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10 **UNITED STATES DISTRICT COURT**
11 **EASTERN DISTRICT OF CALIFORNIA**

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13 DEBRA ANN JACKSON,) Case No.: 2:13-cv-01097-CKD
14 Plaintiff,)
15 vs.) STIPULATION AND ~~PROPOSED~~ ORDER
16 CAROLYN W. COLVIN,) FOR AN EXTENSION OF TIME
Acting Commissioner of Social Security,)
17 Defendant.)
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20 IT IS HEREBY STIPULATED, by and between the parties, through their respective
21 counsel of record, that the time for Defendant to respond to Plaintiff's Motion for Summary
22 Judgment be extended for 30 days until March 7, 2014. This is Defendant's first request for an
23 extension of time to respond to Plaintiff's motion. Defense counsel was reassigned this case
24 from another attorney and needs additional time to further review the file and prepare a response
25 in this matter due to a heavy workload, despite due diligence.

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1 The parties further stipulate that the remaining dates in the Court's Scheduling Order
2 shall be modified accordingly.

3 Defense counsel apologizes to the Court for any inconvenience caused by this delay.

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5 Respectfully submitted,

6 LAW OFFICE OF RICHARD WHITAKER

7 Dated: February 5, 2014

/s/ Richard Allen Whitaker*

(*as authorized via email on 2/5/14)

8 RICHARD ALLEN WHITAKER
9 Attorney for Plaintiff

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11 Dated: February 5, 2014

BENJAMIN B. WAGNER
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15 By: /s/ Lynn M. Harada
16 LYNN M. HARADA
Special Assistant U.S. Attorney

17 Attorneys for Defendant

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20 ORDER:

21 APPROVED AND SO ORDERED:

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23 Dated: February 6, 2014



24 CAROLYN K. DELANEY
25 UNITED STATES MAGISTRATE JUDGE
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