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8 Attorneys for Defendant  
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10 **UNITED STATES DISTRICT COURT**  
 11 **EASTERN DISTRICT OF CALIFORNIA**

13	TONYA L. FREEMAN,	)	Case No.: 2:13-cv-01423-CMK
14	Plaintiff,	)	STIPULATION AND ORDER
15	vs.	)	FOR AN EXTENSION OF TIME
16	CAROLYN W. COLVIN,	)	
17	Acting Commissioner of Social Security,	)	
18	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 28, 2014. This is Defendant's first request for an  
 23 extension of time to respond to Plaintiff's motion. Defense counsel needs the additional time to  
 24 further review the file and prepare a response in this matter due to a heavy workload, despite due  
 25 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 Dated: February 26, 2014

/s/ Jesse S. Kaplan\*  
(\*as authorized via email on 2/26/14)  
JESSE S. KAPLAN  
Attorney for Plaintiff

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10 Dated: February 26, 2014

BENJAMIN B. WAGNER  
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DONNA L. CALVERT  
Acting Regional Chief Counsel, Region IX  
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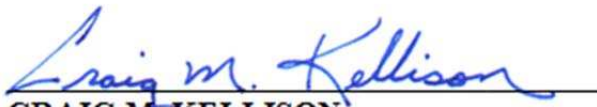
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14 By: /s/ Lynn M. Harada  
LYNN M. HARADA  
Special Assistant U.S. Attorney

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16 Attorneys for Defendant

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19 ORDER:

20 APPROVED AND SO ORDERED:

21 Dated: March 12, 2014

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23 **CRAIG M. KELLISON**  
24 UNITED STATES MAGISTRATE JUDGE  
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