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11 **UNITED STATES DISTRICT COURT**  
12 **EASTERN DISTRICT OF CALIFORNIA**  
13 **SACRAMENTO DIVISION**

14 JOSEPH NATHANIEL MARTINEZ,      } Case No.: 2:14-cv-01095-KJN  
15 Plaintiff,                              } STIPULATION AND PROPOSED  
16 v.                                        } ORDER TO EXTEND TIME  
17  
18 CAROLYN W. COLVIN,                    }  
19 Acting Commissioner of Social      }  
20 Security,                                }  
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22    }  
23    }  
24    }  
25    }  
26    }  
27    }  
28    }  
Defendant.

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22 The parties, through their respective counsel, stipulate that the time for filing  
23 of Defendant's Cross-Motion for Summary Judgment and Memorandum in  
24 Support of Defendant's Cross-Motion be extended thirty (30) days from January  
25 10, 2015 to February 9, 2015. This is defendant's first request for an extension of  
26 time. Counsel for the Defendant needs additional time to pursue settlement of this  
27 case and apologizes for any inconvenience caused by this delay.

1  
2 Dated: January 8, 2015

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

5  
6 Dated: January 8, 2015

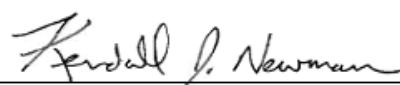
7 Respectfully submitted,  
8 BENJAMIN B. WAGNER  
9 United States Attorney  
10 DONNA L. CALVERT  
11 Regional Chief Counsel, Region IX  
12 Social Security Administration

13 By: */s/ Ben A. Porter*  
14 BEN A. PORTER  
15 Special Assistant U.S. Attorney  
16 Attorneys for Defendant

17  
18 **ORDER**

19 **IT IS SO ORDERED:**

20 Dated: January 8, 2015

21   
22 \_\_\_\_\_  
23 KENDALL J. NEWMAN  
24 UNITED STATES MAGISTRATE JUDGE