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8 UNITED STATES DISTRICT COURT  
9 FOR THE EASTERN DISTRICT OF CALIFORNIA  
10 SACRAMENTO DIVISION

11  
12 AMBER RAE KINGSLEY,  
13 Plaintiff,  
14 v.  
15 CAROLYN W. COLVIN, Acting  
16 Commissioner of Social Security,  
17 Defendant

No. 2:14-cv-01157-DAD

STIPULATION AND ORDER FOR  
EXTENSION OF TIME

18 WHEREAS, Counsel of Record Robert C. Weems requires additional time to draft  
19 a summary judgment motion; and

20 WHEREAS, an additional extension of 30 days is appropriate to file Plaintiff's  
21 motion for summary judgment until November 9, 2015 is required due to limited support  
22 staff familiar with the case and the exceedingly large administrative record of over 1400  
23 pages, and is not requested for an improper purpose. See, FRCP 11; *Unioil, Inc. v. E.F.*  
24 *Hutton & Co.*, 809 F.2d 548, 558 (9th Cir.1986).

25 NOW, WHEREFORE, the Parties agree good cause exists for and, subject to the  
26 Court's approval, stipulate to an extension of all deadlines in this action. The revised due  
27 date for the filing of the motion for summary judgment is November 9, 2015. This is the  
28 parties' first request for additional time.

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SO STIPULATED AND AGREED:

For Plaintiff:  
WEEMS LAW OFFICES

For Defendant:  
BENJAMIN B. WAGNER  
United States Attorney  
DEBORAH LEE STACHEL  
Acting Regional Chief Counsel,  
Region IX  
Social Security Administration

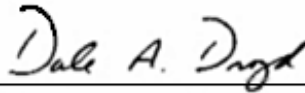
/s/Robert C. Weems  
Robert C. Weems, Attorney for  
Plaintiff

By: /s/ Richard M. Rodriguez  
Special Assistant United States  
Attorney and Attorney for the  
Defendant (per e-mail)

**ORDER**

Pursuant to the parties' stipulation, IT IS SO ORDERED.

Dated: October 15, 2015



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DALE A. DROZD  
UNITED STATES MAGISTRATE JUDGE

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