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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

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

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

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

Respectfully submitted,

Dated: May 4, 2015

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

Dated: May 4, 2015

BENJAMIN B. WAGNER  
United States Attorney

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

Attorneys for Defendant

## ORDER

APPROVED AND SO ORDERED.

DATED: 5/5/2015

/s/ SANDRA M. SNYDER  
UNITED STATES MAGISTRATE JUDGE