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8 Attorneys for Defendant
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10 **UNITED STATES DISTRICT COURT**
 11 **EASTERN DISTRICT OF CALIFORNIA**

13 MARIO LAMONT BROWN,)	Case No.: 2:14-cv-00952-EFB
)	
14 Plaintiff,)	STIPULATION AND PROPOSED ORDER
)	FOR AN EXTENSION OF TIME
15 vs.)	
16 CAROLYN W. COLVIN,)	
Acting Commissioner of Social Security,)	
)	
17 Defendant.)	
18)	

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20 IT IS HEREBY STIPULATED, by and between the parties, through their respective
 21 counsel of record, that the time for Defendant to respond to Plaintiff’s Motion for Summary
 22 Judgment be extended for 30 days until December 15, 2014. This is Defendant’s first request for
 23 an extension of time to respond to Plaintiff’s motion. Defense counsel needs the additional time
 24 to further review the file and prepare a response in this matter due to a heavy workload, despite
 25 due diligence.

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1 The parties further stipulate that the remaining dates in the Court's Scheduling Order
2 shall be modified accordingly.

3 Defense counsel apologizes to the Court for any inconvenience caused by this delay.

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5 Respectfully submitted,

6 Dated: November 12, 2014

/s/ Lynn Harada for Peter Brixie*

(*as authorized via telephone on 11/12/14)

PETER BRIXIE

Attorney for Plaintiff

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9
10 Dated: November 12, 2014

BENJAMIN B. WAGNER

United States Attorney

DONNA L. CALVERT

Regional Chief Counsel, Region IX

Social Security Administration

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14 By: /s/ Lynn M. Harada

LYNN M. HARADA

Special Assistant U.S. Attorney

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16 Attorneys for Defendant

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19 ORDER

20 APPROVED AND SO ORDERED.

21 Dated: November 14, 2014.



THE HONORABLE EDMUND F. BRENNAN

United States Magistrate Judge

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