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8 Attorneys for Defendant  
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10 **UNITED STATES DISTRICT COURT**  
11 **EASTERN DISTRICT OF CALIFORNIA**

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13 RICARDO VALENZUELA, JR., ) Case No.: 2:14-cv-01446-KJN  
14 Plaintiff, ) STIPULATION AND ORDER FOR AN  
15 vs. ) EXTENSION OF TIME  
16 CAROLYN W. COLVIN, )  
Acting Commissioner of Social Security, )  
17 Defendant. )  
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20 IT IS HEREBY STIPULATED, by and between the parties, through their respective  
21 counsel of record, that the time for Defendant to respond to Plaintiff's Motion for Summary  
22 Judgment be extended for 30 days until February 20, 2015. This is Defendant's first request for  
23 an extension of time to respond to Plaintiff's motion. Defense counsel needs the additional time  
24 to further review the file and prepare a response in this matter due to pre-approved leave in  
25 December and January and a heavy workload, despite due diligence.  
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1 The parties further stipulate that the remaining dates in the Court's Scheduling Order  
2 shall be modified accordingly.

3 Defense counsel apologizes to the Court for any inconvenience caused by this delay.

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5 Respectfully submitted,

6 Dated: January 20, 2015

/s/ Lynn M. Harada for Linda S. Ziskin\*

(\*as authorized via email on 1/20/15)

LINDA S. ZISKIN

Attorney for Plaintiff

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10 Dated: January 20, 2015

BENJAMIN B. WAGNER

United States Attorney

DONNA L. CALVERT

Regional Chief Counsel, Region IX

Social Security Administration

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14 By: /s/ Lynn M. Harada

LYNN M. HARADA


Special Assistant U.S. Attorney

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16 Attorneys for Defendant

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19 ORDER:

20 APPROVED AND SO ORDERED:

21 Dated: January 22, 2015

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24 KENDALL J. NEWMAN  
25 UNITED STATES MAGISTRATE JUDGE  
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