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9   Attorneys for Defendant

10              UNITED STATES DISTRICT COURT

11             EASTERN DISTRICT OF CALIFORNIA

12                  SACRAMENTO DIVISION

13

14  LISA ANN DUBOIS,                    )  No. 2:13-CV-00827-CKD
                                        )
15          Plaintiff,                  )  **STIPULATION AND ~~PROPOSED~~ ORDER**
                                        )  **FOR A FIRST EXTENSION OF TIME**
16          v.                          )  **FOR DEFENDANT TO FILE HER**
                                        )  **MOTION FOR SUMMARY JUDGMENT**
17  CAROLYN W. COLVIN,                  )
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 requests this additional time

24  because of a very heavy workload and because of preplanned leave for the holiday seasons.

25  Despite due diligence, Defendant requests this additional time to properly manage his caseload.

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28  Stip. to Extend Def.'s MSJ


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1      The new due date for Defendant's motion for summary judgment will be Monday,

2 January 20, 2014.

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4                                 Respectfully submitted,

5 Date: *December 19, 2013*         LAW OFFICES OF ANN M. CERNEY

6                   By:   */s/ Ann M. Cerney*_____

                             ANN M. CERNEY

7                              *\* By email authorization on Dec. 17, 2013*

8                              Attorney for Plaintiff

9 Date: *December 19, 2013*         BENJAMIN B. WAGNER

                             United States Attorney

10

11                   By:   */s/ Jeffrey Chen*_____

                             JEFFREY CHEN

12                              Special Assistant United States Attorney

13                              Attorneys for Defendant

14

15

16

17                             ORDER

18

19 APPROVED AND SO ORDERED:

20 Dated:  December 23, 2013

21 _____

                           CAROLYN K. DELANEY

22                            UNITED STATES MAGISTRATE JUDGE

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28 Stip. to Extend Def.'s MSJ