1	BENJAMIN B. WAGNER		
2	United States Attorney DONNA L. CALVERT		
3	Acting Regional Chief Counsel, Region IX		
4	Social Security Administration JEFFREY CHEN, CSBN 260516 Special Assistant United States Attorney Social Security Administration 333 Market St., Suite 1500 San Francisco, CA 94105 Telephone: (415) 977-8939 Facsimile: (415) 744-0134 Emeilt Leffrey Chen @ese, and		
5			
6			
7			
8			
9	Email: Jeffrey.Chen@ssa.gov Attorneys for Defendant		
10	UNITED STATES DISTRICT COURT		
11	EASTERN DISTRICT OF CALIFORNIA		
12	SACRAMENTO DIVISION		
13			
14	BONNIE HAWTHORNE,) No. 2:12-CV-02790-KJN	
15	Plaintiff,) STIPULATION AND PROPOSED ORDER	
16	v.) FOR A FIRST EXTENSION OF TIME) FOR DEFENDANT TO FILE HER	
17	CAROLYN W. COLVIN,) MOTION FOR SUMMARY JUDGMENT	
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 motion for summary judgment. Defendant respectfully request this additional time		
24	because of a preplanned family vacation to the east coast and because of a heavy workload		
25	despite due diligence in managing his calendar.		
26	////		
27	////		
28	Stip. to Extend Def.'s MSJ		
		1	
		1	

 September 27, 2013. Respectfully submitted, Date: <u>August 26, 2013</u> LAW OFFICES OF PETER BRIXIE By: <u>/s/ Peter Brixie*</u> PETER BRIXIE * By email authorization on August 26 Attorney for Plaintiff Date: <u>August 27, 2013</u> BENJAMIN B. WAGNER United States Attorney By: <u>/s/ Jeffrey Chen</u> JEFFREY CHEN Special Assistant United States Attorney Attorneys for Defendant 	
4 Respectfully submitted, 5 Date: August 26, 2013 LAW OFFICES OF PETER BRIXIE 6 By: /s/ Peter Brixie* 7 PETER BRIXIE 8 PETER BRIXIE 9 Date: August 27, 2013 BENJAMIN B. WAGNER 10 Date: August 27, 2013 BENJAMIN B. WAGNER 11 By: /s/ Jeffrey Chen JEFFREY CHEN 12 Special Assistant United States Attorney 13 Attorneys for Defendant	
4 5 Date: August 26, 2013 LAW OFFICES OF PETER BRIXIE 6 By: /s/ Peter Brixie* 7 By: /s/ Peter Brixie* 8 PETER BRIXIE 8 PETER BRIXIE 9 Date: August 27, 2013 BENJAMIN B. WAGNER 10 Date: August 27, 2013 BENJAMIN B. WAGNER 11 By: /s/ Jeffrey Chen 12 JEFFREY CHEN Special Assistant United States Attorned 13 Attorneys for Defendant	
6 By: /s/ Peter Brixie* 7 PETER BRIXIE 8 PETER BRIXIE 9 Date: August 27, 2013 10 BENJAMIN B. WAGNER 10 United States Attorney 11 By: /s/ Jeffrey Chen 12 JEFFREY CHEN 13 Special Assistant United States Attorney	
 PETER BRIXIE * By email authorization on August 26 Attorney for Plaintiff Date: <u>August 27, 2013</u> BENJAMIN B. WAGNER United States Attorney By: <u>/s/ Jeffrey Chen</u> JEFFREY CHEN Special Assistant United States Attorney Attorneys for Defendant 	
 7 8 9 9 Date: <u>August 27, 2013</u> 10 11 12 13 * By email authorization on August 26 Attorney for Plaintiff BENJAMIN B. WAGNER United States Attorney By: <u>/s/ Jeffrey Chen</u> JEFFREY CHEN Special Assistant United States Attorney Attorneys for Defendant 	
 9 Date: <u>August 27, 2013</u> 10 11 12 13 Date: <u>August 27, 2013</u> BENJAMIN B. WAGNER United States Attorney By: <u>/s/ Jeffrey Chen</u> JEFFREY CHEN Special Assistant United States Attorney Attorneys for Defendant 	2013
10 United States Attorney 11 By: /s/ Jeffrey Chen 12 JEFFREY CHEN 13 Special Assistant United States Attorney	
10 By: /s/ Jeffrey Chen 11 JEFFREY CHEN 12 Special Assistant United States Attorneys for Defendant 13 Attorneys for Defendant	
12 JEFFREY CHEN 12 Special Assistant United States Attorneys for Defendant 13 Attorneys for Defendant	
13 Attorneys for Defendant	
13	y
14	
15	
16 ORDER	
17	
18 APPROVED AND SO ORDERED:	
¹⁹ Dated: August 29, 2013	
20 Rendall D. Newman	
21 22 KENDALL J. NEWMAN UNITED STATES MAGISTRATE JU	DGE
22 23	
24	
25	
26	
27 Stip. to Extend Def.'s MSJ	
28	
2	