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Attorneys for Defendant

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

|                               |   |                       |
|-------------------------------|---|-----------------------|
| SARAH MICHELLE BARNES,        | ) | No. 2:14-CV-01071-CKD |
|                               | ) |                       |
| Plaintiff,                    | ) | STIPULATION TO EXTEND |
|                               | ) | BRIEFING SCHEDULE     |
| v.                            | ) |                       |
|                               | ) |                       |
| CAROLYN W. COLVIN,            | ) |                       |
| Acting Commissioner of Social | ) |                       |
| Security,                     | ) |                       |
|                               | ) |                       |
| Defendant.                    | ) |                       |
|                               | ) |                       |

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The parties stipulate and agree, subject to the Court's approval, that the time for Defendant to file a Cross-Motion for Summary Judgment from DECEMBER 17, 2014 to JANUARY 17, 2015. This stipulation is necessary because counsel for Defendant's Counsel has a backlog of cases due in part to his absence from the office both for leave

1 and illness. Additionally, Defendant's counsel is litigating and overseeing several  
2 bankruptcy adversary proceedings. Defendant's counsel needs additional time to review  
3 this case and to prepare a response. This is Defendant's first request for an extension.  
4 The parties request this extension in good faith, with no intent to prolong  
5 proceedings unduly. Defendant apologizes for any inconvenience caused by this delay.  
6

7 Dated: DECEMBER 15, 2015

/s/ Joseph C. Fraulob  
(email authorization)  
JOSEPH C. FRAULOB  
Attorney for Plaintiff

11 Dated: DECEMBER 15, 2015

BENJAMIN B. WAGNER  
United States Attorney  
THEOPHOUS H. REAGANS

16 By: /s/ Theophous H. Reagans  
THEOPHOUS H. REAGANS  
Special Assistant United States Attorney  
Attorneys for Defendant

20 **ORDER**

22 APPROVED AND SO ORDERED.

26 Dated: December 17, 2014

  
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CAROLYN K. DELANEY  
UNITED STATES MAGISTRATE JUDGE