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8 Attorneys for Defendant

9 **UNITED STATES DISTRICT COURT**
 10 **EASTERN DISTRICT OF CALIFORNIA**
 11 **SACRAMENTO DIVISION**

13	NEIMA FAIZ JOSEPH,)	Case No.: 2:13-cv-02628-CMK
14)	
15	Plaintiff,)	STIPULATION AND PROPOSED ORDER
)	FOR AN EXTENSION OF TIME
16	vs.)	
17	CAROLYN COLVIN, Acting)	
	Commissioner of Social Security,)	
18	Defendant.)	

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21 IT IS HEREBY STIPULATED, by and between the parties, through their respective

22 counsel of record, that the time for responding to Plaintiff’s Motion for Summary Judgment be

23 extended from October 17, 2014, to December 2, 2014. This is Defendant’s first request for an

24 extension of time to respond to Plaintiff’s motion. Defendant respectfully requests this

25 additional time because the agency is considering reassigning the matter to new counsel.

26 The parties further stipulate that the Court’s Scheduling Order shall be modified

27 accordingly.

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1 Counsel apologizes to the Court for any inconvenience caused by this delay.

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3 Respectfully submitted,

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5 Dated: October 15, 2014

/s/ Jesse S. Kaplan

(As authorized via email on October 15, 2014)

6 JESSE S. KAPLAN
7 Attorney for Plaintiff

8
9 Dated: October 15, 2014

BENJAMIN B. WAGNER
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Social Security Administration


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13 By: /s/ Kevin G. Gill

14 KEVIN G. GILL
15 Special Assistant U.S. Attorney
16 Attorneys for Defendant

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18 ORDER

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20 APPROVED AND SO ORDERED:

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22 Dated: October 17, 2014


CRAIG M. KELLISON
UNITED STATES MAGISTRATE JUDGE