

1 BENJAMIN B. WAGNER  
United States Attorney  
2 DONNA CALVERT  
Regional Chief Counsel, Region IX  
3 Social Security Administration  
4 JACOB M. MIKOW, CSBN 238045  
Special Assistant United States Attorney  
5 160 Spear Street, Suite 800  
San Francisco, CA 94105  
6 Telephone: 415-977-8976  
7 Fax: 415-744-0134  
Jacob.Mikow@ssa.gov  
8

9 Attorneys for Defendant

10 **UNITED STATES DISTRICT COURT**  
11 **EASTERN DISTRICT OF CALIFORNIA**

12 LOIS MARTIN, ) No. 2:13-cv-02671-DAD  
13 )  
Plaintiff, ) STIPULATION AND ORDER FOR AN  
14 ) EXTENSION OF TIME  
vs. )  
15 )  
16 CAROLYN W. COLVIN, )  
Acting Commissioner of Social Security, )  
17 )  
18 Defendant. )

---

19  
20 IT IS HEREBY STIPULATED, by and between the parties, through their respective  
21 counsel of record, that the time for responding to Plaintiff’s Motion for Summary Judgment be  
22 extended from March 6, 2015 to April 6, 2015. This is Defendant’s second request for an  
23 extension of time to respond to Plaintiff’s motion. Assistant Regional Counsel In Seon Jeong  
24 was assigned to this case and has diligently attempted to complete Defendant’s responsive brief  
25 in a timely matter. However, the undersigned counsel for Defendant seeks this extension due to  
26 the press of workload including a Ninth Circuit brief and high volume of other disability matters.

27 The parties further stipulate that the Court’s Scheduling Order shall be modified  
28 accordingly.

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

3  
4 Dated: February 26, 2015

5 Respectfully submitted,  
6 /s/ Jesse S. Kaplan  
7 (As authorized via email on 2/26/2015)  
8 JESSE S. KAPLAN  
9 Attorney for Plaintiff

10 Dated: February 26, 2015

11 BENJAMIN B. WAGNER  
12 United States Attorney  
13 DONNA CALVERT  
14 Regional Chief Counsel, Region IX  
15 Social Security Administration

16 By: /s/ Jacob M. Mikow  
17 JACOB M. MIKOW  
18 Special Assistant United States Attorney  
19 Attorneys for Defendant

20 OF COUNSEL:

21 In Seon Jeong  
22 Assistant Regional Counsel

23 ORDER

24 Pursuant to the parties' stipulation, IT IS SO ORDERED.

25 Dated: February 27, 2015

26   
27 DALE A. DROZD  
28 UNITED STATES MAGISTRATE JUDGE

Ddad1\orders.soc sec\martin2671.stip.eot3.ord.docx