. Plaintiff may file an optional reply brief **on or before February 11, 2014**.

25 IT IS SO ORDERED.

26 Dated: **January 2, 2014**

/s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE