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Attorneys for Defendant

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

PATRICIA IRENE PERRY,)	CIVIL NO. 1:14-CV-00825-SMS
)	
Plaintiff,)	STIPULATION AND ORDER FOR A
v.)	SECOND EXTENSION OF TIME FOR
)	DEFENDANT TO RESPOND TO
CAROLYN W. COLVIN,)	PLAINTIFF'S MOTION FOR
)	SUMMARY JUDGMENT
Acting Commissioner of Social Security,)	
)	
Defendant.)	
)	
)	

IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that Defendant shall have a second extension of time of 45 days to respond to Plaintiff's opening brief. Defendant apologizes for seeking a second extension and expects to file the response by the extended deadline. There is good cause for this extension because

1 Defendant's counsel has competing deadlines that necessitate immediate attention – including
2 other district court matters, employment matters, and an oral argument. Given these factors,
3 Defendant respectfully requests an extension and Plaintiff also consents to this extension.

4 The current due date is May 7, 2015. The new due date will be June 22, 2015. The
5 parties further stipulate that the Court's Scheduling Order shall be modified accordingly.
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8 Respectfully submitted,

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10 Dated: May 4, 2015

/s/ Jacqueline Anna Forslund
(by email authorization on May 4, 2015)
Jacqueline Anna Forslund
Attorney for Plaintiff

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13 Dated: May 4, 2015

BENJAMIN B. WAGNER
United States Attorney

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16 By: /s/ Henry L. Chi
Henry L. Chi
Special Assistant U.S. Attorney

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18 Attorneys for Defendant
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22 ORDER

23 APPROVED AND SO ORDERED.

24 DATED: 5/5/2015

/s/ SANDRA M. SNYDER
UNITED STATES MAGISTRATE JUDGE