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 7 UNITED STATES DISTRICT COURT
 8 EASTERN DISTRICT OF CALIFORNIA
 9 SACRAMENTO DIVISION

| | | |
|------------------------|---|----------------------------------|
| VONDA K. KIRK, |) | Case No.: 13-CV-02571 EFB |
| |) | |
| Plaintiff, |) | STIPULATION AND [PROPOSED] ORDER |
| |) | FOR EXTENSION OF TIME |
| v. |) | |
| |) | |
| CAROLYN W. COLVIN, |) | |
| Commissioner of Social |) | |
| Security |) | |
| |) | |
| Defendant. |) | |
| |) | |

18 IT IS HEREBY STIPULATED by the undersigned for the respective parties,
 19 subject to the approval of the Court, that the Plaintiff, Vonda K. Kirk, have
 20 a 28-day extension of time in which to file a Motion for Summary Judgment
 21 Motion, up to and including July 25, 2014. This extension is being sought
 22 because the undersigned counsel for the Plaintiff is in the process of
 23 relocating her home and office. In keeping with the initial scheduling order
 24 in this Social Security case, Defendant's Response to the Plaintiff's Motion
 25 for Summary Judgment is due 30 days after service of the Motion for Summary
 26 Judgment. Plaintiff's Reply to the Defendant's Opposition is due 21 days
 27 after service of Defendant's Opposition.

28 Plaintiff respectfully requests that the Court approve this stipulation
 for a 28-day extension of time for Plaintiff to file a Motion for Summary

1 Judgment until July 25, 2014. This is the first extension of time that
2 Plaintiff has requested in this case.

3
4 Respectfully submitted,

5 Dated: June 11, 2014

6 "/s/ Theophous Reagans"
7 (As authorized via e-mail)
8 THEOPHOUS REAGANS
9 Special Assistant United States Attorney
10 Attorney for Defendant

11 Dated: June 11, 2014

12 By: "/s/ Barbara M. Rizzo"
13 BARBARA M. RIZZO
14 Attorney for Plaintiff

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16 IT IS ORDERED that Plaintiff, Vonda K. Kirk, shall have up to and
17 including July 25, 2014, to file a Motion for Summary Judgment.

18 Dated: June 12, 2014.

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21 EDMUND F. BRENNAN
22 UNITED STATES MAGISTRATE JUDGE
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