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8 Attorneys for Defendant

10 **UNITED STATES DISTRICT COURT**  
 11 **EASTERN DISTRICT OF CALIFORNIA**

13 MARIO LAMONT BROWN,	)	Case No.: 2:12-cv-02313-EFB
14 Plaintiff,	)	STIPULATION AND PROPOSED ORDER
15 vs.	)	FOR AN EXTENSION OF TIME
16 CAROLYN W. COLVIN,	)	
Acting Commissioner of Social Security,	)	
17 Defendant.	)	
18	)	

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20 IT IS HEREBY STIPULATED, by and between the parties, through their respective  
 21 counsel of record, that the time for Defendant to respond to Plaintiff’s Motion for Summary  
 22 Judgment be extended 35 days to and including January 28, 2016. This is Defendant’s first  
 23 request for an extension of time to respond to Plaintiff’s motion. Defense counsel needs the  
 24 additional time to further review the file and prepare a response in this matter due to a heavy  
 25 workload, including several other district court cases, despite due diligence.

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1 The parties further stipulate that the remaining dates in the Court's Scheduling Order  
2 shall be modified accordingly.

3 Defense counsel apologizes to the Court for any inconvenience caused by this delay.

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5 Respectfully submitted,

6 Dated: December 23, 2015

/s/ Lynn M. Harada for Peter Brixie\*  
(\*as authorized via email on 12/23/15)  
PETER BRIXIE  
Attorney for Plaintiff

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9  
10 Dated: December 23, 2015

BENJAMIN B. WAGNER  
United States Attorney  
DEBORAH LEE STACHEL  
Acting Regional Chief Counsel, Region IX  
Social Security Administration


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14 By: /s/ Lynn M. Harada  
LYNN M. HARADA  
Special Assistant U.S. Attorney

15  
16 Attorneys for Defendant

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19 ORDER

20 APPROVED AND SO ORDERED.

21  
22 Dated: December 29, 2015.

  
THE HONORABLE EDMUND F. BRENNAN  
United States Magistrate Judge