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Attorneys for Defendant

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION**

JOSEPH NATHANIEL MARTINEZ,

Plaintiff,

v.

CAROLYN W. COLVIN,
Acting Commissioner of Social
Security,

Defendant.

Case No.: 2:14-cv-01095-KJN

STIPULATION AND PROPOSED
ORDER TO EXTEND TIME

The parties, through their respective counsel, stipulate that the time for filing of Defendant's Cross-Motion for Summary Judgment and Memorandum in Support of Defendant's Cross-Motion be extended thirty (30) days from January 10, 2015 to February 9, 2015. This is defendant's first request for an extension of time. Counsel for the Defendant needs additional time to pursue settlement of this case and apologizes for any inconvenience caused by this delay.

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2 Dated: January 8, 2015

/s/ Andrew T. Koenig
ANDREW T. KOENIG,
Attorney for Plaintiff
(by telephonic authorization January 7, 2015)

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7 Dated: January 8, 2015

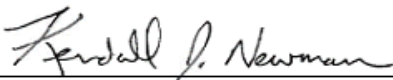
Respectfully submitted,
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Regional Chief Counsel, Region IX
Social Security Administration

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12 By: /s/ Ben A. Porter
BEN A. PORTER
Special Assistant U.S. Attorney
Attorneys for Defendant

18 **ORDER**

19 **IT IS SO ORDERED:**

20
21 Dated: January 8, 2015

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23 KENDALL J. NEWMAN
UNITED STATES MAGISTRATE JUDGE