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8 Attorneys for Defendant

9 UNITED STATES DISTRICT COURT
10 EASTERN DISTRICT OF CALIFORNIA
11 FRESNO DIVISION

12 MARIA M. RAMIREZ) Case No.: 1:13-CV-00513-GSA
13 Plaintiff,)
v.) STIPULATION AND ORDER TO EXTEND
14 CAROLYN W. COLVIN, Acting) BRIEFING SCHEDULE
15 Commissioner of Social Security,)
16 Defendant.)
17)

18 IT IS HEREBY STIPULATED by the parties, through their undersigned attorneys, that
19 Defendant shall have a first extension of time of fourteen (14) days, from December 23, 2013 to
20 January 6, 2013, to file her response to Plaintiff's opening brief. This is Defendant's first request
21 for an extension.

22 Defense counsel mistakenly overlooked the fact that Plaintiff filed her brief eight days
23 early, thereby adjusting the briefing schedule. Moreover, notwithstanding the return of all
24 attorneys subsequent the September 2013 furlough, the Office of the General Counsel for the
25 Social Security Administration has a substantial backlog of work as a result of the lapse in
26 appropriations. The Office of the General Counsel is working diligently to prioritize and work
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1 through this backlog as efficiently as possible. As such, the Acting Commissioner requests a 14-
2 day extension of time for filing the Commissioner's brief, with all other dates in the Court's CMO
3 to be extended accordingly.

4 Respectfully submitted,

5 Date: December 31, 2013

/s/Christopher Dellert for Kelsey Mackenzie Brown

6 KELSEY MACKENZIE BROWN

Dellert Baird Law Office, PLLC

7 Attorneys for Plaintiff

**By email authorization on December 24, 2013*

8 Date: December 31, 2013

9 BENJAMIN B. WAGNER

United States Attorney

10 By: /s/Susan L. Smith

11 SUSAN L. SMITH

Special Assistant U.S. Attorney

12 Attorneys for Defendant

13 Of Counsel
14 Tina Saladino
Assistant Regional Counsel
15 Social Security Administration

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19 ORDER

20 Pursuant to the above stipulation, Defendant's Opposition shall be filed no later than
21 January 6, 2014. All other deadlines outlined in this Court's scheduling order shall be modified
22 accordingly.

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26 IT IS SO ORDERED.

Dated: December 31, 2013

/s/ Gary S. Austin
UNITED STATES MAGISTRATE JUDGE

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