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

12 DANNIE SANCHEZ, ) Civil No. 2:13-cv-00786-KJN  
13 )  
14 Plaintiff, ) **STIPULATION AND PROPOSED ORDER**  
15 v. ) **TO EXTEND TIME**  
16 CAROLYN W. COLVIN, Acting )  
Commissioner of Social Security, )  
17 )  
18 Defendant. )  
19

20 IT IS HEREBY STIPULATED by the parties, through their undersigned attorneys, to extend  
21 the time by 45 days, to January 22, 2014, for Defendant to file either a Stipulation to Remand or her  
22 Opposition to Plaintiff Motion for Summary Judgment, according to the Court's Scheduling Order  
23 ("Order"). This extension is requested because the parties are engaged in extended good faith  
24 settlement negotiations. Defendant respectfully requests additional time in order to pursue possible  
25 settlement.  
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1 The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.

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4 Respectfully submitted,

5 Date: December 9, 2013

Dellert Baird Law Offices, PLLC

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7 By: /s/ Kelsey Mackenzie Brown\*  
KELSEY MACKENZIE BROWN  
8 \*By email authorization

9 Attorney for Plaintiff

10 Date: December 9, 2013

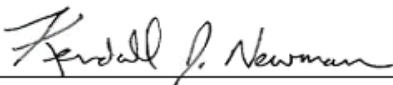
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14 By: /s/ Paul Sachelari  
PAUL SACHELARI  
Special Assistant United States Attorney  
Attorneys for Defendant

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18 ORDER

19 APPROVED AND SO ORDERED.

20 Dated: December 12, 2013

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23 \_\_\_\_\_  
KENDALL J. NEWMAN  
UNITED STATES MAGISTRATE JUDGE