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

12 RICHARD FRANK BERNAL,) Case No. 1:13-cv-0707-BAM
13)
Plaintiff,) **STIPULATION AND ORDER TO**
14) **EXTEND BRIEFING SCHEDULE**
v.)
15)
16 CAROLYN W. COLVIN)
Acting Commissioner of Social Security,)
17)
Defendant.)
18)
19

20 IT IS HEREBY STIPULATED by the parties, through their undersigned attorneys, to
21 extend Defendant's time to file her response to Plaintiff's Motion for Attorney Fees with the
22 Court by 30 days to August 5, 2015, and that all other scheduling dates set forth in the Court's
23 Case Management Order shall be extended accordingly. This is Defendant's first request for an
24 extension of time in this matter.

25 There is good cause for this extension because counsel for Defendant will be on leave for
26 portions of the next two weeks. There is also good cause for this extension because counsel for
27 Defendant is currently responsible for numerous district court cases at various stages of
28

1 litigation, as well as conducting discovery and preparing substantive motions in proceedings
2 before the Equal Employment Opportunity Commission and Merit Systems Protection Board.

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4 Respectfully submitted,

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6 Date: June 23, 2015

LAW OFFICES OF HELEN R. ZNE

7 By: /s/ Asim H. Modi for Helen R. Zane*

HELEN R. ZANE

*Authorized by email on June 23, 2015

Attorneys for Plaintiff

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9
10 Date: June 23, 2015

BENJAMIN B. WAGNER

United States Attorney

DONNA L. CALVERT

Regional Chief Counsel, Region IX

Social Security Administration

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14 By: /s/ Asim H. Modi

ASIM H. MODI

Special Assistant United States Attorney

Attorneys for Defendant

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18 ORDER

19 Based upon the stipulation of the parties, and for cause shown, IT IS HEREBY
20 ORDERED that the Defendant's deadline to file a response to Plaintiff's Motion for Attorney is
21 extended to August 5, 2015.

22 IT IS SO ORDERED.

23 Dated: July 2, 2015

/s/ Barbara A. McAuliffe

UNITED STATES MAGISTRATE JUDGE