| 1 | BENJAMIN B. WAGNER | | |
|----|--|--|--|
| 2 | United States Attorney DEBORAH LEE STACHEL | | |
| 3 | Acting Regional Chief Counsel, Region IX | | |
| 4 | Social Security Administration JEFFREY CHEN, CSBN 260516 | | |
| 5 | Special Assistant United States Attorney | | |
| 6 | Social Security Administration 160 Spear Street, Suite 800 | | |
| | San Francisco, CA 94105 | | |
| 7 | Telephone: (415) 977-8939 Facsimile: (415) 744-0134 | | |
| 8 | Email: Jeffrey.Chen@ssa.gov | | |
| 9 | Attorneys for Defendant | | |
| 10 | UNITED STATES DISTRICT COURT | | |
| 11 | EASTERN DISTRICT OF CALIFORNIA | | |
| 12 | FRESNO DIVISION | | |
| 13 | JAMES KEITH MARTIN, | Civil No. 1:15-cv-01660-BAM | |
| 14 | JAMES KEITTI WARTIN, | Civil No. 1.13-CV-01000-DAW | |
| 15 | Plaintiff, | STIPULATION AND ORDER FOR A FIRST EXTENSION OF TIME FOR | |
| 16 | V. | DEFENDANT TO FILE HER | |
| 17 | CAROLYN W. COLVIN, | RESPONSIVE BRIEF | |
| 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 first extension of time of 30 days to | | |
| 23 | file her responsive brief. Defendant respectfully requests this additional time because of a heavy | | |
| 24 | accumulated workload following a two week absence from the office in Taiwan as a result of the | | |
| 25 | passing of the undersigned's grandfather. | | |
| 26 | | | |
| 27 | | | |
| 28 | Stip. to Extend Def.'s Brief | | |
| | | | |
| | | 1 | |

| 1 | | |
|--------|--|--|
| 1 | The new due date for Defendant's responsive brief will be Monday, August 15, 2016. | |
| 2 3 | | Respectfully submitted, |
| 4 | Date: <u>July 18, 2016</u> | YOUNG CHUL CHO |
| 5 | By: | /s/ James Pi* |
| 6 | | JAMES PI * By email authorization on July 18, 2016 |
| 7 | | Attorney for Plaintiff |
| 8 | Date: <u>July 18, 2016</u> | BENJAMIN B. WAGNER |
| 9 | | United States Attorney |
| 10 | By: | /s/ Jeffrey Chen |
| 11 | | JEFFREY CHEN Special Assistant United States Attorney |
| 12 | | Attorneys for Defendant |
| 13 | | |
| 14 | | |
| 15 | | ORDER |
| 16 | Based upon the stipulation of the parties, and for cause shown, IT IS HEREBY | |
| 17 | ORDERED, that Defendant shall have a 30-day extension, or until August 15, 2016, in which to | |
| 18 | file an Opposition to Plaintiff's Opening Brief; and that all other deadlines set forth in the | |
| 19 | November 3, 2015 Case Management Order shall be extended accordingly. | |
| 20 | | |
| 21 | IT IS SO ORDERED. | |
| 22 | | |
| 23 | Dated: July 18, 2016 /s/ Barbara A. McAuliffe | |
| 24 | | |
| 25 | | |
| 26 | | |
| 27 | | |
| 28 | | |
| | | |
| | 2 | |
| | 1 | |