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Attorneys for Defendant

10 UNITED STATES DISTRICT COURT
 11 EASTERN DISTRICT OF CALIFORNIA

| | | | |
|----|---|---|------------------------------------|
| 13 | PATRICIA IRENE PERRY, |) | CIVIL NO. 1:14-CV-00825-SMS |
| | |) | |
| 14 | Plaintiff, |) | STIPULATION AND ORDER FOR A |
| 15 | v. |) | FIRST EXTENSION OF TIME FOR |
| | |) | DEFENDANT TO RESPOND TO |
| 16 | CAROLYN W. COLVIN, |) | PLAINTIFF’S MOTION FOR |
| | |) | SUMMARY JUDGMENT |
| 17 | Acting Commissioner of Social Security, |) | |
| | |) | |
| 18 | Defendant. |) | |
| | |) | |
| 19 | |) | |

21 IT IS HEREBY STIPULATED, by and between the parties, through their respective
 22 counsel of record, that Defendant shall have a first extension of time of 45 days to respond to
 23 Plaintiff’s opening brief. There is good cause for this extension because of Assistant Regional
 24 Counsel Henry Chi’s workload. Despite his diligent efforts, competing deadlines necessitate an
 25 extension. Additionally, Defendant needs additional time to respond to Plaintiff’s arguments.

1 Given these factors, Defendant respectfully requests an extension and Plaintiff also consents to
2 this extension.

3 The current due date is March 23, 2015. The new due date will be May 7, 2015. The
4 parties further stipulate that the Court's Scheduling Order shall be modified accordingly.

5
6 Respectfully submitted,

8 Dated: March 17, 2015 /s/ Jacqueline Anna Forslund
9 (by email authorization on March 17, 2015)
10 Jacqueline Anna Forslund
11 Attorney for Plaintiff

12 Dated: March 19, 2015 BENJAMIN B. WAGNER
13 United States Attorney

14 By: /s/ Henry L. Chi
15 Henry L. Chi
16 Special Assistant U.S. Attorney
17 Attorneys for Defendant

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19
20 ORDER

21 APPROVED AND SO ORDERED.

22 DATED: 3/20/2015 /s/ SANDRA M. SNYDER
23 UNITED STATES MAGISTRATE JUDGE