1 2 3 4 5 6 7 8 9	BENJAMIN B. WAGNER United States Attorney DONNA L. CALVERT Regional Chief Counsel, Region IX Social Security Administration TIMOTHY R. BOLIN, CA SBN 259511 Special Assistant United States Attorney Social Security Administration Office of the General Counsel 160 Spear St Ste 800 San Francisco, CA 94105 Telephone: (415) 977-8962 Facsimile: (415) 744-0134 Email: timothy.bolin@ssa.gov Attorneys for Defendant	
11	UNITED STATES DISTRICT COURT	
12	EASTERN DISTRICT OF CALIFORNIA	
13	SACRAMENTO DIVISION	
14		
15	RUSSELL HERNANDEZ,	Case No. 2:13-cv-02629
16	Plaintiff,	JOINT STIPULATION TO EXTEND
17	v.	DEFENDANT'S TIME TO FILE CROSS-MOTION FOR
18)	SUMMARY JUDGMENT
19	ACTING COMMISSIONER OF SOCIAL SECURITY,	
20	Defendant.	
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1	The parties hereby stipulate, through their undersigned attorneys and subject to the		
2	Court's approval, that Defendant shall have an extension of time, up to and including		
3	September 22, 2014, in which to file her cross-motion for summary judgment. Defendant		
4	requests this extension because of her attorney's inordinately heavy case load for the month of		
5	August 2014, including two appellate briefs, seven district court briefs, and an opposition and		
6	hearing in district court. The parties request this extension in good faith, with no intent to delay		
7	proceedings unduly.		
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9	Respectfully submitted,		
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11	Date: August X, 2014 /s/ Jesse S. Kaplan JESSE S. KAPLAN		
12	Attorney for Plaintiff		
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14	Date: August X, 2014 BENJAMIN B.WAGNER United States Attorney		
15	DONNA L. CALVERT		
16	Regional Chief Counsel, Region IX Social Security Administration		
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18	/s/ Timothy R. Bolin TIMOTHY R. BOLIN		
19	Special Assistant United States Attorney		
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21	ORDER		
22	Based on the foregoing joint stipulation, and for cause shown, THE COURT ORDERS that Defendant shall have until September 22, 2014, to file her cross-motion for summary		
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24	judgment, with all subsequent deadlines set forth in the Court's scheduling order also		
25	extended accordingly.	1	
26	Dated: August 22, 2014		
27	CRAIG M. KELLISON UNITED STATES MAGISTRATE JUDGE		

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