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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 January 14, 2015. This is Defendant’s second request
 23 for an extension of time to respond to Plaintiff’s motion. Defense counsel needs the additional
 24 time to address the issues raised in Plaintiff’s brief due to a heavy workload, including several
 25 district court cases and a Ninth Circuit case, despite 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: December 12, 2014

/s/ Lynn M. Harada for Peter Brixie*

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

PETER BRIXIE

Attorney for Plaintiff

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10 Dated: December 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.

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22 Dated: December 15, 2014.


EDMUND F. BRENNAN

UNITED STATES MAGISTRATE JUDGE

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