

1 BENJAMIN B. WAGNER  
 2 United States Attorney  
 3 DONNA L. CALVERT, SBN IL 6191786  
 4 Regional Chief Counsel, Region IX  
 5 Social Security Administration  
 6 HENRY L. CHI, CSBN 265009  
 7 Special Assistant United States Attorney  
 8 160 Spear Street, Suite 800  
 9 San Francisco, CA 94105  
 10 Telephone: 415-977-8953  
 11 Facsimile: 415-744-0134  
 12 E-Mail: [henry.chi@ssa.gov](mailto:henry.chi@ssa.gov)

Attorneys for Defendant

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

14 MISTY NEWTON,	)	CIVIL NO. 2:13-cv-02458-GEB-EFB
	)	
15 Plaintiff,	)	<b>STIPULATION AND PROPOSED</b>
16 v.	)	<b>ORDER FOR A FIRST EXTENSION OF</b>
	)	<b>TIME FOR DEFENDANT TO RESPOND</b>
17 CAROLYN W. COLVIN,	)	<b>TO PLAINTIFF'S OPENING BRIEF</b>
	)	
18 Acting Commissioner of Social Security,	)	
	)	
19 Defendant.	)	
	)	
20	)	
	)	

21

22 IT IS HEREBY STIPULATED, by and between the parties, through their respective  
 23 counsel of record, that Defendant shall have a first extension of time of 30 days to respond to  
 24 Plaintiff's opening brief. Counsel for Defendant requests this extension in light of other district  
 25 court litigation, planned vacation, and substantive non-litigation matters.  
 26

1 The current due date is June 18, 2014. The new due date will be July 18, 2014. The  
2 parties further stipulate that the Court's Scheduling Order shall be modified accordingly.

3  
4 Respectfully submitted,

5  
6 Dated: June 11, 2014

/s/ Robert Charles Hubbs  
(by email authorization on June 11, 2014)  
Attorney for Plaintiff

7  
8  
9 Dated: June 11, 2014

BENJAMIN B. WAGNER  
United States Attorney

10  
11  
12 By: /s/ Henry L. Chi  
Henry L. Chi  
Special Assistant U.S. Attorney

13  
14 Attorneys for Defendant

15  
16  
17  
18 ORDER

19 APPROVED AND SO ORDERED.

20 DATED: June 12 2014



21 EDMUND F. BRENNAN  
22 UNITED STATES MAGISTRATE JUDGE