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

14 AGUEDA VALENCIA,) Civil No. 1:14-cv-01330-BAM
15 Plaintiff,)
16 v.) **STIPULATION AND ORDER FOR A**
17) **FIRST EXTENSION OF TIME FOR**
18 CAROLYN W. COLVIN,) **DEFENDANT TO FILE HER MOTION**
Acting Commissioner of Social Security,) **FOR SUMMARY JUDGMENT**
19 Defendant.)
20)

21 IT IS HEREBY STIPULATED by the parties, through their undersigned attorneys, and
22 with the approval of the Court, that Defendant shall have a second extension of time of 30 days
23 to file her motion for summary judgment. Defendant respectfully requests this additional time
24 because he has a very a heavy workload despite due diligence.

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28 Stip. to Extend Def.'s MSJ

1 The new due date for Defendant's motion for summary judgment will be Monday, July 6,
2 2015.

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4 Respectfully submitted,
5 Date: June 4, 2015 NEWEL LAW
6 By: /s/ Melissa Newel*
7 MELISSA NEWEL
8 * By email authorization on June 2, 2015
Attorney for Plaintiff

9 Date: June 4, 2015 BENJAMIN B. WAGNER
10 United States Attorney
11 By: /s/ Jeffrey Chen
12 JEFFREY CHEN
13 Special Assistant United States Attorney
14 Attorneys for Defendant

15 **ORDER**

16 Based upon the stipulation of the parties, and for cause shown, IT IS HEREBY
17 ORDERED, that Defendant shall have an extension of time, up to and including July 6, 2015, in
18 which to file a cross motion for summary judgment. All other deadlines set forth in the August
19 28, 2014 Case Management Order are modified accordingly.
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21 IT IS SO ORDERED.

22 Dated: June 5, 2015 /s/ Barbara A. McAuliffe
23 UNITED STATES MAGISTRATE JUDGE
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