

1 BENJAMIN B. WAGNER
United States Attorney
2 DONNA L. CALVERT
Acting Regional Chief Counsel, Region IX
3 Social Security Administration
4 JEFFREY CHEN, CSBN 260516
Special Assistant United States Attorney
5 Social Security Administration
6 333 Market St., Suite 1500
San Francisco, CA 94105
7 Telephone: (415) 977-8939
8 Facsimile: (415) 744-0134
Email: Jeffrey.Chen@ssa.gov
9 Attorneys for Defendant

10 UNITED STATES DISTRICT COURT
11 EASTERN DISTRICT OF CALIFORNIA
12 SACRAMENTO DIVISION
13

14 MEE CHA,) No. 2:13-CV-00179-CKD
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,)
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 he has just returned from a preplanned family vacation to the east coast and because of a
25 heavy workload despite due diligence in managing his calendar.

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1 The new due date for Defendant's motion for summary judgment will be Monday,
2 October 7, 2013.

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4 Respectfully submitted,

5 Date: September 6, 2013

JESSE S. KAPLAN, ATTORNEY AT LAW

6 By: /s/ Jesse Kaplan*

JESSE KAPLAN

7 * By email authorization on September 5, 2013

8 Attorney for Plaintiff

9 Date: September 6, 2013

BENJAMIN B. WAGNER

10 United States Attorney

11 By: /s/ Jeffrey Chen

JEFFREY CHEN

12 Special Assistant United States Attorney

13 Attorneys for Defendant

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17 ORDER

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19 APPROVED AND SO ORDERED:

20 Dated: September 10, 2013



21 CAROLYN K. DELANEY

22 UNITED STATES MAGISTRATE JUDGE

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26 Stip. to Extend Def.'s MSJ