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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,)
16 v.) **STIPULATION AND ~~PROPOSED ORDER~~**
17) **FOR A FIRST EXTENSION OF TIME**
18) **FOR DEFENDANT TO FILE HER**
19) **MOTION FOR SUMMARY JUDGMENT**
20 CAROLYN W. COLVIN,)
Acting Commissioner of Social Security,)
21 Defendant.)
_____)

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.

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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 Friday,
2 September 27, 2013.

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4 Respectfully submitted,

5 Date: August 26, 2013

LAW OFFICES OF PETER BRIXIE

6 By: /s/ Peter Brixie*

PETER BRIXIE

* By email authorization on August 26, 2013

7 Attorney for Plaintiff

8
9 Date: August 27, 2013

BENJAMIN B. WAGNER

United States Attorney

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11 By: /s/ Jeffrey Chen

JEFFREY CHEN

Special Assistant United States Attorney

12 Attorneys for Defendant

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16 ORDER

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18 APPROVED AND SO ORDERED:

19 Dated: August 29, 2013

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21 
22 KENDALL J. NEWMAN
23 UNITED STATES MAGISTRATE JUDGE

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26 Stip. to Extend Def.'s MSJ