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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,	)	<b>STIPULATION AND ORDER FOR A</b>
		)	<b>SECOND EXTENSION OF TIME FOR</b>
16	v.	)	<b>DEFENDANT TO FILE HER MOTION</b>
		)	<b>FOR SUMMARY JUDGMENT</b>
17	CAROLYN W. COLVIN,	)	
18	Acting Commissioner of Social Security,	)	
		)	
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 to  
 24 further evaluate a lengthy certified administrative record and because of a preplanned vacation  
 25 this month.

26  
 27  
 28 Stip. to Extend Def.'s MSJ

1 The new due date for Defendant's motion for summary judgment will be Wednesday,  
2 August 5, 2015.

3  
4 Respectfully submitted,

5 Date: July 6, 2015

NEWEL LAW

6 By: /s/ Melissa Newel\*

MELISSA NEWEL

7 \* By email authorization on July 6, 2015

8 Attorney for Plaintiff

9 Date: July 6, 2015

BENJAMIN B. WAGNER

10 United States Attorney

11 By: /s/ Jeffrey Chen

JEFFREY CHEN

12 Special Assistant United States Attorney

13 Attorneys for Defendant

14  
15  
16 **ORDER**

17 Based upon the stipulation of the parties, and for cause shown, IT IS HEREBY  
18 ORDERED, that Defendant shall have an extension of time, up to and including August 7, 2015,  
19 in which to file a cross motion for summary judgment. All other deadlines set forth in the  
20 August 28, 2014 Case Management Order are modified accordingly.  
21

22  
23 IT IS SO ORDERED.

24 DATED: 7/8/2015

/s/ Barbara A. McAuliffe

25 UNITED STATES MAGISTRATE JUDGE  
26  
27  
28