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11 Attorneys for Defendant

12 UNITED STATES DISTRICT COURT
13 EASTERN DISTRICT OF CALIFORNIA

14
15 BERNARD GAMBRELL,) No. 2:14-CV-01123-CKD
16)
Plaintiff,) STIPULATION TO EXTEND
17) BRIEFING SCHEDULE
18 v.)
19)
CAROLYN W. COLVIN,)
20 Acting Commissioner of Social)
Security,)
21)
22 Defendant.)
23)

24 The parties stipulate and agree, subject to the Court's approval, that the time for
25 Defendant to file a Cross-Motion for Summary Judgment from DECEMBER 11, 2014 to
26 JANUARY 11, 2015. This stipulation is necessary because counsel for Defendant's
27 Counsel has a backlog of cases due in part to his absence from the office both for leave
28

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 10, 2015

/s/ Jacqueline A. Forslund
(email authorization)
JACQUELINE A. FORSLUND
Attorney for Plaintiff

11 Dated: DECEMBER 10, 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**

23 APPROVED AND SO ORDERED.

25 Dated: December 12, 2014

Carolyn K. Delaney

CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE